

**MOUNT CARMEL HEALTH SYSTEM
MEDICAL EDUCATION
POLICY/PROCEDURE**

SUBJECT: VENDOR ACCESS GUIDELINES

DEPARTMENT OVERSIGHT AND MAINTENANCE: ADMINISTRATIVE

DEFINITIONS

Vendor: Includes sales representatives, service technicians, clinical and or training personnel, third party distribution or manufacturers' representatives, consultants and representatives of non Mount Carmel agencies who visit Mount Carmel facilities.

Patient Care Areas: Areas where patients are assessed, treated, and/or monitored.

Associates: Persons who provide services for Mount Carmel in return for financial and/or other compensation and includes but is not limited to resident physicians, pharmacists, and nurses.

POLICY:

The following policies have been established for vendor representatives visiting Mount Carmel facilities. These policies are intended to ensure that Mount Carmel, its patients, associates, Medical Staff and visitors are best served by vendor representatives.

1. **Infractions.** Vendor representatives must abide by all Mount Carmel vendor policies. Representatives who fail to abide by the policies are subject to the following based on the severity of the offense.
First Offense:
 - a. A letter detailing the infraction will be sent to the vendor representative, district manager and to the companies Integrity, Risk or Compliance office.
 - b. Access privileges to all Mount Carmel sites will be suspended for the offending representative for a period of time determined by the Director Supply Chain Management based on the infraction.**Second Offense:**
 - a. A letter detailing the infraction will be sent to the vendor representative, district manager and to the companies Integrity, Risk or Compliance office.
 - b. Access privileges to all Mount Carmel sites will be permanently revoked for the offending representative.
 - c. Access privileges for the company may be revoked for a period of time determined by the Director Supply Chain Management based on the infraction.

2. **Appointments.** All vendor representatives are required to have confirmed scheduled appointments in advance of visiting any facility. The appointment should occur during normal business hours and made with the appropriate individuals. Changes to the pre-scheduled time must be approved by the affected department/person and/or Supply Chain Management. Unannounced visits and/or solicitation are unacceptable and will be treated as an infraction of the vendor policy. Under no circumstances shall a vendor use the time in the facility to visit and/or solicit products or services to any area and/or person other than the scheduled contact person.
Department staff who are confronted by vendors without an appointment should ask the vendor to leave immediately and report the representative to Supply Chain Management.

3. **Registration.** All vendor representatives are required to sign-in for each visit at the following areas at the respective Mount Carmel hospital campus, except for credentialed service technicians who may go directly to the department where service is needed:
 - a. Mount Carmel East & West: 7am-8pm Main Entrance Information Desk
8pm-7am Safety & Security Office
 - b. Mount Carmel St. Ann's: Women's Pavilion, Maternity Entrance
 - c. Mount Carmel New Albany: Main Entrance Information Desk

The supplier may be asked to leave their car keys at check-in to promote sign-out when exiting the facility. When leaving the facility the vendor must sign out and return any visitor's pass they have received.

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4. Registration – Off Campus. All vendor representatives are required to sign-in upon arrival at the site and display their companies name badge at all times while in the facility. The sign in will include, date, name, company representing, who the appointment is with. Sign in logs will be maintained by each site for a period of four (4) years.
5. Identification Badges. Vendor representatives who make repeated visits to Mount Carmel facilities must complete the “Vendor Certification” requirements and be issued a permanent style badge. (See section 23) Representatives who meet the requirements below will be issued a temporary (one day) identification badge. Badges are to be worn at all times while on Mount Carmel property displayed above the waist.
 - a. The representative visits fewer than two (2) times each year.
 - b. The vendor is within the 30-day certification process
 - c. The vendor is providing coverage for the regular certification vendor or providing additional resources on an infrequent or project basis.
 - d. Contracted vendors or service providers will be issued a “Contractor” badge for the duration of the contract.
6. While in a patient care area, the following conditions must be adhered to:
 - a. Vendors cannot offer medical opinions or service or have a role in the diagnosis and/or treatment of patients.
 - b. The physician must inform the patient and the patient must give consent for any vendor to participate and/or observe in that patient’s area of care.
 - c. Hospital officials must approve admittance of a vendor into the operating room.
 - d. Vendors cannot touch and/or operate equipment used for current patient care unless covered under the terms and conditions of the contract and approved by hospital officials.
 - e. Vendors cannot participate in any manner in a surgical or interventional procedure except in the role of observer unless covered under the terms and conditions of the contract and approved by hospital officials from that patient care area and/or Supply Chain Management.
 - f. Infection control policies and procedures must be adhered to at all times. Vendors who enter direct patient care areas must have a current Vendor Level III certification.
7. Prohibited Areas. Vendors are prohibited in any areas of a Mount Carmel facility where direct patient care is being provided unless authorized by Mount Carmel personnel and have a current Level III vendor certification. Exceptions to a Level III vendor can be made for representatives visiting infrequently who provide evidence of a current negative TB test. Vendors shall have access to the surgeons’ lounge with permission only.
8. Protected Information. Vendors are not entitled to any patient information, including photographs, either identified or de-identified. Vendors requiring any patient information must request the information and have it authorized to be released to them through the execution of Mount Carmel’s Data Use Agreement.
9. Equipment. Any equipment brought into and out of Mount Carmel facilities must be clearly marked with its company’s name and contact information
10. Product Evaluations. All new product and service requests must first be presented to Supply Chain Management and processed through the new product review process called STAT (Strategic Technology and Assessment Process) before presentation to departments. No orders or product evaluations are to be given or authorized to any vendor by any hospital personnel other than those persons authorized to do so. Mount Carmel shall not be invoiced for or held liable to purchase any products supplied by a vendor that have not been issued on a purchase order nor had prior authorization for use in a Mount Carmel facility.
11. Product Pricing. Supply Chain Management is the sole authorized agents for Mount Carmel for the solicitation and evaluation of product pricing from sales representatives. Mount Carmel has a strict process

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of reviewing new and existing products. Vendors should contact Supply Chain Management to comply with that process.

12. Samples. Delivery of samples for use must be approved by Supply Chain Management by completion of the Sample Request Form. Delivery of samples without authorization is forbidden. Pharmaceutical samples must be coordinated through each facility's Pharmacy Department and in accordance with the Mount Carmel Pharmacy Policy and Procedure.
13. Posting Information/displays. Vendors cannot post any information on bulletin boards, place in staff mailboxes or leave in any Mount Carmel facility without the consent of Mount Carmel Supply Chain Management or Human Resources.
14. Vendor sponsored raffles, lotteries or contests which result in gifts to the winner are forbidden.
15. Vendor Provided Food. All food supplied by vendor representatives must be provided with the intent of providing an educational forum. Content and objectives must be identified. For each event that food is provided by a vendor representative a "Vendor provided Education/Inservice" form must be completed by the department and sent to the Education department.
16. Meetings with Physicians. All appointments made by vendors to see a private physician must be arranged directly with the physician and/or the physician's office staff and should take place at the physician's office. If the physician agrees to see the vendor at a Mount Carmel facility, the physician's office must notify the department director that the appointment has been made. The vendor must then follow the procedure outlined above. Vendors who have been denied access to Mount Carmel facilities will not be able to meet on Mount Carmel premises.
17. Phone Use. Use of Mount Carmel phones by vendors, other than public telephones, is prohibited. Cell phone usage by vendors shall be according to Mount Carmel policy.
18. Paging. Vendors may not page employed physicians, residents or hospital personnel.
19. Tours. Suppliers and other outside parties wishing a general tour of a facility or department must contact Supply Chain Management to arrange tour.
20. Parking. Vendors shall only park in approved spaces:
MCW: Garages (paid parking)
MCE: Visitor/Patient parking
MCSA: East of 477 Cooper Road or in two time-slotted areas near the loading dock
MCNA: Lots located near the rear.
21. Standards of Conduct, Confidentiality and Conflict of Interest. All vendors are expected to follow Mount Carmel's Standards of Conduct and Confidentiality Policies. All suppliers will be required to understand and agree to Mount Carmel's conflict of interest, confidentiality and standards of conduct program. Supply Chain Management has the responsibility to coordinate the vendor certification program.
22. Vendor Certification. All vendors are required to meet the Vendor Certification requirements. Each representative's request will be reviewed and ranked Level I, II, or III, according to the standards below. It is the responsibility of the vendor to pursue certification by contacting the Mount Carmel Supply Chain Management Department. All other exceptions must be approved by the Director of Supply Chain Management.
A vendor badge will be issued for some Level I vendors and all Level II and Level III vendors. These badges provide staff with the visible means of determining if the vendor has met the certification

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requirements. Failure to display the badge will result in the vendor being denied access to facilities and staff. This badge does not waive the vendor's responsibility to sign in upon arrival at each facility. The three vendor levels are defined as follows:

LEVEL I - Vendor where there is very little expectation that they will be in patient care areas with no patient or visitor contact. Examples: One time vendor visits, delivery drivers, vendor regional or national representatives.

Level I Annual Requirements:

Sign "Mount Carmel conflict of interest/confidentiality" form.

Sign "I have read and understand Mount Carmel Purchasing Policies" statement.

Sign "Mount Carmel Code of Conduct" statement.

LEVEL II - Vendor where there is an expectation that they will have appointments in patient care areas, with no patient or visitor contact. May periodically provide product in-services to staff. By working closely with hospital staff these vendors may have access to confidential information but is not a part of their business relationship.

Level II Annual Requirements:

Completion of Safety Education Packets.

Sign "Mount Carmel conflict of interest/confidentiality" form.

Sign "I have read and understand Mount Carmel Purchasing Policies" statement.

Sign "Mount Carmel Code of Conduct" statement.

Update transcript of training and certifications relating to current position.

A vendor satisfying these requirements will be issued an ID badge that is dated and expires annually and identifies the vendor as Level II.

LEVEL III - Vendor where there is an expectation that they will have appointments in patient care areas, may have contact with patients or visitors or have access to treatment areas while patients are present and may have access to confidential records.

Level III Requirements:

Once - Drug screen or attestation from employer. One time only per current employer.

Criminal background check or attestation from employer. One time only per current employer.

Annual - TB test results or attestation. The first TB test must be a 2 part TB test.

Subsequent tests can then be 1 part tests.

Completion of Safety Education Packets.

Sign "Mount Carmel conflict of interest/confidentiality" form.

Sign "I have read and understand Mount Carmel Purchasing Policies" statement.

Sign "Mount Carmel Code of Conduct" statement.

Update transcript of training and certifications relating to current position.

A vendor satisfying these requirements will be issued an ID badge that is dated and expires annually and identifies the vendor as Level III.

23. If the vendor has a Vendor Certification badge whose expiration date has passed, he/she must go to Safety & Security where they must exchange their badge for a visitor's badge. The vendor must contact Supply Chain Management as soon as possible to complete the requirements for a new badge.
24. Any vendor not adhering to the above policy will be escorted out of the facility by the security department and cancellation of any existing business with Mount Carmel may result.

DEVELOPED BY: Supply Chain Management

ORIGINAL DATE: 1/03

REVIEW/REVISION DATE: 5/05, 5/06, 11/07, 5/09

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REPLACES: Administrative P/P" Vendor Visitation Guidelines..."

REVIEWED BY: Administrative Policy Team 5/4/09

Ronald E. Whiteside 6/1/09
Vice President Date

APPROVAL FOR IMPLEMENTATION BY: Accreditation Council
Date: 6/17/09 via email vote