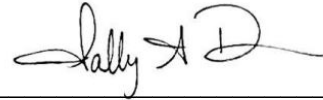

ASCENSION PROCEDURE # 706**SUBJECT: Vendor Access****EFFECTIVE DATE: 06/17/2019****REVISION DATE: 06/05/2023**

Approved: _____

*Prior Revisions: 06/19/2019; 08/01/2019;
10/02/2019; 10/21/2020; 08/18/2021; 11/01/2021*Printed: Sally DeitchTitle: Executive Vice President, Nursing &
Operations Infrastructure

Subject:

This Administrative Procedure sets forth guidelines for relationships with Vendor Representatives. Ascension desires to provide a safe and effective environment for patients, Associates, physicians and other allied health professionals, while complying with regulatory guidelines.

In addition to the guidelines outlined in this Administrative Procedure, access to property of an Ascension Participant is conditioned on a Vendor Representative's strict continued compliance to Ascension rules, standards, policies, and procedures. This Administrative Procedure and any rules or Procedures referenced herein, are subject to change in Ascension's sole and absolute discretion with or without advance notice it is the Vendor Representative's responsibility to keep informed and compliant with them.

Post-Acute Representatives and Third Party Couriers Delivering To and Picking Up From Sterile Processing Departments are also addressed in this procedure.

This Administrative Procedure is intended:

- To establish a structured system among Ascension Participants for education, training, and introduction of products, procedures, techniques, technology, and equipment to our Associates and physicians.
- To define conditions and requirements Vendor and Post-Acute Representatives must abide by to provide training, knowledge transfer, expertise, products and/or services within facilities owned by Ascension Participants. The requirements and guidelines in this policy will be applied to onsite/in-person visits as well as virtual visits and electronic/verbal communications where applicable.

Definitions

1. “**Ascension**” means Ascension Health Alliance and all organizations directly or indirectly controlled by Ascension.

2. “**Ascension Participant**” means an Ascension-owned or Ascension-controlled site of care, currently excluding Ascension Living sites, which, through a Participation Agreement with The Resource Group, has access to The Resource Group’s contract portfolio.
3. “**Associate**” means an employee of an Ascension Participant who provides services in exchange for compensation and receives a W-2 from Ascension.
4. “**Counter Detailing**” means delivering any information or disparaging remarks intended to persuade Associates of a certain viewpoint that is contrary to national Ascension direction or strategy.
5. “**Post-Acute Representative**” means a representative of a post-acute provider, agency or durable medical equipment company who acts as a liaison between facilities and patients and/or assists directly with patient discharge and/or patient transition to a post-acute facility. Examples include but are not limited to representatives of assisted living facilities, skilled nursing facilities, long term acute care facilities, rehabilitation facilities, hospice companies, home health care agencies or payers assisting their beneficiaries/participants with discharge planning and transition to post-acute facilities, and durable medical equipment companies
6. “**The Resource Group Lead**” means The Resource Group Associate responsible for managing Vendors within the Ascension facility.
7. “**Sample**” means products, including pharmaceuticals, provided at no cost to the facility or patient and not procured and/or paid for through the standard procurement and ordering process. Product Samples requested by Ascension through the standard product evaluation process are not considered “Samples” for the purposes of this policy.
8. “**Sterile Processing Department**” means the area within the hospital responsible for instrument processing, decontamination, sterilization, inspection, preparation, packing and storage of instruments and medical devices needed for surgery.
9. “**Third Party Couriers Delivering To and Picking Up From Sterile Processing Departments**” means a third party courier acting on behalf of a Vendor delivering and/or picking up instruments and/or implants to facility Sterile Processing Departments to be used in medical procedures.
10. “**Vendor**” means any entity that sells or attempts to sell products or services to Ascension.
11. “**Vendor Credentialing System**” means The Resource Group contracted system to manage Vendor Representative registration, appointments and credentialing.
12. “**Vendor Representative**” means a sales or service professional that represents a company or companies to The Resource Group and/or Ascension Participants including physicians, nurses, buyers, purchasing agents, executives and other Associates that may be general users or influencers of the company’s product. Vendor Representatives represent

manufacturers, distributors, service companies, and other organizations. Vendor Representatives generate sales, manage contracts, provide quotes, demonstrate products, make repairs, and perform many other duties generally associated with representing their company. Contractors, delivery service representatives, general or skilled laborers performing facility maintenance and construction, installers installing equipment in non-patient care areas, facility-employed project consultants, clinical trial researchers, Post-Acute Representatives as defined above, and any third-party representative providing care or services directly to patients on behalf of the Ascension Participant are not considered Vendor Representatives for the purposes of this policy. See **Appendix A** for a list of out of scope representatives.

13. “**Voucher/Coupon**” means documents, physical or electronic, provided at no cost to the facility or patient, that can be submitted to a manufacturer in exchange for free or discounted products, including pharmaceuticals.

Procedure

1. **Criteria to Enter.** Vendor Representative must meet the following criteria:

See Vendor Access Support Procedure for additional information regarding Criteria to Enter [HERE](#).

1.1 Training Requirements/Credentialing

- 1.1.1 No Vendor Representatives shall be given access to property of an Ascension Participant without the successful completion of the Ascension’s vendor credentialing program at the appropriate credentialing level.

1.2 Sign-In/Sign-Out

- 1.2.1 Vendor Representatives must check in via the Vendor Credentialing System prior to their approved appointment or medical procedure support and check out at the conclusion of each visit.

1.3 Dress Code and Badge Requirements

- 1.3.1 Vendor Representatives visiting an acute site are required to display at all times a clearly visible time stamped badge.
- 1.3.2 Vendor Representatives requiring access to surgical or sterile processing areas must comply with facility Surgical Department, Sterile Processing Department and Infection Prevention policies regarding scrubs and surgical attire.

1.4 Parking

- 1.4.1 Vendor Representatives must review and abide by Ascension Participant's parking policies for any visit.
- 1.4.2 Vendor Representatives are not permitted to park in designated patient, Associate, or physician parking areas or against loading docks.

2. Approved Circumstances for Entry

See Vendor Access Support Procedure for additional information regarding Approved Circumstances for Entry [HERE](#).

- 2.1 Medical Procedure/Direct Patient Assistance (includes instrument and implant drop-off/pickup as referenced in Section 4)
 - 2.1.1 Vendor Representatives are not permitted to access any operating room or procedural suite unless invited by a physician to assist with the use of an approved product in an approved procedure.
 - 2.1.2 Exceptions may be made for emergent circumstances that will affect patient care as determined by a physician.
 - 2.1.3 Vendor Representatives may enter at a physician's request to provide direct patient assistance with products or equipment that require advanced expertise.
- 2.2 In-Servicing/Education
 - 2.2.1 Vendor Representatives are permitted to perform onsite in-servicing and product education/training if approved by The Resource Group in coordination with Clinical Professional Development.
- 2.3 Product, Equipment and Facility Maintenance
 - 2.3.1 Vendor Representatives are permitted to perform product, equipment and facility maintenance if approved by The Resource Group or The Resource Group's designee (e.g., information technology, clinical engineering or facilities personnel).
 - 2.3.2 Emergent and unexpected repairs may be approved on a shorter timeline in emergent situations. In these situations, Vendor Representative sign-in is still required.
- 2.4 Inventory Counting
 - 2.4.1 Vendor Representatives are permitted to enter facilities to count consignment inventory with an approved appointment from The Resource Group.

2.5 Samples Drop-Off

2.5.1 In accordance with Section 4.3, Vendor Representatives may drop off approved Samples, Vouchers, and Coupons.

3. Vendor Access to Areas, Patients, and Patient Information.

3.1 Access to Facility

3.1.1 Vendor Representatives are not permitted on patient care areas, nursing units, in the emergency room, in outpatient clinics or other patient treatment areas where patient care is provided unless specifically requested by the hospital medical, clinical, or administrative staff to support an approved patient procedure or assist a patient.

3.1.2 Vendor Representatives are not permitted in physician lounges unless expressly invited by a physician and properly displaying a valid badge. At any point while present in a physician lounge, a physician, administrator, or other Ascension Associate may request that Vendor Representative leave the physician lounge.

3.2 Access to Patients and Patient Information

3.2.1 Vendor Representatives will not be permitted to observe or have direct contact with patients unless clinically necessary.

- It is Ascension's policy that the formulation of treatment plans for patients requires a confidential, candid exchange and assessment of confidential patient and treatment information among health care professionals, without the potential appearance of outside influence, especially from Vendors.
- Examples of contacts prohibited by this policy include making rounds on the inpatient units (including the intensive care units), being present when examinations are conducted in the outpatient setting and observing surgical and non-surgical procedures.

3.2.2 All Vendor Representatives present while patients are receiving care, whether during a procedure or other circumstance, should adhere to the following protocol:

- Introduction to the patient upon entering, including company and product/service represented;
- Explanation of role in patient's care; and

- Professional, courteous, and respectful behavior that promotes patient-centered delivery of care.

3.2.3 Vendor Representatives are only permitted to access the minimum amount of protected health information required to provide care, as permitted by HIPAA guidelines.

4. Incoming Products and Equipment.

See Vendor Access Support Procedure for additional detail regarding Incoming Products and Equipment [HERE](#).

4.1 Vendor Representatives may not store any products or equipment in an Ascension Participant facility without receiving prior written permission from The Resource Group.

4.2 Vendor Representatives must follow The Resource Group's and Ascension's requirements regarding:

- Demonstration and loaner equipment
- Loaner instrument sets
- Off-contract products
- Trunk stock

4.3 Samples, Vouchers, and Coupons: Ascension does not support Vendor Representative distribution of Samples, Vouchers, and Coupons, but allows exceptions under limited circumstances.

4.4 All Non-FDA approved Investigational Devices (Class A or B) must have IRB approval and an FDA IDE/HDE number and a Material (SAP) number.

4.5 Drugs for Clinical Investigation: All drug products used for clinical investigation, whether commercially available or investigational must be procured and distributed through the Department of Pharmacy's Investigational Drug Service (IDS). Drugs used in this manner may require an IRB-approved protocol.

5. Inventory Management.

See Vendor Access Support Procedure for additional detail regarding Inventory Management [HERE](#).

5.1 Vendor Representatives must follow The Resource Group's and Ascension's requirements regarding inventory management.

6. Additional Vendor Behavior Parameters.

6.1 Marketing, Advertising, and Sales Activities.

6.1.1 Selling and promotional activities are prohibited.

- Prohibited activities include, but are not limited to delivering sales presentations, unapproved product trials, and promotion of off-contract products.
- Vendor Representatives are not permitted to promote medications or supplies, in a manner that is contrary to Ascension rules, standards, policies and procedures, or formulary, as approved by the relevant hospital or system level committees.

6.1.2 Vendor Representatives are not permitted to take still or video pictures within the facility unless there is a clinical reason and without prior authorization from the Ascension Legal Department.

6.1.3 Vendor Representatives are prohibited from distributing items displaying company advertisements and logos, without prior permission from appropriate clinical staff and approval from The Resource Group Lead.

- Logos displayed on clothing or personal items such as bags and briefcases are permitted.

6.1.4 The Resource Group initiates business with Vendors by seeking bids or proposals from potential sources and awards contracts based on a variety of criteria. In such situations, Vendor Representatives are expected to discuss potential business opportunities, contract proposals and terms of the actual or proposed relationships only with The Resource Group associates.

- Vendor Representatives are prohibited from soliciting Associates physicians, or other non-employed parties working on behalf of Ascension as contractors for pricing information or documents from meetings or other discussions.

6.2 Gifts and Food. Vendors are not permitted to provide food, gifts, or any items of monetary value to Associates, physicians, or other non-employed parties working on behalf of Ascension as contractors while visiting any Ascension Participant location.

- Donations to foundations are not governed by this policy.
- Product donations directly from Vendors for use on mission trips or other charitable purposes are not permitted. These should be coordinated through approved Medical Surplus Recovery Organizations (MSROs).

6.3 General Behavior. Vendors are required to exhibit professional, courteous, respectful, and appropriate behavior during all interactions with associates, physicians, and patients.

6.3.1 Counter Detailing activities are considered inappropriate and are prohibited.

- Vendor Representatives, both local or nationally based, are not permitted to engage with Ascension Associates at any level or independent physicians on Ascension premises regarding national or local contracting activities unless specifically requested by The Resource Group.

7. Applicable to Post-Acute Representatives and Third Party Couriers Delivering To and Picking Up From Sterile Processing Departments Only

See Vendor Access Support Procedure for additional information regarding Post-Acute Representatives [HERE](#).

7.1 Post-Acute Representatives: Post-Acute Representatives are considered separately from Vendor Representatives but are required to comply with the provisions in Policy Sections 1.4, 2.2, 3, and 6 within this Policy, as well as those specified in procedure documents.

7.1.1 Post-Acute Representatives failure to comply with these provisions may result in application of the consequences described in Section 8.

7.1.2 Post-Acute Representatives from entities that are owned or otherwise legally affiliated with Ascension (“Ascension Post-Acute Representatives”) are expected to comply with the spirit of this Policy, however, enforcement and non-compliance will be addressed outside of the Policy. In addition, Ascension Post-Acute Representatives are permitted to provide gifts or food of nominal value to Ascension Associates and facilities.

7.2 Third Party Couriers Delivering to and Picking Up From Sterile Processing Departments: Third Party Couriers Delivering to and Picking Up From Sterile Processing Departments must notify an Associate of their presence upon entering restricted areas, and are responsible for following local facility visitor policies and requirements.

8. Enforcement and Non-Compliance.

8.1 Enforcement

8.1.1 All Ascension Associates are permitted to approach and request Vendor Representatives take corrective action to remain compliant to the Vendor Access Policy, or report non-compliance to The Resource Group Lead, at any time while the Vendor Representative is in an Ascension Facility. Reasons for non-compliance include, but are not limited to:

- Vendor Representative badge is not visible or present
- Vendor Representative badge is expired
- Vendor Representative is violating dress code requirements
- Vendor Representative is present in area not permitted by credentialing level

- Vendor Representative is engaged in an activity not permitted by credentialing level
- Vendor Representative is engaged in prohibited activities as stated in this policy

8.2 Non-Compliance. Vendor Representative non-compliance with this policy will result in the following consequences:

8.2.1 First violation by Vendor:

- If a Vendor Representative violates this policy, he/she will be permanently banned from all Ascension facilities.

8.2.2 Subsequent violations by Vendor:

- For Vendors providing products or services in multiple categories, a second violation in a different product or service category will be treated as a first violation. The Resource Group will determine how products/services are categorized.
- If a second Vendor Representative from the same Vendor and same product or service category violates this policy at any location, Ascension and The Resource Group reserve the right to take any of the following actions:
 - Apply a bid transformation at the Vendor’s next competitive bid (RFP, e-Auction, etc.)
 - Permanently ban all Vendor’s Vendor Representatives from Ascension facilities
 - Terminate vendor agreement upon contract review and evaluation
 - Shift purchase volume with the vendor to alternative vendors upon contract review and evaluation
 - Eliminate or limit future contracting opportunities.

8.2.3 For violations involving national contracting activities, consequences from section 8.2.2 may be immediately applied upon first time violation.



Approved by Ascension Legal Services: 05/05/2023
Date

Appendix A
Out of Scope Representatives (Not exhaustive)

General and Skilled Laborers

- General construction workers
- Painters
- Landscapers
- Window washers

Installation

- Capital/Lab/IT or other equipment installers **who will not enter patient care areas**

Facility Maintenance

- Elevator maintenance
- HVAC maintenance
- Electrical maintenance

Contractors

- Facilities/construction project managers
- Facilities/construction project engineers
- Facilities/construction project architects

Individuals providing services to patients on behalf of Ascension Participant

- Food/Environmental services staff
- Contracted medical staff
 - Radiology Technicians
 - Hospitalists
- Interpreters/Translators

Consultants

- Executive coaches
- Process improvement consultants
- Accounting consultants

Delivery Representatives

- Delivery service representatives
- Equipment delivery service representatives (engaged only in pick up/drop off)

Clinical Trial Representatives

- Site evaluators
- Researchers
- Auditors
- Monitors