

**SIGNATURE HEALTHCARE  
BROCKTON HOSPITAL**

Subject: <b>Vendor Control Policy</b>		Page 1 of 4 (Attachment)
Original Effective Date: 6/86	Revised Date: 2/94, 3/06, 5/07, 6/12, 6/15, 3/18, 8/20, 1/22	Classification Code: 100.703
References: Identification Policy, 100.050	Reviewed Date: Policy Section: I - Administration Issuing Department/Committee: Materials Management	

**PURPOSE:**

To outline Signature Healthcare Brockton Hospital's protocol of vendor sales representatives conducting business through the Purchasing, Facilities and/or Pharmacy Departments of the Hospital.

**POLICY:**

It is the policy of Signature Healthcare Brockton Hospital that all vendor sales representatives and vendor repair technicians shall conduct their business through the Materials Management Department. Vendors shall not present proposals nor attempt to establish pricing with any department, hospital employee or physician without the knowledge, consent and/or participation of the Materials Management Department. Vendors who violate this policy may forfeit their privilege of doing business with the Hospital.

**RESPONSIBILITY:**

It is the responsibility of the Director of Materials Management to enforce this policy. It is the responsibility of all department heads and employees to ensure vendor sales representatives abide by this policy and to report any violations to the Director of Materials Management.

**PROCEDURE:**

All vendor representatives wishing to conduct business at Signature Healthcare Brockton Hospital must do so through the Materials Management Department. Vendors who have been authorized as Signature Healthcare Brockton Hospital business partners may conduct business, by appointment, with the respective departments, and in accordance with the procedures set forth below. Representatives who attempt to conduct business directly with departments, staff, or physicians, without prior authorization of Materials Management, or without an appointment, will be immediately redirected to the Materials Management Department by the affected department, and be considered in breach of this policy.

Vendor representatives are individuals who market products and services to Signature Healthcare Brockton Hospital. Vendor repair technicians are individuals who perform maintenance or install equipment. All vendor representatives and technicians entering the Hospital proper, must be fully registered and signed in to the Green Security vendor management system upon each visit to the hospital. Representatives and technicians are not allowed to conduct business at Signature Healthcare Brockton Hospital without full registration in Green Security. When fully registered and upon signing

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into the system upon each visit, the vendor representative will then be allowed/required to print a vendor badge with photo ID that must be worn visibly on a part of the clothing located above the waist. All vendor representatives and technicians entering the Signature Medical Group Ambulatory sites have the option is to download the Green Security mobile App which can display the same information. The Green Security sign-in kiosk is located in the main lobby. Those representatives who are witnessed not wearing a badge, or being able to display their ID on their mobile App will be questioned by hospital personnel, advised of the policy, and immediately referred to the Materials Management Department.

Service personnel arriving through the Maintenance Office to perform maintenance or service will be issued a self expiring identification badge once their identity has been confirmed.

Vendor representatives are required to adhere to Signature Healthcare Brockton Hospital policies, including, but not limited to, HIPPA, and The Gifts and Gratuity Policy. Pharmaceutical representatives are required to adhere to the Signature Healthcare Brockton Hospital Guidelines for Pharmaceutical Company Representatives (see below).

Vendor representatives will not be allowed to conduct business on Signature Healthcare Brockton Hospital property after 5 pm, unless prior arrangements have been made for such activities such as product fairs/demonstrations, in-service programs, or service/repair work.

Vendor representatives wishing to introduce new product(s) need prior approval/determination of pricing and Signature Healthcare Brockton Hospital contractual adherence from Materials Management personnel. The Materials Management Department, in collaboration with the requesting department, will direct the new product introduction through the appropriate Signature Healthcare Brockton Hospital Value Analysis Committee for evaluation/approval. Trials for new products will require prior authorization through the completion and approval of the "New Product Request" form. The request and the form must be generated by a Signature Healthcare Brockton Hospital employee or physician, and may not be completed by a vendor representative. At a minimum, the request form will be signed by the user department as well as a member of the Materials Management Department.

In the event that a Signature Healthcare Brockton Hospital staff member observes a vendor representative in violation of this policy, the staff member should immediately notify the Materials Management Department. Any violation will be investigated and, based on the severity of the violation, disciplinary action, which may include verbal or written warning, restriction of activity and service calls, may be imposed. Violations committed by any one representative of a given company may result in disciplinary action against any or all representatives of that company. Repeated violations by any vendor or representative may result in the banning of future visitations by vendor or particular representative for a one--year period, or indefinitely, if warranted.

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**Guidelines for Pharmaceutical Company Representatives**

**Definition: Pharmaceutical Company Representative**

A Pharmaceutical Company Representative (PCR) shall be defined as a representative of a pharmaceutical company who enters Signature Healthcare Brockton Hospital to promote the use of products/services which are evaluated and/or purchased by the Pharmacy Department.

**General Code of Conduct for Pharmaceutical Company Representatives**

Any PCR who wishes to access Signature Healthcare Brockton Hospital facilities and be eligible for business with Signature Healthcare Brockton Hospital must register in Green Security, our vendor credentialing and compliance monitoring system.

Upon Green Security registration, PCR must read and acknowledge acceptance of the Signature Healthcare Brockton Hospital PCR guidelines, as well as any site specific procedures, annually.

All PCRs visiting Signature Healthcare Brockton Hospital must sign in and out at a Green Security kiosk location or from their mobile App.

PCRs shall display Green Security generated identification badges at all times.

The PCR must make an appointment with the secretary or designee of the hospital employee with whom they wish to speak PRIOR to conducting business with that individual.

PCRs may not be present in patient care areas at any time. Approved appointments must be held in locations that do not require travel through a patient care area.

PCRs may not use inter-hospital phones, paging system, or inter-hospital mail systems.

P&T and its sub-committee members shall not be specifically targeted by PCRs regarding product information or Committee business items.

**Disbursement of Drug Information**

PCRs shall first inform the Pharmacy Director of new drugs they wish to discuss at Signature Healthcare.

Information changes pertaining to medications on formulary (i.e. indications, dosage, routes of administration, formulations, etc.) shall be provided to the Pharmacy Department prior to discussion with other Signature Healthcare personnel.

All pharmaceutical detailing shall be within the context of P&T approved criteria for restricted drugs.

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PCRs shall limit discussions of restricted drugs with those authorized to prescribe as noted in the P&T approved criteria and designated pharmacy staff.

At no time shall PCRs detail non-formulary drugs or indications not included in Signature Healthcare criteria without approval from the Director of Pharmacy or designee.

Non-formulary categories include the following: drugs not yet reviewed by the P&T Committee, drugs reviewed and denied addition, and off-criteria indications of restricted formulary drugs.

All information and materials distributed by PCRs at Signature Healthcare must be approved by the Director of Pharmacy or designee prior to distribution.

Product package inserts and peer-reviewed journal articles that are not company labeled may be distributed only when attached to Signature Healthcare Criteria for Use to highlight differences between FDA approved indications and Signature Healthcare approved indications.

PCRs are not permitted to attend or provide educational in-services at Signature Healthcare unless prior approval is obtained from the Director of Pharmacy or designee.

Vendor Representatives wishing to introduce new drugs need prior approval/determination of pricing, and Signature Healthcare contractual/formulary adherence from the Director of Pharmacy. All information and materials related to drugs must be approved by the Director of Pharmacy prior to distribution to any department or individual at Signature Healthcare.

**REFERENCES:**

**REVIEWED BY:**

**DATE:**

Director Materials Management	12/21
Director Pharmacy	1/22
Director Operating Room	1/22
Director Facilities	1/22
Director Security	1/22
Safety Officer	1/22
Administrative Policy Committee	1/22

**MANUFACTURER REPRESENTATIVES (VENDOR) IN THE O.R.**

Prior to being granted **initial** permission to enter the Operating Room environment, all vendors will be oriented to the following O.R. specific policies, as it relates to their vendor role, in addition to completing any, and all, requirements of the Purchasing Department.

- Visitors in the Operating Room
- Infection Control Guidelines
- Fire Safety for the Operating Room Suite

At the completion of the orientation to the Operating Room, vendors will sign below that the above policies have been reviewed and that they understand their role as it relates to each of these policies.

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The above O.R. policies were reviewed with \_\_\_\_\_ of  
**Print Vendor Name**

\_\_\_\_\_ by \_\_\_\_\_.  
**Representative Company** **Print name of associate**

I understand my role as it relates to each of these policies and agree to comply with said policies.

\_\_\_\_\_  
**Signature of Vendor**

\_\_\_\_\_  
**Date**

