UNIVERSITY of MARYLAND MEDICAL SYSTEM Supply Chain Shared Services	PAGE: 1 OF 19	POLICY NO: UMMSC02
	EFFECTIVE DATE:	REVISION DATE(S):
SUBJECT: Vendor Management Policy		

KEY WORDS:

I. OBJECTIVE/BACKGROUND:

To establish a uniform policy by regulating and governing the activities of vendor sales representatives conducting business within the University of Maryland Medical System facilities.

II. APPLICABILITY:

This policy applies to all vendors and their representatives who market, sell, or provide technical assistance for medical equipment, products, medical devices and purchased services used throughout the facility. Additionally, vendor representatives conducting education/training, maintenance/repair and delivery personnel are included. This policy and procedure governs activities conducted by all facilities currently under the direct control of UMMS Supply Chain Management and Strategic Sourcing.

III. DEFINITIONS:

A. Vendor - any company or its sales representative from which UMMS purchases goods and services.

B. Vendor Sales Representative - commonly referred to as "rep" or "vendor rep." An individual working for a vendor (also called a supplier) whose purpose is to influence the organization to purchase its products and services as well as those individuals providing education after product purchase.

1. An individual seeking to sell a product or service is not considered to be a vendor for the purpose of the policy until that point at which a business relationship has been established.
2. Other vendor representatives, such as "agency staff," equipment repair technicians, facility contractors, and other services individuals may not be required to register with our vendor credentialing partner, however, specific criteria must be met with Security (badging), Employee Health (immunizations), Human Resources (background clearance), etc.

IV. POLICY:

It is the policy of UMMS to ensure patient's rights and confidentiality are maintained through a robust monitoring campaign for all vendor representatives visiting UMMS facilities.

UMMS will strive to provide a secure environment that protects the efficiency and integrity of physicians, other health care providers, employees, patient safety, privacy, family-centered care, and the integrity of the UMMS Supply Chain and Strategic Sourcing procurement process.

The activities of vendor representatives, which includes contract staff, must be coordinated and controlled to meet the UMMS requirement for security and transparent business practices.

The intent of this document is to provide vendor guidance from a system-level perspective. Local facilities reserve the right to amend this document accordingly, when extenuating circumstance exist. However, local policy language shall embrace the context of this system level policy.

Due to the distinctive operations of some hospital services, this vendor management policy contains appendices which addresses the unique characteristics, of these areas (e.g. Perioperative Services, Pharmacy, etc.)

V. PROCEDURE:

UMMS Supply Chain maintains a partnership with a nationally-renowned vendor credentialing agency – Intellicentrics, (formerly known as Reptrax). This agency manages all administrative credentialing tasks of onboarding new vendor reps who desire to conduct business within UMMS facilities. It also manages their vendor score card for compliance. A copy of the credentials are located at https://www.sec3ure.com/. Vendors are assigned either one of two memberships - premium or basic.

A. Primary Vendor Types:

1. Clinical – traditionally, the premium categorization requires an annual fee, which is paid by vendor rep to vendor credentialing agency. This vendor classification moves throughout the facility within predetermined locations.
2. Non-Clinical, the basic category does not require a fee and it is typically assigned when vendors or other business related visitors are either not conducting sales activities, nor visiting patient-care areas, but do require access to non-clinical areas within the facility on a short-term basis.
3. Pharmaceutical – vendor representing a pharmaceutical or biotech firm.
4. Contractors – this category may be managed through local facility Human Resources which manage agency staff, e.g. Nurse or Administrative Staff for specific durations of time.
5. Other – most vendor categories which do not meet the prerequisites stated above, can be found below or addressed on a case-by-case basis.

Recommendation: *Use UMMS vendor credentialing business partner primarily for short-term vendor sales rep visits, and assign Human Resources and/or Security as onboarding liaison when conducting long term agency-type engagements.*

B. Non – Vendors

1. The University of Maryland Medical System may conduct business that will be exempt from participating in the UMMS vendor program. These include but are not limited to:
    a. Academic institutions
    b. City, county, state, and federal agencies
    c. Corporate entities who provide legal or financial services to UMMS
    d. Other health care facilities or systems
    e. Professional affiliations
    f. Representatives of The Joint Commission or other regulatory agencies
    g. Other entities as determined by administration

C. Vendor Registration

1. All vendor and vendor representatives are required to register according to UMMS Vendor Management Guidelines managed by the vendor credential business partner management unless classified as exempt by the local Materials Manager, or designee.
    a. The registration website is https://intellicentrics.com/
    b. All registration fees are paid directly to vendor credentialing
    c. Vendor representatives who choose not to participate in the Vendor Management Program at UMMS are not authorized to conduct business within any UMMS facility.
    d. Each vendor representative will be required to provide documentation during the registration process specific to their vendor category.
    e. Registration: Registration must be renewed every twelve (12) months through vendor credentialing.
    f. Vendor representatives who fail to renew their registration are not authorized to conduct business with any UMMS facility until all renewal tasks are met.

D. Vendor Visits

1. Vendor representatives should not conduct onsite visits within University of Maryland Medical System without a scheduled appointment. All vendor representatives may make specific appointments directly with the visiting department. A "standing appointment" may be approved for those vendors considered to be primary or major suppliers, by the Materiel Management Manager.
2. **EXCEPTION:** The University of Maryland Medical System is a member of the Vizient Group Purchasing Organization. To ensure that we consistently comply with Vizient contracts, it will be necessary for all non-Vizient vendor representatives, to report to the appropriate UMMS Supply Chain contracts manager before scheduling appointment with hospital staff.

3. Vendor representatives will not visit any other department or individual while onsite for their appointment.
4. Vendor representatives will not visit or approach medical staff members in clinical areas except for pre-arranged educational purposes. Regularly scheduled appointments with medical staff members are to be held in the medical staff member's private office.
5. Vendor representatives will sign in on the day of their appointment at the facility vendor management check-in or kiosk location.
6. Vendor representatives will wear the temporary vendor badge produced by the vendor management program kiosk setup. The badge shall be visible and worn at all times while on UMMS facilities. Additionally, vendor representatives are encouraged to wear distinctive company identification, if available. Badges are only valid for the day of the visit.
7. Upon completion of business, vendor representatives will sign out manually at start location, or through use of the cell phone app supported by vendor management partner.
8. Vendors may not leave capital equipment on the premise for evaluation without first obtaining a purchase order from the Materials Management department. Any equipment left without a purchase order will not be the responsibility of the University of Maryland Medical System and will be considered a donation to our facility.

The purchase order must show the following:

a. Vendor name
b. Date (also the returning date after evaluation)
c. Vendor catalog number
d. Quantity
e. Unit price
f. Description
g "Hold Harmless" clauses for hospital protection

i. Note item is for evaluation only. A tag must be affixed to each piece of equipment stating the sales representative's name and his company's name; also, a date for returning the equipment.
ii. A notice shall be given to Materiel Management containing the same information as the tag; it shall also show evidence that the evaluation has been approved.
iii. Any evaluation item requiring or generating electrical current must be inspected by BioMed for patient related items, and Facilities for non-patient related items, prior to its use in the hospital.

iv. Under no circumstances will any equipment be brought to a hospital without prior authorization from the Supply Chain/Materials Management Department.

9. Violations of the provisions identified above, may result in immediate removal from the hospital by Security personnel, loss of visitation and/or display privileges, and adverse consideration for future negotiations between UMMS and the violator's company.
10. UMMS recourse for violations:
    a. Actions taken by UMMS as a result of infractions by a vendor representative of this Policy or related guidelines will be defined by the department and include but are not limited to:
    b. First violation: potential one (1) month revoked access to UMMS
    c. Second violation: potential six (6) months revoked access to UMMS
    d. Third violation: potential lifetime revocation of access UMMS
    e. In most scenarios, violations will impact vendor rep score
11. All violations will be applicable across the System for the individual representative, and all violation occurrences will be reported to UMMS Supply Chain.
12. In addition to the general provisions of this policy, vendor representatives desiring to visit Perioperative Services, or the Pharmacy, shall also adhere to the department specific guidelines listed in the attached Appendix:
    a. Perioperative Services Vendor Management, (Appendix 1)
    b. Pharmacy Vendor management Policy (Appendix 2)
13. Vendor representatives shall utilize the visitor parking area, unless it is necessary to carry heavy objects into the hospital. In this event, the representative must coordinate with Materials Management for temporary use of loading dock.

Appendix 1 – PERIOPERATIVE SERVICES VENDOR MANAGEMENT POLICY

I. OBJECTIVE:

To establish a uniform policy, regulate and govern the activities of UMMS vendor reps for the procurement of equipment, materials, products and services. To mitigate disruption to patient care services by promoting fair and equitable purchasing practices, safeguard against conflict of interest, and maintain compliance with federal, state and local laws. This policy and procedure governs activities conducted by all UMMS facilities currently under the direct guidance of UMMS Supply Chain and Strategic Sourcing.
Products and devices selected for evaluation must be approved for patient-use by appropriate regulatory agencies, promote quality outcomes, patient safety, and staff satisfaction. Parties affected by the acquisition of a product or medical device may be candidates in the evaluation and acquisition process in conjunction with UMMS Supply Chain.

II. APPLICABILITY:

This policy applies to all vendors, or their representatives marketing, selling or providing technical assistance related to products or medical devices. Employees and agents [medical staff, volunteers, Service Management vendors] of any of the legal entities listed in Corporate Compliance Policy 1202 Development of Corporate Policies, Attachment A.

III. POLICY:

It is the expectation of Supply Chain and affiliate hospitals that all vendors comply with the policy herein. Vendors wishing to conduct business with affiliate hospitals will inform the Corporate Contracting and Strategic Sourcing Department on all aspects of the current business conducted with that business partner, including but not limited to: 1) introduction of new products/services earmarked to improve cost, quality and outcomes and 2) the introduction of evolutionary and revolutionary products, services and technology.

IV. PROCEDURE:

A. APPOINTMENTS:

1. Perioperative Services/Procurement Services/Corporate Contracts/Strategic Sourcing and Materials Management are the primary contact points for all vendor representatives requesting entrance into Perioperative/Procedural/Clinical/Treatment areas.
2. Sales calls are by advance appointment only. Any sales call that do not include Perioperative, Procedural/Clinical area representation at the time of the sales call becomes the responsibility of the vendor representative to send a synopsis of the meeting to the appropriate Business Operations Director/Nurse Manager/Director or their designee within 24 hours of the meeting to include:

a. Date/time
b. Person(s) meeting with
c. Product/Service discussed
d. All product/service information supplied
e. All pricing proposals/quotes

3. Vendor representatives should be familiar with and adhere to the provisions of the following UMMS Supply Chain Corporate Policies:

a. UMMSSC01
b. UMMSSC02
c. UMMSSC03
d. UMMSSC04

4. Vendors who fail to comply with this policy or the Perioperative Services Policy for vendors may be requested to leave at any time. Such incidents will be reported to the Perioperative Business Director/Nurse Manager/Director and the Director of System Materials and Contracts/Strategic Sourcing for review and further action as necessary.
5. Vendor Representatives must report to the individual hospital's designated Security Station to access the facility. Vendor rep will use the assigned kiosk to SIGN ON to web portal and print an adhesive badge. Note: Vendor representatives must be active in the vendor managed web portal database to obtain a vendor badge.
6. It is the responsibility of all vendors to maintain active registration and credentialing by working with our vendor management partner prior to entering any UMMS facility. Vendor reps are required to remain current for all credentialing prerequisite documents and criteria.
7. Credentialing criteria is approved by the appropriate Business Operations Director/Nurse Manager/Director, or designee. All required credentialing documentation has been vetted beforehand with UMMS and our vendor management partner - Intellicentrics.

Note: Minimal competencies for Clinical Technical Vendor Representatives entering sterile and direct patient care areas include (Requirements list available on vendor management website):

8. Certificate of liability when functioning in the role of "Technical Advisor."
9. Current resume or detailed list of employment history.

10. Current proof of negative annual TB Testing or if known positive Chest X-Ray report.
11. Proof of positive Varicella (Chicken Pox) titer or 2 vaccine doses.
12. Signed Confidentiality Statement required, if checked "YES" to providing financial support to UMMS a completed Agreement & Acknowledgement Statement Form faxed to Perioperative Services designee and Corporate Contracts/Strategic Sourcing.

B. PROCEDURE FOR VENDORS IN PERIOPERATIVE SERVICES

1. Employees may never request vendors to make gifts/contributions to any Perioperative Services areas or individuals. UMMS Policy PROE: 310, "Vendor Gifts to Individuals" should be referred to in order to guide the practice of Perioperative employees seeking contributions from vendors. UMMS employees must avoid conflicts of interest involving vendors by referring to UMMS policy PROE: 201, "Disclosure of Conflict of Interest"

Vendor representatives are restricted from operating rooms, procedural areas, and all other treatment areas except in the following circumstances:

a. The vendor representative is to function as a "Clinical Technical Advisor" to the physician, nurse, or other health care provider (HCP) regarding the use of their service, product or medical device. Under this circumstance the vendor must have on file proof of indemnity when functioning in the role of "Technical Advisor" as defined prior to functioning as such.
b. Vendor representatives functioning as a "Clinical Technical Advisor" for a product or medical device will be permitted in the operating room, procedural area or treatment area under the supervision of the attending surgeon and nursing staff caring for the patient.
c. Vendor representatives should be present only during the portion of the procedure for which their service, product or medical device is being used. While in the OR, procedural area, or treatment area, vendor representatives are not permitted to approach other physicians to detail their products.
d. Vendor representatives are prohibited on patient contact or participate in rendering care to a patient.
   Exception: *Vendors that provide service(s) that require placement of patient monitoring, patient specific fitting of device(s) etc., and while under the direction of the attending surgeon/physician.*

e. Telephones and other communications devices located in any OR, procedural area, or treatment area. Vendors may not use these telephones to conduct business or for personal calls.
f. Vendor representatives may not post literature, flyers, brochures, set up displays or conduct demonstrations of their products in any Perioperative Services location without prior notification and written permission of the Director Perioperative Services, Nurse Manager/Director
g. Vendors will not discuss service, products or medical devices in public areas in which patients, patient families and visitors are found. This includes elevators, cafeterias, food/beverage kiosks, food courts, restaurants within the facility and designated waiting areas.
h. To deliver services, products, or medical devices being considered and approved for evaluation and trial by the Value Analysis Committee and/or Capital Committee. Descriptive literature, instructions, user guidelines, and a valid purchase order must accompany the product or medical device. In-services for all staff who will be involved in an evaluation and trial of a product or medical device must precede the start of the clinical trial, including Sterile Processing staff for processing and sterilization purposes.
i. To expedite and assist in the removal of recalled/defective products when requested. Note: Any recalled/defective products remain the property of the facility according to their product policy.

2. Vendor representatives providing medical devices or equipment with a valid purchase order for a case must follow all guidelines as previously outlined in this policy in addition to the following:

a. Vendor representatives are to first deliver the medical device to the Department of Biomedical Engineering
b. The P.O. for authorization of delivery of the equipment to be tested will be provided to the Department of Biomedical Engineering.
c. An electrical safety check of the device will be completed.
d. Once successfully completed, the device can be transferred to a clinical area for use.

This section will be revised when the Loaner Instrument Case Tracking system is identified and (implemented)

3. Vendor representatives providing instruments or implantable products with a valid no-charge purchase order for a case must follow all guidelines as previously outlined in this policy.
4. When an attending surgeon calls the vendor directly, to request instruments, Vendor will notify the appropriate chain of command designated by each facility prior to transporting/receiving requested instruments/trays.
   a. Information should include patient name, surgeon, surgery date, and number of trays. SP will process tray as described per the manufacturer's recommendation and their respective hospital policy.
   b. Vendor representatives should arrange for the delivery of instruments or implantable products to the Department of Sterile Processing.
   c. All instrumentation and implantable products must be received in Sterile Processing no less than **(24) hours prior to the scheduled procedure**.
   d. All instrumentation trays/implantable products must be accompanied by a detailed inventory set list and a complete Received Instrumentation/Implantable Products Inventory Record.
   e. All instrumentation trays/implantable products must be accompanied by a detailed inventory set list and a complete Received Instrumentation/Implantable Products Inventory Record.
   f. The Sterile Processing Attendant accepting the instrumentation/implantable products will verify products received, count set contents and sign the record.
   g. A copy will be kept in the Sterile Processing department and a copy given to the vendor representative will serve as a record of receipt for the instrumentation and/or implantable.
   h. Instrumentation/implantable products should not be picked up without the Received Instrumentation/Implantable Products Inventory Record. If this is not possible, the vendor representative will be required to sign a statement identifying the delivery date of the instruments/implantable products, the case they were used for, and the date of pick up.
   i. Vendor representatives picking up instrumentation trays /implantable products should present their copy of the Received Instrumentation/Implantable Products Inventory Record in the Sterile Processing Department.
   j. Instrumentation will be returned only after it has been decontaminated according to manufacturer and regulatory standards. The vendor/courier is responsible for

verifying the instrument tray/implantable products inventory and the condition of the instrumentation at the time it is picked up.

k. The vendor representative's receipt will be matched with the original Sterile Processing copy and both will be maintained for 30 days.

j. This document will be matched with the original Received Instrumentation/Implantable Products Inventory Record and maintained for 30 days. Facilities will not be responsible for instrumentation/implantable products left over 14 days without a signed agreement or contract.

SCHEDULE A

PURCHASER'S AND AFFILIATES AND ADDRESSES:

University of Maryland Medical System Corporation — MD Tax ID # 31089288
d/b/a University of Maryland Medical Center (UMMC)
Federal Tax ID # 52-1362793
22 South Greene Street
Baltimore, Maryland 21201
Telephone: 410-328-3184

James Lawrence Kernan Hospital, Inc. — Tax ID # 31054639
d/b/a University of Maryland Rehabilitation
and Orthopaedic Institute
Federal Tax ID # 52-0591639
2200 Kernan Drive
Baltimore, Maryland 21207
Telephone: 410-448-2500

Maryland General Hospital, Inc. (MGH) — MD Tax ID # 31001457
d/b/a University of Maryland Medical Center
Midtown Campus
Federal Tax ID # 52-0591667
827 Linden Avenue
Baltimore, Maryland 21201
Telephone: 410-225-8000

Baltimore Washington Medical Center (BWMC) — MD Tax ID # 31001358
d/b/a University of Maryland
Baltimore Washington Medical Center
Federal Tax ID # 52-0689917
301 Hospital Drive
Glen Burnie, Maryland 21061
Telephone: 410-787-4000

Shore Health System, Inc. (f/k/a The Memorial — MD Tax ID # 31003024
Hospital at Easton) d/b/a University of Maryland

Shore Medical Center at Easton
Federal Tax ID # 52-0610538
219 S. Washington Street
Easton, Maryland 21601
Telephone: 410-822-1000

Shore Health System, Inc. (f/k/a Dorchester General Hospital) d/b/a University of Maryland Shore Medical Center at Dorchester
Federal Tax ID # 52-0610538
300 Byrn Street
Cambridge, Maryland 21613
Telephone: 410-822-1000
MD Tax ID # 31003024

Shore Health System, Inc. (f/k/a The Chester River Hospital Center, Inc.) d/b/a University of Maryland Shore Medical Center at Chestertown
Federal Tax ID # 52-0679694
100 Brown Street
Chestertown, Maryland 21620
Telephone: 410-778-3300
MD Tax ID # 31001705

Upper Chesapeake Health System, Inc.
d/b/a Upper Chesapeake Health System
Federal Tax ID # 52-1253920
500 Upper Chesapeake Dr.
Bel Air, Maryland 21014
Telephone: 443-643-1000
MD Tax ID # 31104194

Harford Memorial Hospital, Inc.
d/b/a Harford Memorial Hospital
Federal Tax ID # 52-0591484
501 South Union Ave.
Havre de Grace, Maryland 21078
Telephone: 443-843-5000
MD Tax ID # 31002646

Civista Medical Center, Inc.
d/b/a University of Maryland Charles Regional Medical Center
Federal Tax ID # 52-0445374
MD Tax ID # 31002349

5 Garrett Avenue
PO BX 1070
La Plata, MD 20646
Telephone: 301-609-4000
Toll Free: 800-422-8585

University of Maryland St. Joseph Medical Center, LLC d/b/a University of Maryland St. Joseph Medical Center
Federal Tax ID#35-2445106
7601 Osler Drive
Towson, MD 21204
410-337-1000
MD Tax ID#31205553

Mt. Washington Pediatric Hospital
Federal Tax ID # 52-0591483
1708 West Rogers Avenue
Baltimore, Maryland 21209-4596
Telephone: 410-578-8600
MD Tax ID # 31001713

University of Maryland Capital Region Health
DBA: University of Maryland Prince George's Hospital Center
Fed Tax ID: 52-1289729
3001 Hospital Drive, Cheverly, MD 20785
Telephone: 301-618-2000
MD Tax ID: 31083109

University of Maryland Capital Region Health
DBA: University of Maryland Laurel Regional Hospital
Fed Tax ID: 52-1289729
7300 Van Dusen Rd, Laurel, MD 20707
Telephone: 301-725-4300
MD Tax ID: 31083109

University of Maryland Capital Region Health
DBA: University of Maryland Gladys Spellman Specialty Hospital (located at U of M Laurel Regional Hospital
Fed Tax ID: 52-1289729
7300 Van Dusen Rd, Laurel, MD 20707
Telephone: 301-725-4300
MD Tax ID: 31083109

University of Maryland Capital Region Health
MD Tax ID: 31083109

DBA: University of Maryland Bowie Health Center
Fed Tax ID: 52-1289729
15001 Health Center Drive, Bowie, MD 20716
Telephone: 301-262-5511

University of Maryland Capital Region Health MD Tax ID: 31083109
DBA: University of Maryland Capital Region Surgery Center
Fed Tax ID: 52-1289729
14999 Health Center Drive, Bowie, MD 20716
Telephone: 301-809-2000

University of Maryland Capital Region Health MD Tax ID: 31083109
DBA: University of Maryland Family Health & Wellness Centers, with locations in Cheverly and Suitland
Fed Tax ID: 52-1289729
2900 Mercy Lane, Cheverly, MD 20785
Telephone: 301-618-2273
5001 Silver Hill Road, Suitland MD 20746
Telephone: 301-618-2273

University of Maryland Capital Region Health MD Tax ID: 31083109
DBA: University of Maryland Health & Wellness Center at Laurel
Fed Tax ID: 52-1289729
7350 Van Dusen Road, Laurel, MD 20707
Telephone: 301-809-2000

ATTACHMENTS:

Attachment A. Schedule of Affiliate Hospitals

RELATED POLICIES:

Policies:

A. SC01
B. SC02

C. SC03
D. Corporate Compliance Policy CC1205 False Claims Act and Whistleblower Protection Education

POLICY OWNER:

Supply Chain Management.

APPROVED:

Executive Compliance Committee Approved Initial Policy: [original]
Executive Compliance Committee Approved Revisions: [revisions]

Appendix 2 – PHARMACY VENDOR MANAGEMENT POLICY

POLICY:

To provide UMMS guidelines and procedures for receiving pharmaceutical sales representatives (PSRs~~)~~ or pharmaceutical vendors) while on the UMMS campuses for the purpose of promoting their product(s).

If any UMMS employee has a problem or question regarding the behavior of a vendor representative which is not specifically covered by this policy, they should contact the Purchasing Manager / Director or the Director of Pharmacy at their local facility. The local facility will then communicate to the pharmacy co-chair of the UMMS Pharmacy and Therapeutics (P&T) committee for tracking and action as needed. It should be remembered that the representative is a guest of UMMS and, as such, should provide services in accordance with accepted rules of conduct and in a manner which provides the greatest benefit to UMMS's patients and staff.

The University Of Maryland Medical System has adopted a value analysis approach to product evaluation and selection. Therefore, all factors will be considered in product selection including changes in clinical practice, the financial goals and objectives of the UMMS, and specific or special needs required to deliver an appropriate level of patient care. As an integral part of this process, several committees have been established to oversee the procurement and utilization of products, services and equipment within UMMS. The committee designated to oversee pharmaceutical products used within UMMS is the UMMS ~~Pharmacy and Therapeutics (~~P&T~~)~~ Committee.

The University of Maryland Medical System recognizes the value of these interactions and encourage staff personnel to interface with outside vendor representatives in order to obtain valuable information and maintain and improve the quality of care offered at UMMS. Such discussions, however, should be limited to scheduled appointments with ~~clinical~~ all staff (i.e.: providers, nurses, all pharmacy personnel, etc.) in accordance with this p~~P~~olicy and any applicable guidelines.

PROCEDURE:

I. Registration

A. All PSRs shall complete registration within the UMMS Supply Chain assigned vendor management web-based portal.

B. Medication Samples:

1. Medication samples and/or preprinted prescription pads shall not be brought into any UMMS hospital for any reason.
2. Medication samples may be allowed in ambulatory clinic locations per current regulations.
3. Pharmaceutical ~~D~~discount cards or patient assistance materials may be distributed to the appropriate staff during scheduled appointments in order to facilitate patient access to medications. Appointments for distribution of these materials, shall include but may not be limited to prescribers, care management and pharmacy.

C. UMMS Campus Access

1. All PSRs must have a previously scheduled appointment with staff (i.e.: providers, nurses, all pharmacy personnel, etc.) to be on UMMS campuses. It is unacceptable to enter UMMS hoping to find or track someone down. They should arrive just prior to their appointment and depart immediately thereafter.
2. A PSRs presence in or about patient care areas, medical staff offices, or other public or private areas in the UMMS for the purpose of making an appointment, or of detailing product or product lines will not be tolerated. Service representatives should make initial contact via telephone to schedule appointments. The use of UMMS's paging system is expressly prohibited by sales representatives.

    a. ~~It is the philosophy of the UMMS P&T Committee that a~~All in-services by PSRs for the purposes of educating on pharmaceutical products will be conducted by an UMMS pharmacist. Pharmaceutical displays, luncheons, conferences, seminars or other related group meetings are generally not allowed on UMMS campuses. Exceptions ~~will be allowed to be conducted by PSRs except~~to this tenant may be made on explicit approval of the Clinical Pharmacy Manager or Director of Pharmacy at the local site. Such approvals are not to be construed as blanket approval for future visits. Nothing in the above would prohibit employees of UMMS from choosing to attend in-services that are hosted outside of UMMS campuses and occur on their own time.

    b. PSRs are not permitted in patient care areas of the hospital without prior approval of the Department of Pharmacy Services. Any business will be conducted in private offices, conference rooms, break areas, cafeteria, or other prior approved area. Such approvals are not to be construed as blanket approval for future visits.

    c. Pharmaceutical Sales representatives (PSRs) calling on the Surgical Services Departments (including but not limited to Perioperative Services, Cath Lab, Interventional Radiology, etc.) must abide by visitation guidelines specific to that area in addition to this policy.

d. It will be the responsibility of the delegated authority of each department or modality to notify the Pharmacy ~~Manager~~Director, or his designee, of pending appointments with pharmaceutical representatives prior to the vendor representative coming into the departments.

e. UMMS recourse:

It is the responsibility of any UMMS employee to report any violation of this policy by a PSR to the Purchasing Manager / Director or the Director of Pharmacy at their local facility. The local facility will then communicate to the pharmacy co-chair of the UMMS Pharmacy and Therapeutics (P&T) committee. Actions taken by the UMMS P&T committee as a result of infractions by a vendor representative (i.e. PSR) of this ~~P~~policy or related guidelines will be defined by the UMMS P&T committee and include but are not limited to:

i. First violation: 1 month revoked access to all system campuses
ii. Second violation: 6 months revoked access to all system campuses
iii. Third violation: lifetime revocation of access to all system campuses

f. All violations will be tracked in the UMMS Supply Chain assigned vendor management web-based portal.

g. All violations will be applicable across the system for the individual representative, and all violation occurrences will be reported up through the system P&T committee.

h~~g~~. Occurrences will also be accompanied by a letter to the representative's manager making them aware of the vendor policy and violation of their employee.

i~~h~~. Deliberate violation of this Policy by UMMS staff will be handled in accordance with the UMMS Code of Conduct and applicable Human Resources policies.