

**Beth Israel Deaconess Medical Center
BIDMC Manual**

Title: Industry Representative Code of Conduct (formerly named: Vendor Access Policy)

Policy #: ADM-02

Purpose: To provide clear policies and procedures for Vendor Representatives when visiting Beth Israel Deaconess Medical Center (BIDMC).

Policy Statement:

It is the goal of Beth Israel Deaconess Medical Center to maintain a clearly defined and professional relationship with representatives as defined in Attachment A – Vendor Representative Classification Matrix. It is the intent of this policy to define the parameters by which representatives may conduct business while ensuring that the delivery of patient care is not interrupted or adversely affected at the Beth Israel Deaconess Medical Center. All departments shall be responsible for developing and publishing guidelines for implementation of this policy. This policy applies to all representatives doing business on hospital premises.

Note:

- Additional guidelines for industry representatives in the perioperative setting are provided in policy [#PSM400-320: Industry Representatives in the Perioperative Setting](#).
- Guidelines for the attendance of trainees and other non-industry visitors who visit BIDMC through graduate medical education programs are provided in policy [#GME-09: Guidelines for Graduate Medical Observation Experience](#). This includes fellowship and residency candidates.

Procedure(s) for Implementation:

A. Responsibility for Implementation:

Each department is responsible for establishing and documenting check in policies specific to their department's hours of operations, organizational structure and credentialing requirements. They are also responsible for enforcement of the policy.

B. Representative Registration:

All representatives must first complete an on-line registration process, managed through Vendor Credentialing Service, in order to conduct on-site business. Registration can be accessed directly through <http://www.symplr.com/>. Representatives will be required to provide contact information and upload documentumentation as described in the Vendor Representative Classification Matrix (Attachment A) to become a "registered representative".

At a minimum, the following information will be required:

1. Representative's name
2. Company name
3. Telephone number where (s)he may be contacted during normal business hours
4. Vendor's immediate supervisor name.
5. Telephone number where supervisor can be contacted
6. The representative's 24-hour emergency number

C. *Appointments*

All representatives shall have a previously scheduled and confirmed appointment with the individual(s)/department(s) they wish to visit prior to arriving at Beth Israel Deaconess Medical Center. Departments may issue standing invitations to representatives with the approval of the Department Chief or Administrative Director. Representatives are not permitted to roam the corridors, unless this is part of the representatives' duties. Representatives may participate in in-service education or training programs upon invitation by authorized hospital department personnel. Representatives may not otherwise be in attendance at any conference, rounds or discussions, formal or informal, where individual patients or any collective patient care matters are being presented or discussed, unless this is part of the representatives' duties.

D. *Emergency Situations*

In an emergency situation, which shall be defined by the physician responsible for the patient's care, a representative may be called to Beth Israel Deaconess Medical Center without an appointment. It is the responsibility of the department to manually approve the representative's access in accordance with this policy in an expedited manner. Access may be manually overridden by an authorized hospital administrator or user.

E. *Sign in Procedures*

All representatives with approved appointments at Beth Israel Deaconess Medical Center must sign-in through one of the designated sign-in/sign-out kiosks at the following locations:

- East Campus – Feldberg Lobby
- West Campus – West Clinical Center Elevator Bank

While both kiosks are available at all times, the West Campus is the only campus open twenty-four hours a day, seven days per week.

F. *Identification Badges*

Upon signing in (See Section D above) representatives will be issued a badge by the kiosk, which must be prominently displayed at all times while on campus. Company-supplied name badges may also be worn.

G. Consent

Vendor representatives may not be present during any patient procedures without obtaining proper consents:

Patient Consent is required during all of the following situations:

1. Observation
2. Technical Support

Prior to the start of the procedure, consent must be obtained (where applicable) from the **Patient** and at least one of the following:

1. Physician
2. Anesthesiologist
3. Nurse Manager or Designee

Consent must be documented in the chart. In the case where a chart does not exist, verbal consent may be obtained and recorded in the electronic medical record. In an emergency situation in which the representative has the expertise that would contribute to a positive outcome, the physician must make a note on the chart and inform the family as soon as possible after the procedure. All representatives called in an emergency situation must have been previously “cleared” regarding competency through the basic education offering.

Life-threatening emergencies may constitute an exception to obtaining consent prior to the procedure. In those cases in which the presence of an Industry Representative would contribute to the likelihood of a more positive outcome for the patient, the surgeon will include a note in the patient’s chart.

H. Representative Code of Conduct

1. Representatives are permitted only in physician offices, procedure rooms, or Perioperative Services with a prior appointment and appropriate consents.
2. Representatives are expected to abide by the Beth Israel Deaconess Medical Center’s Code of Conduct and HIPAA Privacy policy pertaining to access and disclosure.
3. Never shall a vendor, BIDMC staff/employee, and/or physician suggest or offer incentives to anyone to use or promote a product.
4. Under no circumstances will vendors review or read a patient’s chart or other aspect of their medical record unless this is part of the representatives’ purpose for being here. Vendors should avoid all contact with documents containing unique patient identifiers unless this is part of the representatives’ purpose for being here. In an emergency situation, it is the responsibility of the department to obtain the proper consents as soon as the situation is stabilized.
4. Patient Confidentiality is required. All representatives will keep all

information about a patient confidential and will not disclose or reproduce such information for any purpose at any time. The representative is bound by this policy at all times during and after his/her visit to Beth Israel Deaconess Medical Center. Failure to do so will result in immediate restriction from the Beth Israel Deaconess premises and potential legal action.

5. Representatives are not allowed to be involved in direct patient care.

I. Maintaining Credentials

It is the representatives' responsibility for monitoring their ongoing continuing education and health screening requirements, as further described in the Minimum Credential Standards (Exhibit B). Credentials are required to be updated with SYMPLR annually, unless otherwise specified by industry standards or required by department.

J. Breach of Policy

Any employee who sees a Vendor Representative within the Beth Israel Deaconess Medical Center without a Visitor Identification Badge should report it immediately to the Beth Israel Deaconess Medical Center Office of Compliance and Business Conduct.

1. Breach of Policy by Industry Representatives

- a. It is at the discretion of Beth Israel Deaconess Medical Center to determine the appropriate response to a breach of this policy. Responses could include a warning up to and including restriction from Beth Israel Deaconess Medical Center premises.
- b. Breaches of this policy should be reported to the Director of Contracting, who will collaborate with the reporting department and the Office of Compliance and Business Conduct regarding the following actions:
 - i. First Offense: Contracting will counsel the representative and place documentation in the Industry Representatives file.
 - ii. Second Offense: Contracting will restrict access to the Industry Representative and send a letter to his/her immediate supervisor.
 - iii. Third Offense:
 1. A letter will be sent to the Industry Representative and his/her Supervisor, resulting in banning of the Industry Representative for business at BIDMC.
 2. Review of current business at BIDMC will be evaluated to determine further actions with the company.

2. Disciplinary Action for Beth Israel Deaconess Medical Center Employee and Medical Staff.

- a. Employees - Disciplinary action in accordance with Medical Center policy.# [PM-04 Corrective Action](#)
- b. Physicians - Reporting to Chief of service and will result in

disciplinary action up to and including termination of privileges in accordance with Beth Israel Deaconess Medical Center by-law

K. Training

Each department will be responsible for communicating this policy to their vendor representatives and employees. On-going training on the use of Vendor Credentialing Service's website may be provided through webinar/webex as desired by department.

[Attachment A: Vendor Representative Classification](#)

[Attachment B: Minimum Credential Requirements](#)

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Eliminated:

References:

[Attachment A: Vendor Representative Classification](#)

[Attachment B: Minimum Credential Requirements](#)

[ADM-51 Visiting Industry Scientists - Attendance at Educational Conferences](#)

www.Symplrdatabase.com

[PSM400-320: Industry Representatives in the Perioperative Setting.](#)

[PM-04 Corrective Action](#)

[GME-09: Guidelines for Graduate Medical Observation Experience](#)

American Council of Surgeons (ACS)

http://www.facs.org/fellows_info/statements/st-33.html

The Association of Peri-Operative Registered Nurses (AORN)

The Role of the Health Care Industry Representative in the Perioperative/Invasive Procedure Setting

<http://www.aorn.org/PracticeResources/AORNPositionStatements/>

The Joint Commission

Health Care Industry/Vendor Representatives

http://www.jointcommission.org/mobile/standards_information/jcfaqdetails.aspx?StandardsFAQId=92&StandardsFAQChapterId=5

Centers for Disease Control

Immunization of Health-Care Workers

<http://www.cdc.gov/mmwr/preview/mmwrhtml/00050577.htm>