

# Ascension Vendor Access Policy

Updated June 5, 2023



**Ascension**



## Ascension Vendor Access Policy

---



The Resource Group and Ascension are grateful for our vendors' invaluable support to caregivers through assistance with procedures and delivery of training.

Our goal is to support safe, effective care at the lowest cost, so we can serve our communities, giving special attention to the poor and vulnerable.

We trust that our vendors have a similar goal of providing care to patients and want to support our goal as well.

# Policy Detail

## Policy Detail

# Scope

### WHO

“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.

- *Third Party Couriers delivering to or picking up instruments and/or implants on behalf of a Vendor are not considered Vendor Representatives but are required to comply with local facility visitor policies*

### WHAT

All requirements apply to onsite visits. Applicable requirements apply to virtual visits and electronic/verbal communication.

### WHERE

The Ascension Vendor Access Policy applies to all Ascension Participant sites of care, both acute and non-acute.

- *Ascension Living is excluded*

# Scope

- The following are not considered Vendor Representatives for the purposes of this policy:
  - 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
  - Third-party representative providing care or services directly to patients on behalf of the Ascension Participant

Please note: Post-Acute Representatives are not considered Vendor Representatives, but are defined and addressed separately in the policy

# Policy Layout and Included Procedures

- The [Vendor Access Policy](#) now links to a [Vendor Access Support Procedure](#) that contains process and operational guidelines.
- The [Short-Term and Long-Term Loaner Set Management Procedure](#) is linked within the Vendor Access Support Procedure.

All procedures linked through the Vendor Access Policy are considered components of the Vendor Access Policy.

As such, any non-compliance to the guidelines and requirements within these procedures will result in the consequences outlined in the Vendor Access Policy.

# Credentialing

All vendor representatives must be credentialed through symplr, our contracted vendor credentialing system

- Symplr maintains:
  - Representative contact information
  - Immunizations records
  - Background check
  - Agreement/Acknowledgment to policies
- Each acute care facility has one or more symplr kiosks where representatives can check in and out
  - Mobile app can be used where no kiosks are present



# Criteria for Entry

- Vendor Requirements
  - Sign in and sign out
  - Display sticker badge denoting level of access
  - Wear identifying bouffant cap in procedural areas
- In non-acute settings where kiosks are unavailable, representatives will utilize symplr mobile app to sign in, display badge, and sign out

## Access Levels

1

All Access (all procedural and patient care areas)  
**Multiple Immunizations Required**

2

Patient Care Access (excludes procedural areas)  
**Multiple Immunizations Required**

3

Administrative/Provider Access (excludes all patient care areas)

# Approved Circumstances for Entry

Vendor Representatives are permitted to enter Ascension sites of care for the following reasons:



Includes instrument/implant drop off & pickup

**When signing in through symplr, vendor representatives will be required to select a reason for entering the facility. This is tracked and monitored.**

# Approved Circumstances for Entry

1

Support an approved medical procedure/ provide direct patient assistance

Includes instrument/implant drop off & pickup

The Ascension Vendor Access Policy refers to a [list of approved procedures](#) that vendor representatives may support if requested by physicians. This list also includes approved products for which a vendor representative may enter to provide direct patient assistance.

This list is linked in the policy for reference.

For both procedure and patient assistance, products must be on contract.

Exceptions may be made for emergency circumstances that will affect patient care as determined by physician.

# Approved Circumstances for Entry

2

Provide approved  
in-servicing/  
education

All in-servicing and training/education must be submitted and approved through The Resource Group's process

- To initiate a request, Vendor Representatives must complete and submit the [Training Request Form](#) housed on [The Resource Group's website](#)
- In collaboration with Clinical Professional Development and the National Pharmacy Education Team (when appropriate), The Resource Group evaluates each request and provides the response to Vendor Representatives
- If approved, Vendor Representative schedules directly with appropriate parties

Approvals/Denials are provided within ten (10) days of submission.

# Approved Circumstances for Entry

3

Perform requested  
product,  
equipment, or  
facility  
maintenance

Prior approval to perform product, equipment, or facility maintenance is not required to come onsite; however, all maintenance personnel must be invited by the appropriate Ascension personnel such as:

- The Resource Group
- Medxcel
- Trimedx
- Ascension Technologies

# Approved Circumstances for Entry

4

Complete  
requested  
consignment  
inventory count

- To perform consignment inventory count, Vendor Representatives must be invited by The Resource Group
- These counts should occur in accordance with the requirements set forth in the vendor's agreement with The Resource Group

Inventory Counts should occur under supervision of a Resource Group associate.

# Approved Circumstances for Entry



Ascension accepts samples, vouchers, and coupons under limited circumstances:

- **Acute Locations**
  - No product samples, with the following exceptions:
    - Glucose meters, specialty infant formula, pediatric and adult nutritionals/supplements
  - Pharmaceuticals
    - Vouchers and Coupons (no physical samples) of approved drugs permitted (list of approved drugs is linked [here](#))
- **Non-Acute Locations**
  - No product samples, with the following exceptions:
    - Glucose meters, specialty infant formula, pediatric and adult nutritionals/supplements
  - Pharmaceuticals
    - Vouchers, Coupons, and Samples of approved drugs permitted (list of approved drugs is linked [here](#))

When dropping off approved vouchers, coupons, and samples, Vendor Representatives will not have access to facility beyond the front desk or have access to clinicians.

# Vendor Access to Areas, Patients, and Patient Information

Areas	Patients	HIPAA
<ul style="list-style-type: none"><li>• Credentialing level will dictate facility access</li><li>• Vendor Representatives will not have access to patient care areas unless clinically necessary</li><li>• Vendor Representatives are permitted in physician lounges only if invited and may be asked to leave at any time</li></ul>	<ul style="list-style-type: none"><li>• Vendor Representatives will not have direct access to patients unless clinically necessary</li><li>• If patient is conscious, Vendor Representative must introduce self and explain role in patient's care</li></ul>	<ul style="list-style-type: none"><li>• Vendor Representatives may only access the minimum amount of patient information necessary to provide patient care, as permitted by HIPAA guidelines</li></ul>

# Incoming Products and Equipment

### Off-Contract Products

- Off-contract products brought in without a purchase order are not permitted unless approved by The Resource Group
- Off-contract products are permitted in emergency circumstances where access to the product affects patient care

### Demonstration/Loaner Equipment

- Vendor Representatives must receive a zero-dollar purchase order for demonstration or loaner equipment prior to its arrival on premises
- Biomedical engineering safety check is required before use

### Instruments/Sterilization

- Vendor Representatives must follow all guidelines within the [Short-Term and Long-Term Loaner Set Management Procedure](#).
  - Instruments/implants should be brought in no earlier than 96 hours prior to procedure, but no later than 48 hour prior to procedure
  - Instruments should be picked up within 48 hours after procedure

### Product/Equipment Storage

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

# Prohibited Activities

- Vendor Representatives may not engage in sales, marketing, or advertising activities
  - Delivering sales presentations
  - Administering unapproved product trials
  - Promoting off-contract products
- Where The Resource Group initiates business, Vendor Representatives may not share contract proposals, terms, or pricing of the proposed or actual relationship with Ascension associates outside The Resource Group.

## Counter detailing is prohibited

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.

Counter detailing to local leaders or others during national contract negotiations will also be considered a violation

# Prohibited Activities

- Direct selling activities
- Providing food to caregivers and staff
- Providing gifts to caregivers and staff
- Providing promotional items to caregivers and staff
- Counter detailing activities
- Sharing contracting details with associates outside of The Resource Group (where The Resource Group initiates activities)

# Consequences/Enforcement

# Vendor Consequences

1

### First Violation by Vendor

- Individual Vendor Representative **permanently banned** from all Ascension facilities
- Ascension will not offer suspension periods

2

### Second Violation by Vendor

(same product or service category\*)

Consequences may include any of the following:

- Apply a penalty during next bid process
- Permanently ban all 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

\*The Resource Group will determine how products/services are categorized

# Monitoring Compliance

All Ascension associates have been informed of and trained on this policy

Associates will notify The Resource Group if they observe representatives:

- Accessing the facility for an unapproved reason
- Accessing the facility without a valid symplr badge displayed
- Accessing an area of the facility not appropriate for the purposes of the visit
- Accessing patient or facility information inappropriately
- Engaged in sales, marketing or advertising activities
- Sharing details of a contract negotiation with associates outside of The Resource Group
- Providing gifts, food or other items of monetary value to associates
- Delivering unapproved samples
- Behaving unethically or unprofessionally

## Symplr Data Monitoring

- The Resource Group will analyze symplr data on an ongoing basis to verify vendor representative activities are aligned with those permitted in policy
- The Resource Group may reach out to vendors to verify past activities as needed
- **If you would like your entire organization red-lighted in symplr to minimize the risk of non-compliance, please let us know**

### First Violation

- Facility Regional Integration Officer will ban vendor representative in symplr system as the violation is reviewed by the National Violation Team
  - Regional Integration Officer will coordinate with vendor to identify replacement representative if required
- Upon review and final confirmation by the National Violation Team, The Resource Group delivers a formal letter to violating representative and national account representative and permanently bans the account representative

### Second Violation

- Facility Regional Integration Officer will ban vendor representative in symplr system as the violation is reviewed by the National Violation Team
  - Regional Integration Officer will coordinate with vendor to identify replacement representative if required
- Upon review and final confirmation by the National Violation Team, The Resource Group delivers a formal letter to violating representative and national account representative and permanently bans the account representative
- A Review Board committee will evaluate situation to determine which additional actions as stated in the policy will be pursued
  - The Resource Group will coordinate with vendor to communicate decisions and next steps

## Contact Information

---

# Thank You....

We appreciate your continued support as we work to promote a safe and secure environment for our caregivers to deliver effective care.

Delivery of the highest quality care to our patients, at the best value, is our main priority and we are grateful for your cooperation.

The Ascension Vendor Access Policy and related documents and resources are located on The Resource Group's website:

- <https://www.theresourcegroup.com/suppliers>

If you'd like additional training opportunities or have questions, please contact us!

### [The Resource Group Supplier Inquiry](#)

- [Select Ascension Vendor Access Policy](#)

