



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

Table of Contents

I.	Purpose.....	1
II.	Definitions	1
III.	Procedure.....	3
	A. Scope.....	3
	B. Vendor Representatives	3
	C. Vendor Representative Access/Appointments	4
	D. Identification/Badge Requirements	4
	E. Vendor Surgical Attire (RepScrubs).....	5
	F. Contractor Personnel and Construction Contractor Personnel.....	5
	G. Contractor Personnel and CCP who Engage In Sales or Marketing Activities	8
	H. Work Performed by Contractor Personnel and CCP In Patient Care Areas	8
	I. Visitors	8
	J. Procedures and Limitations Governing Vendor Representatives and Contractor Personnel ...	9
	K. Criteria for Delivery & Use of General Supplies, Medical Supplies and Medical Equipment..	11
	L. Sanctions	11
IV.	References.....	12
V.	Attachments	13

I. Purpose

The purpose of this Policy is to regulate the presence and movement of Vendor Representatives, Contractor Personnel, Construction Contractor Personnel, and Visitors while on Jackson Health System (JHS) Premises. The procedures and requirements of this Policy have been established to provide a secure environment to protect the efficiency and integrity of physicians, other health care providers and employees; to support patient safety, privacy and family-centered care; and to maintain the integrity of the procurement process. This Policy also supports Public Health Trust (PHT) policy against unauthorized vendor influence. The activity of Vendor Representatives, Contractor Personnel and Visitors must be coordinated and controlled to meet the JHS need for security, transparent business practices, and to maintain patient safety and the standard of care.

II. Definitions

The following terms used in this Policy shall have the following meaning, except when it is clear from the context that another meaning is intended:

Construction Contractor Personnel (CCP): Companies under contract with JHS to perform construction renovations or new construction. Construction Contractor is responsible for validation of all construction contract personnel:

- Negative Urine Drug test: 5 panel Drug Screen or equivalent.
- Criminal Background Check (if inside an operating business unit).



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- OSHA 10 training certification.
- Legal right to work in USA.
- Must be able to provide a daily list of attendees on a JHS Campus.

For certain Construction Contract leadership personnel, or those whose work will require access to patient care areas not normally accessed by visitors, will be required to comply with this policy as if a contract employee or JHS employee.

Contractor Personnel – Contractor Personnel is any person working on JHS Premises pursuant to an existing contract with JHS limited to the products and services presently included under that contract. Construction Contractor Personnel (CCP) are exempted from this definition. Contractor Personnel must be sponsored and accountable to a JHS user department and include, for example: routine service/maintenance personnel, agency nurses, other temporary staffing personnel, company service technicians, consultants, and company personnel assigned to work at JHS under outsourcing contracts. Contractor Personnel must adhere to the Identification/Badge requirements set forth in Section V. of this Policy. Contractor Personnel must obtain and display a Permanent Badge titled “Contractor” that expires annually.

JHS Employee – Means all executives, clinicians, managers, staff (clinical, administrative, and technical), interns, residents, and fellows, whether full-time, part-time or temporary, who are presently on the JHS payroll.

JHS Medical Staff Member – Includes any member of the medical staff who is credentialed to provide healthcare services at any clinical facility operated by the Jackson Health System, including, but not limited to, University of Miami and Florida International University clinicians and community-based physicians.

JHS Premises – For the purposes of this Policy, JHS Premises includes the following buildings: all in-patient buildings that are part of Jackson Memorial Medical Center (JMMC) Campus, Holtz Children’s Hospital, Jackson Behavioral Health Hospital, Christine E. Lynn Rehabilitation Hospital, Ryder Trauma Center, Jackson North Medical Center (JNMC), Jackson South Medical Center (JSMC), Jackson West Medical Center (JWMC), and all JHS Urgent Care Centers and Satellite Facilities. In addition, any property owned or utilized by JHS including JHS property leased to vendors or retail establishments (e.g. Au Bon Pain) are considered JHS Premises. The President/Chief Executive Officer may place additional JHS facilities on this list by notifying the JHS Division of Public Safety/Security Services Department in writing.

Permanent Badge – This is the hard, plastic badge issued by the JHS Division of Public Safety/Photo ID & Fingerprinting Services to qualifying Contractor Personnel and Construction Contractor Personnel under this Policy. This badge expires on January 14 of each year or earlier depending on the length of the contract. This badge is the property of JHS and must be worn in a visible location above the waist at all times while on JHS Premises. Expired badges must be returned to Public Safety/Photo ID Services or may be confiscated.

Reprax – Provided by IntelliCentrics, is a web driven software service that aids in the credentialing and monitoring of sales / services representatives, in our healthcare environments. This solution allows us to enforce policies for vendor management and compliance. The tool helps to track and manage vendor credentialing, track vendor activity, adherence to policy and vendor behavior. All vendor representatives and service providers need to use Reprax.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

Temporary I.D. – This is the paper badge issued to all Visitors on a daily basis by the JHS Division of Public Safety’s Visitor Management Station to all Visitors under this Policy. This badge expires daily and contains a photo, name, date, time of entry, destination and daily expiration date. Individuals wearing a Temporary I.D. are only authorized to access the destination designated on the badge and public areas, such as the cafeteria and gift shop. Vendor Representatives and service personnel should not be using temporary visitor paper badges.

Vendor Representative – A Vendor Representative is any person, acting as an agent of an entity or on his or her own behalf, who visits JHS Premises for the purposes of marketing, selling or promoting utilization and the exchange of goods or services to the PHT, JHS Medical Staff Members or JHS Employees. This includes, but is not limited to: Pharmaceutical, Supply, Equipment, service providers and other Sales Representatives, regardless of whether they presently hold contracts with JHS.

Visitor – A Visitor is any person on JHS Premises who is not a patient, Vendor Representative, Contractor Personnel, JHS Employee, JHS Medical Staff Member, or University of Miami employee working on JHS Premises. Visitors must adhere to the Identification/Badge requirements set forth in Section V. of this Policy.

III. Procedure

A. Scope

1. This Policy applies to all Vendor Representatives, Contractor Personnel, Construction Contractor Personnel, and Visitors while on JHS Premises as defined herein.
 - a. Patients are not considered Visitors and are not covered by this Policy.
2. All JHS Executives, Medical Staff Members, Managers, Supervisors and Staff, as well as University of Miami employees working on JHS Premises, are responsible for ensuring compliance with this Policy as it applies to Vendor Representatives, Contractor Personnel and Visitors within their respective work areas.
3. The Division of Public Safety is authorized to deny access to JHS Premises to Vendor Representatives, Contractor Personnel, Construction Contractor Personnel, and Visitors who fail to comply with any requirement of this Policy.

B. Vendor Representatives

1. Lobbyist Registration
 - a. Pursuant to Section 2-11.1(s), of Miami-Dade County’s Conflict of Interest Code of Ethics Ordinance, a “lobbyist” is any person, firm or corporation seeking to influence the adoption, modification or defeat of legislation; or any action, decision or recommendation of the Mayor and the Board of County Commissioners (Board).
 - b. Additionally, a lobbyist is defined as any person seeking to influence any action, decision or recommendation of County Personnel or any public collegial body with delegated authority to act or make decisions or recommendations on the Board’s behalf such as a council, trust, task force or review committee.
 - c. The principal and any employee whose normal scope of employment includes lobbying activities is a lobbyist, pursuant to the ordinance.
 - d. Please visit the Miami Dade County Clerk of the Board website for additional information and forms:
 - i. <https://www8.miamidade.gov/Apps/COB/LobbyistOnline/Home.aspx/Home.aspx>
2. Vendor Registration
 - a. In addition to the foregoing, all contracted vendors/manufacturers are required on an annual basis to register with the PHT’s Procurement Management Department by



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

completing a Vendor Registration Application prior to receiving or renewing a contract award.

- i. Detailed instructions may be obtained by accessing the Department's Vendor Portal website at <https://jhsmiami.org/VendorPortal/Display.cfm>.
- ii. Registration and regular entry into Reptrax is required.

C. Vendor Representative Access/Appointments

1. Vendor Representatives must have a scheduled appointment to visit JHS Premises.
 - a. Unsolicited visits are prohibited.
 - b. All appointments on JHS Premises must be made by the Vendor Representative, in advance, regardless of whom the Representative would like to visit.
2. Vendor Representatives are not permitted to meet professional staff in any patient care unit, including inpatient units, nursing stations, physician lounges, outpatient clinics (patient areas), perioperative and operative areas and the Emergency Department.
 - a. Vendor Representatives must conduct meetings **ONLY** in offices or non-clinical conference rooms affording privacy.
 - b. Vendor Representatives are barred completely from the Intensive Care Units (ICUs).
 - i. One exception, subject to case-to-case approval by JHS, may be for a non-pharmaceutical vendor entering as a subject matter technology expert in the role of technician or consultant pursuant to department policy and guidelines.
 - c. Access is limited to the office or conference room they have been authorized to visit.
 - d. No lingering or socializing in any hospital hallway will be permitted.
 - e. Meetings shall not be permitted in JHS public areas such as cafeterias, hallways, telephone areas, elevators and parking garages, nor in inpatient care units.
3. Due to patient confidentiality concerns, Vendor Representatives are not permitted to attend any conferences or reports at which protected health information is shared.
 - a. Vendor Representatives may not:
 - i. See patients
 - ii. Review their charts or any portion of the patient medical record.
 - iii. Whether in electronic or paper format
 - iv. Go on rounds or attend surgery.
 - b. Vendor Representatives are prohibited from all clinical areas and conference rooms on inpatient units where there may be potential for patient health information to be shared.

D. Identification/Badge Requirements

1. JHS utilizes the Reptrax vendor credentialing system.
2. All vendors who wish to gain access to our facilities are required to register by visiting www.Reptrax.com.
3. Vendor Representatives (including service providers), who visit JHS Premises, may do so via registration in Reptrax and will not obtain a Permanent Badge. They will be issued a sticker and/or electronic badge.
4. Agreement to abide by the terms and conditions of the JHS Vendor/Contractor/Visitor Access & Activity Policy and all JHS/PHT Policies governing vendor conduct is required.
5. Once the Vendor Representative has submitted the required "JHS Vendor Representative Application Form", completed the Reptrax requirements and information as outlined above, if approved, the vendor representative will be able to print a vendor sticker badge that must be worn.
 - a. This process signifies completion of the JHS Vendor Representative requirements and must be followed.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- b. A sticker or electronic badge must be worn by the Vendor Representative in a visible location above the waist at all times when he/she is on JHS Premises.
 - c. They will need to log in to Reprtrax every visit and exit.
 6. Representatives of the Procurement Department, the Pharmacy Department, and/or the Public Safety Department may request and confiscate a vendor's pass for any act(s) of non-compliance with this Policy.
- E. Vendor Surgical Attire (RepScrubs)
1. All Vendors entering the semi-restricted and restricted areas of the Operating Room and Cath Labs are required to purchase and wear RepScrubs.
 2. JHS has implemented the RepScrubs Surgical Attire Program effective May 9, 2016; and all applicable Vendor Representative(s) under this program are required to adhere to the following requirements:
 - a. RepScrubs disposable attire dispensed only at JHS facilities within eight (8) hour period per day will be considered valid attire under this program.
 - b. Vendor Representative(s) must wear valid RepScrubs disposable attire and red disposable head covers at all times during visits to restricted areas outlined below.
 - c. RepScrubs disposable attire dispensed at JHS facilities must be worn in the following semi-restricted and or restricted areas:
 - i. Operating Rooms.
 - ii. Trauma Center Operating Suites.
 - iii. Interventional Radiology Suites.
 - iv. Cardiovascular Surgical Suites.
 - d. Vendor Representative(s) must be in compliance with JHS's Perioperative Services, Policy No. 130 – Attire in Surgical and Procedural Areas.
 - e. Vendor Representative(s) must maintain a valid membership and be compliant with JHS requirements under the Reprtrax Vendor Credentialing system.
 3. Any Vendor Representative found to be non-compliant with the above requirements under this program will be denied access to all restricted areas as outlined, as well as being denied Reprtrax access at all JHS facilities.
- F. Contractor Personnel and Construction Contractor Personnel
1. Identification/Badge Requirements
 - a. All agency personnel, including nurses and other temporary staff, and all contractor personnel assigned to work at a JHS facility under an outsourcing contract must comply with the Identification/Badge Requirements established by the Division of Human Resources Capital Management, the Division of Public Safety and the JHS Central Staffing Office.
 - i. For purposes of this Policy, all agency personnel, including nurses and other temporary staff, and all Contractor Personnel assigned to work at a JHS facility under outsourcing contracts are excluded from the Identification/Badge Requirements described below.
 - b. Contractor Personnel, except as excluded in Section F.1.a.i above, who intend to work on a JHS Premises for 23 business days or less during a 12-month period must check in at a designated Reprtrax management station where they will be issued a sticker if they meet the requirements to enter the facility.
 - i. For CCP, a Temporary I.D. by the JHS Division of Public Safety will be issued.
 - ii. The Temporary I.D. will include his/her photo, name, date, time of entry, destination, and a date of expiration.
 - iii. Contractor Personnel shall display the Reprtrax sticker and the Temporary I.D. in a visible location above the waist at all times while on JHS Premises.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- iv. CCP shall display the Temporary I.D. in a visible location above the waist at all times while on JHS Premises.
- c. Contractor Personnel, except as excluded in Section F.1.a.i above, and including CCP, who intend to work on a JHS Premises for more than 23 business days during a 12-month period, or who have in fact worked on a JHS Premises for more than 23 business days during a 12-month period, shall obtain a Permanent Badge issued by the JHS Division of Public Safety/Photo ID & Fingerprinting Services.
 - i. The badge will state the sponsoring JHS Department and will include an expiration date.
 - ii. To obtain a Permanent Badge, the Administrator or Director within the sponsoring JHS Department must complete, sign and submit a “Contractor Personnel Access/Badge Request Form” to the Director of the Procurement Management Department.
 - iii. The Procurement Department may authorize persons at JNMC, JSMC, or JWMC to receive/process applications and scan/send such applications to the Central Procurement Department for Director, Procurement Management Department approval as well as to Human Resource Capitol Management (HRCM) for Compliance Administrator, Human resources approval.
- d. The Permanent Badge is the property of JHS.
 - i. Contractor Personnel and CCP shall display the Permanent Badge in a visible location above the waist at all times while on JHS Premises.
 - ii. All contractor badges will expire on Jan 14th of each year regardless of the date of issuance, or at the date of the expected work period end, whichever is earlier.
 - iii. Upon the expiration or termination of their contract, Contractor Personnel and CCP must return their Permanent Badge to the JHS Division of Public Safety/Photo ID & Fingerprinting Services.
 - iv. The sponsoring JHS department is responsible for enforcing this provision and all the vendor credentialing requirements.
 - v. If the Permanent Badge is lost, the Contractor Personnel and CCP or their employer shall immediately report the loss of this badge in writing to the JHS Division of Public Safety, which will prepare an incident report.
- 2. Contractor Personnel and CCP Access/Appointments
 - a. Contractor Personnel and CCP Access is limited to areas directly related to the work being performed at JHS facilities.
 - b. Contractor Personnel access to restricted or secured areas will need to be coordinated through the Project Manager, Public Safety and User Department.
 - c. JHS keys shall not be assigned to Contractor personnel at any time.
 - i. Contractor Personnel and CCP are allowed to install construction keyways, if applicable, to any area under construction or renovation, however copies of the “C keys” must be provided to the Project Manager and Public Safety.
 - ii. Upon completion of the project, construction keyways must be removed and replaced with JHS approved hardware and keyways (if applicable).
 - d. Contractor Personnel and CCP are not permitted to meet professional staff in any patient care unit, including inpatient units, nursing stations, physician lounges, outpatient clinics (patient areas), perioperative and operative areas and the Emergency Department.
 - i. No lingering or socializing in any hospital hallway will be permitted.
 - ii. Meetings shall not be permitted in JHS public areas such as cafeterias, hallways, telephone areas, elevators and parking garages, nor in inpatient care units.
 - e. Contractor Personnel and CCP must have a scheduled appointment to visit JHS Administrative and Executive Offices.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- i. Unsolicited visits are prohibited.
 - ii. All appointments on JHS Premises must be made by the Contractor Representative, in advance, regardless of whom the Representative would like to visit.
 - iii. Access is limited to the office or conference room they have been authorized to visit.
 - iv. No lingering or socializing in any JHS administrative offices will be permitted.
3. Contractor and CCP Parking
- a. Jackson Memorial Medical Center Campus
 - i. Logistics Lot
 - (1) Contractor parking in this area must be approved by Project Manager and Public Safety and will be based upon availability.
 - (2) Contractor will be issued a JHS “hang-tag” to display in vehicle.
 - (3) Parking availability is not guaranteed.
 - (4) Only one (1) hangtag will be issued per contracted company for this area.
 - (5) Hangtag will be valid for length of contractor’s engagement.
 - (6) There is no fee incurred to park in this area.
 - ii. Parking Garages
 - (1) Contractors may purchase a monthly parking account based upon approval by Project Manager and Public Safety.
 - (2) Contractor is eligible to hold this account for length of the project and will incur the cost of the prevailing “contractor rate” for that account.
 - (3) Contractor may also elect to purchase daily parking at any garage.
 - (4) Contractors are not allowed to park in Lot 5/Blue Lot (adjacent to Rehabilitation and Diagnostic Treatment Center (DTC) buildings) at any time.
 - (5) Construction workers are not permitted to park in any JHS garages or lots.
 - iii. Contractors are strongly encouraged to minimize the number of vehicles on campus by creating a car/van pool process and transporting employees to work site.
 - b. Jackson North Medical Center, Jackson South Medical Center, Jackson West Medical Center, and Satellite Facilities
 - i. Location of contractor parking at these locations will be determined by Project Manager and Public Safety.
4. Regulatory On-Boarding Requirements for Contractor Personnel
- a. Contractor Personnel, including CCP, shall comply with the strict on-boarding requirements for contracted personnel per JHS Policy No. 368 - JHS Contractor / Agency Staff Requirements as outlined below:
 - i. The Public Health Trust (PHT/Trust), as a mandate of The Joint Commission, as well as other regulatory agencies, requires Contractor Personnel and Construction Contractor Personnel to maintain the following documents in their personnel files for presentation upon request.
 - (1) Physical exam and general health screen statement indicating the person is free of communicable disease and fit to perform the assigned job duties.
 - (2) Negative Urine Drug Test: 5 Panel Drug Screen submitted to a Trust approved drug testing facility.
 - (3) Criminal Background Screening
 - (4) JHS Mandatory New Hire Orientation
 - (5) Compliance with JHS Administrative Policy No. 368
 - ii. Prior to assigning personnel to perform contracted services for the Trust, Contractor Personnel and Construction Contractor Personnel, at its own



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

expense, shall carefully screen personnel in accordance with the Trust's pre-employment health screening policies and procedures. The requirements shall include, but shall not be limited to:

- (1) Pre-placement health screening.
- (2) Background and employee compliance.

- iii. Throughout the term of each respective Contractor Personnel Agreement, Contractor Personnel and Construction Contractor Personnel shall ensure that the Trust's policies for contractor/agency requirements are met.

5. Vendor Registration

- a. In addition to the foregoing, all Contractor Personnel and CCP are required on an annual basis to register with the PHT's Procurement Management Department by completing a Vendor Registration Application prior to receiving or renewing a contract award.
- b. Detailed instructions may be obtained by accessing the Department's Vendor Portal website at <https://jhsmiami.org/VendorPortal/Display.cfm>.
- c. Registration is required.

G. Contractor Personnel and CCP who Engage In Sales or Marketing Activities

1. If, at any time, Contractor Personnel or CCP also engage in sales or marketing activities performed by a Vendor Representative as described in Section III.B.1. above, then the individual shall be treated as a Vendor Representative under this Policy with all of the corresponding I.D. badge and Lobbyist Registration requirements as needed.

H. Work Performed by Contractor Personnel and CCP In Patient Care Areas

1. If any work is to be performed in a patient care area, the Unit Supervisor for that area is responsible for ensuring that patient privacy is protected to the fullest extent possible for the duration of the work performed.
2. Representatives of the Procurement Management Department and/or the Public Safety Department may request and confiscate a contractor's badge for any act(s) of non-compliance with this policy and the requirements communicated via Reprax platform.

I. Visitors

1. Patient Related

- a. Visitors wishing to visit a patient on an in-patient unit must obtain a Temporary I.D. from a designated visitor management station.
 - i. This I.D. will display the Visitor's photo, name, date, time of entry and destination.
- b. The Visitor is limited to the patient care area that is designated on the Temporary I.D. and may also access public areas such as the cafeteria and gift shops.
- c. Visitors shall display the Temporary I.D. in a visible location above the waist at all times while on JHS Premises.
- d. All Visitors are encouraged to respect established patient visiting hours as set forth in JHS Policy No. 169 – Visiting Hospitalized Patients and/or Policy JHS No. 169A – Covid-19 Visitation Guidelines, as applicable.

2. Non-Patient Related

- a. Visitors wishing to visit any person in a JHS Premises that is not a patient must obtain a Temporary I.D. from a designated visitor management station.
 - i. The Visitor is limited to the destination designated on his or her I.D. and public areas.
- b. All such visits must be by appointment and must take place in an area that respects patient privacy such as an administrative office or conference room.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- c. Government officials and persons accompanied by identified Jackson Memorial Foundation (JMF) employees or agents, including prospective JMF donors, must have a Temporary I.D., but may access the JHS Premises without a scheduled appointment provided that:
 - i. Their visit is coordinated with the Executive Office
 - ii. They are accompanied by a JHS Employee.
 - d. Visitors shall display the Temporary I.D. in a visible location above the waist at all times while on JHS Premises.
 - 3. External Regulatory Agency Representatives
 - a. Representatives from external regulatory agencies may access JHS Premises without an appointment provided that:
 - i. They wear their agency ID Badge in a visible location at eye level
 - ii. They report to the Executive Office immediately upon their arrival.
 - b. State and Federal surveyors do not have to be accompanied by a JHS Employee in order to access JHS Premises.
 - 4. Visitors who Engage in Sales or Marketing Activities
 - a. Visitors who also engage in sales or marketing activities performed by a Vendor Representative as described in Section III.B.1., above, shall be treated as a Vendor Representative under this Policy with all of the corresponding Identification/Badge requirements and Lobbyist Registration requirements.
- J. Procedures and Limitations Governing Vendor Representatives and Contractor Personnel
 - 1. Pharmaceutical Non-Formulary Items and Formulary Changes
 - a. Vendor Representatives/Contractor Personnel are not allowed to discuss non-formulary items with JHS Medical Staff Members under any circumstances.
 - i. If a JHS Medical Staff Member asks a Vendor Representative/Contractor Personnel about non-formulary items or indications outside approved criteria, the Vendor Representative/ Contractor Personnel is not permitted to respond and must refer the JHS Medical Staff Member to the Department of Pharmacy Services.
 - b. Vendor Representatives/Contractor Personnel are only permitted to promote formulary items limited to and in accordance with the restrictions and/or guidelines approved by the PHT Pharmacy and Therapeutics (P&T) Committee.
 - i. Discussions with JHS Medical Staff Members concerning formulary items must be limited strictly to the JHS approved guidelines and criteria for use of the item.
 - ii. Vendor Representatives/Contractor Personnel should contact the JHS Department of Pharmacy for this and related information.
 - c. JHS is responsible for notification to medical and nursing personnel of changes to the Formulary (additions, deletions, restrictions, etc.) as approved by the P&T.
 - i. JHS is responsible for all communication of policies and procedures regarding the availability, status, and usage of pharmaceutical products and medical supplies to the hospital staff, including JHS Medical Staff Members and nursing staff.
 - ii. Vendor Representatives/Contractor Personnel shall make no statements to members of the medical and nursing staff regarding such policies and procedures.
 - iii. As necessary, inquiries and comments are to be directed to the Department of Pharmacy Services for clarification and/or action.
 - d. Promotional activities which are not consistent with P&T Committee policies and procedures regarding review, restrictions, and drug utilization criteria are prohibited and considered a violation of these rules.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

2. Supplies, Medical Surgical Products and Devices
 - a. All supplies, medical surgical products and devices must be approved by the PHT Value Analysis Committee/Value Analysis Team (VAT) before being introduced to any JHS facility. The VAT group is managed by the Division of Strategic Sourcing and Supply Chain Management.
 - b. Vendor Representatives/Contractor Personnel are not allowed to discuss new or non-contracted items with JHS Medical Staff Members under any circumstances.
 - i. If a JHS Medical Staff Member asks a Vendor Representative/Contractor Personnel about new or non-contracted items, the Vendor Representative/Contractor Personnel should refer the JHS Medical Staff Member to the PHT VAT.
 - c. Vendor Representatives/Contractor Personnel are only permitted to promote products limited to and in accordance with the restrictions and/or guidelines approved by the PHT VAT and should contact the JHS Value Analysis Team for this and related information.
 - d. JHS is responsible for notifying medical and nursing personnel of changes to list of products approved by the VAT (additions, deletions, restrictions, etc.).
 - i. JHS is responsible for all communication of policies and procedures regarding the availability, status, and usage of products and medical supplies to the hospital staff, including JHS Medical Staff Members and nursing staff.
 - e. Vendor Representatives/Contractor Personnel shall make no statements to members of the medical and nursing staff regarding such policies and procedures.
 - i. As necessary, inquiries and comments are to be directed to the JHS Value Analysis Team for clarification and/or action.
 - f. Promotional activities which are not consistent with PHT VAT policies and procedures are prohibited and considered a violation of this Policy.
3. Pharmaceutical Samples
 - a. Outside of Jackson Medical Group (JMG) medical offices, sample drugs are not permitted in JHS Premises.
 - i. Sample drugs may not be used or issued to patients by any JHS Medical Staff Member, JHS Employee, Vendor Representative or Contractor Personnel, unless permitted otherwise pursuant to JHS Physician Services Policy No. 004 – Sample Medications Management.
 - b. Vendor Representatives/Contractor Personnel are strictly prohibited from providing sample drugs in all JHS Premises, unless permitted otherwise pursuant to JHS Physician Services Policy No. 004 – Sample Medications Management.
 - i. All JHS Medical Staff Members and JHS Employees are prohibited from soliciting and/or accepting sample drugs for their personal use from Vendor Representatives/Contractor Personnel.
4. Vendor Supported Educational Programs Provided on JHS Premises
 - a. All training or educational programs must be pre-approved for content, in writing, by the Chief of Service/designee and the Pharmacy Department or VAT and must not exceed the scope of the content approved.
 - i. Copies of lecture content shall be provided to the Supply Chain or Pharmacy Departments at least one month prior to the program date.
 - b. Any current JHS restrictions or guidelines for use must be included in the content of the program.
 - i. Provision of medical education regarding pharmaceuticals is limited to medical personnel (i.e. M.D., Pharm.D., R.N., etc.) and cannot be provided by Vendor Representatives or Contractor Personnel that do not have a degree in medical sciences.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- ii. Programs must not be scheduled in any patient care area or unit, including inpatient units, nursing stations, patient care unit conference rooms, physician lounges or outpatient clinics without prior written approval by the respective department and Value Analysis.
 - 5. Operating Room Access
 - a. Vendor Representatives or Contractor Personnel who will be entering the operating room in the role of technology subject matter experts must be familiar with and observe the requirements for JHS Vendor Procedures in the Perioperative Setting set forth in Perioperative Services Departmental Policy No. 192 – Perioperative Service Vendor Policy.
- K. Criteria for Delivery & Use of General Supplies, Medical Supplies and Medical Equipment
 - 1. All supply deliveries to the main JHS Premises will be done by delivering through the Supply Chain receiving area, located at 1100 N.W. 20 Street, Miami, Florida, 33136.
 - 2. Emergency deliveries must be coordinated through the Supply Chain Management Department and the Division of Public Safety.
 - a. Any exceptions to this procedure must be approved by the Division of Public Safety.
 - 3. Deliveries to the JHS clinics, Urgent Care Centers, satellites, Jackson North Medical Center, Jackson South Medical Center and Jackson West Medical Center shall continue to be delivered directly to those locations.
 - 4. Equipment deliveries that require technical set-up in or around a patient care area, once received by the Receiving Area, may be delivered by the Vendor Representative to the specified area of the hospital by appointment and with the approval and accompaniment of the Unit Supervisor.
 - 5. All new, loaner, rented, or trial evaluation medical supplies must be approved to be brought in by Value Analysis and Nursing Education.
 - 6. Equipment must be inspected and approved by the Biomedical Department prior to being used for patient care in a JHS facility.
 - 7. Training must be provided to staff on all shifts prior to any new technology or equipment being introduced in a JHS facility.
 - a. Vendor Representatives may only present training content that has been previously discussed and approved by the appropriate department.
 - b. The department receiving the equipment is responsible for properly documenting that all training has been provided.
- L. Sanctions
 - 1. Violations or non-enforcement of any of the requirements of this Policy by JHS Employees may result in disciplinary action up to and including termination.
 - 2. Violations or non-enforcement of any of the requirements of this Policy by JHS Medical Staff Members may result in disciplinary action in accordance with the PHT Medical Staff Bylaws.
 - 3. Violations or non-enforcement of any of the requirements of this Policy by University of Miami (UM) employees working on a JHS Premises may result in disciplinary action in accordance with University of Miami personnel procedures, and may also result in the suspension or removal by JHS of the UM employee's privileges to work on JHS Premises.
 - 4. Violations by Vendor Representatives or Contractor Personnel of the requirements of this Policy may result in sanctions against either the individual, and/or the company (vendor or contractor) for whom the individual works.
 - a. These may include the suspension of individual visitation privileges to all JHS Premises, a request that the company replace the individual, or the suspension of visitation privileges for the entire company.



Section: 100 – 200 Administration

Subject: Vendor/Contractor/Visitor Access & Activity

- b. **Violations of this Policy by a Vendor Representative or Contractor Personnel may also result in vendor/contractor suspension or debarment under the PHT Procurement Regulation and/or the termination of existing JHS contracts.**

IV. References

Section 2-11.1(s), of Miami-Dade County's Conflict of Interest Code of Ethics Ordinance

JHS Perioperative Services Policy No. 130 – Attire in Surgical and Procedural Areas

JHS Perioperative Services Policy No. 192 – Perioperative Service Vendor Policy
 JHS Physician Services Policy No. 004 – Sample Medications Management

JHS Policy No. 169 – Visiting Hospitalized Patients and/or JHS Policy No. 169A – Covid-19 Visitation Guidelines, as applicable

JHS Policy No. 327 – Photo ID Badge/Card and Electronic Access Policy

JHS Policy No. 368 - JHS Contractor / Agency Staff Requirements

Responsible Party: Vice President Strategic Sourcing

Reviewing Committee(s): JHS Policy and Procedure Committee

Authorization: President and CEO, Jackson Health System

V. Attachments

**Division of Public Safety
 Photo ID Services**

Tel: (305) 585-6631 • Fax: (305) 585-5729

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Page 12 of 13
