



## POLICY &amp; PROCEDURE MANUAL

SECTION: 100 – 200 ADMINISTRATION

SUBJECT: VENDOR/CONTRACTOR/VISITOR  
ACCESS & ACTIVITY POLICY**I. DECLARATION OF INTENT AND SCOPE:****A. Purpose**

The purpose of this Policy is to regulate the presence and movement of Vendor Representatives, 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, maintain patient safety and the standard of care.

**B. Scope**

This Policy applies to all Vendor Representatives, Contractor Personnel and Visitors while on JHS Premises as defined herein. Patients are not considered Visitors and are not covered by this Policy.

**C. Implementation**

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. The Division of Public Safety is authorized to deny access to JHS Premises to Vendor Representatives, Contractor Personnel and Visitors who fail to comply with any requirement of this Policy.

**II. POLICY:****A. 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:

1. 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



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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 and other Sales Representatives, regardless of whether they presently hold contracts with JHS.

2. Contractor Personnel – Contractor Personnel is any person working on JHS Premises pursuant to an existing contract with Jackson Health System limited to the products and services presently included under that contract. 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, construction workers and company personnel assigned to work at JHS under outsourcing contracts. Contractor Personnel must adhere to the Identification/Badge requirements set forth in Section II.C. of this Policy. Contractor Personnel must obtain and display a Permanent Badge titled “Contractor” that expires annually.
3. 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 II.D. of this Policy
4. 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 & Florida International University clinicians and community based physicians.
5. 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.
6. Permanent Badge – This is the hard, plastic badge issued by the JHS Division of Public Safety/Photo ID Services to qualifying Contractor Personnel under this Policy. This badge expires on Jan 14<sup>th</sup> 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.



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7. Temporary I.D. – This is the paper badge issued on a daily basis by the JHS Division of Public Safety 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.
8. JHS Premises – For the purposes of this Policy, JHS Premises includes the following buildings: all in-patient buildings that are part of Jackson Memorial Hospital, Holtz Children’s Hospital, Jackson Mental Health Hospital Center, Jackson Memorial Rehabilitation Center, Ryder Trauma Center, Jackson North Medical Center, and Jackson South Community Hospital. In addition, any property owned or utilized by JHS including JHS property leased to vendors or retail establishments (e.g. AuBonPain) 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 in writing.
9. Reptrax – 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.

**B. Vendor Representatives**

1. Lobbyist Registration and Vendor 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).

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.

The principal and any employee whose normal scope of employment includes lobbying activities is a lobbyist, pursuant to the ordinance.



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Please visit the Miami Dade County Clerk of the Board website for additional information and forms:

<http://www.miamidade.gov/cob/lobbying-guidelines.asp>.

- b. In addition to the foregoing, all vendors/manufacturers are required on an annual basis to register with the Trust's Procurement Management Department by completing a Business Registration Application prior to receiving a contract award. Detailed instructions may be obtained by accessing the Department's website at [www.jhsmiami.org](http://www.jhsmiami.org). Registration and regular entry into Reprax is required.
2. Vendor Representative Access/Appointments:
- a. Vendor Representatives must have a scheduled appointment to visit JHS Premises; unsolicited visits are prohibited. All appointments on JHS Premises must be made by the Vendor Representative, in advance, regardless of whom the Representative would like to visit.
  - b. 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. Vendor Representatives must conduct meetings **ONLY** in offices or non-clinical conference rooms affording privacy. Vendor Representatives are barred completely from the Intensive Care Units (ICU). One exception, subject to case-to-case approval by Jackson, 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. Access is limited to the office or conference room they have been authorized to visit. No lingering or socializing in any hospital hallway will be permitted. Meetings shall not be permitted in JHS public areas such as cafeterias, hallways, telephone areas, elevators and parking garages, nor in inpatient care units.
  - c. Due to patient confidentiality concerns, Vendor Representatives are not permitted to attend any conferences or reports at which protected health information is shared. Vendor Representatives may not see patients, review their charts or any portion of the patient medical record, whether in electronic or paper format, go on rounds or attend surgery. Vendor Representatives are prohibited from all clinical areas and conference



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rooms on inpatient units where there may be potential for patient health information to be shared.

### 3. Identification/Badge Requirements:

Effective January 15, 2014 JHS implemented the Reprax vendor credentialing community. All vendors who wish to gain access to our facilities are required to register by visiting [www.Reprax.com](http://www.Reprax.com).

- a. Vendor Representatives, who visit JHS Premises, may do so via registration in Reprax and will not obtain a Permanent Badge. They will be issued a sticker badge.
- b. 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.
  - i. Once the Vendor Representative has submitted the required “JHS Vendor Representative Application Form”, completed the Reprax requirements and information as outlined above, if approved the vendor representative will be able to print a vendor sticker badge that must be worn. This process signifies completion of the JHS Vendor Representative requirements and must be followed and sticker badge worn by the Vendor Representative in a visible location above the waist at all times he/she is on JHS Premises. They will need to log in to Reprax every visit and exit.

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.

### C. 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. For purposes of this Policy, all agency personnel, including



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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 II.C.1.(a), who intend to work on a JHS Premises for five business days or less during a 12 month period must check in at a designated visitor management station where they will be issued a Temporary I.D. by the JHS Division of Public Safety. The Temporary I.D. will include his/her photo, name, date, time of entry, destination, and a date of expiration. Contractor Personnel 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 II.C.1.(a) who intend to work on a JHS Premises for more than 20 business days during a 12 month period, or who have in fact worked on a JHS Premises for more than 20 business days during a 12 month period, shall obtain a Permanent Badge issued by the JHS Division of Public Safety/Photo ID Services. The badge will state the sponsoring JHS Department and will include an expiration date. 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, Procurement Management Department. The Procurement Department may authorize persons at JNMC or JSCH to receive/process applications and scan/send such applications to the Central Procurement Department for Director, Procurement Management Department approval.

The Permanent Badge is the property of JHS. Contractor Personnel shall display the Permanent Badge in a visible location above the waist at all times while on JHS Premises. All contractor badges will expire on Jan 14<sup>th</sup> of each year regardless of the date of issuance, or at the date of the expected work period end, whichever is earlier. Upon the expiration or termination of their contract, Contractor Personnel must return their Permanent Badge to the JHS Division of Public Safety. The sponsoring JHS department is responsible for enforcing this provision and all the vendor credentialing requirements. If the Permanent Badge is lost, the Contractor Personnel 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 Access/Appointments:





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- a. Contractor Personnel Access is limited to areas directly related to the work being performed at JHS facilities. Contractor Personnel access to restricted or secured areas will need to be coordinated through the Project Manager, Public Safety and User Department. JHS keys shall not be assigned to Contractor personnel at any time.

Contractors 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. Upon completion of the project, construction keyways must be removed and replaced with JHS approved hardware and keyways (if applicable).

- b. Contractor Personnel 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. No lingering or socializing in any hospital hallway will be permitted. Meetings shall not be permitted in JHS public areas such as cafeterias, hallways, telephone areas, elevators and parking garages, nor in inpatient care units.
- c. Contractor Personnel must have a scheduled appointment to visit JHS Administrative and Executive Offices; unsolicited visits are prohibited. All appointments on JHS Premises must be made by the Contractor Representative, in advance, regardless of whom the Representative would like to visit. Access is limited to the office or conference room they have been authorized to visit. No lingering or socializing in any JHS administrative offices will be permitted.

3. Contractor Parking:

- a. JMH



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- i. Logistics Lot – Contractor parking in this area must be approved by Project Manager and Public Safety and will be based upon availability. Contractor will be issued a JHS “hang-tag” to display in vehicle. Parking availability is not guaranteed. Only one (1) hang-tag will be issued per contracted company for this area. Hang-tag will be valid for length of contractor’s engagement. There is no fee incurred to park in this area.
- ii. Parking Garages – Contractors may purchase a monthly parking account based upon approval by Project Manager and Public Safety. 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. Contractor may also elect to purchase daily parking at any garage. Contractors are not allowed to park in Lot 5/Blue Lot (adjacent to Institute Annex/Rehabilitation and DTC buildings) at any time.

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. JNMC, JSCH and Satellite Facilities

- i. Location of contractor parking at these locations will be determined by Project Manager and Public Safety.

4. Contractor Personnel Who Engage In Sales Or Marketing Activities:

If, at any time, Contractor Personnel also engage in sales or marketing activities performed by a Vendor Representative as described in Section II.B 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.

5. Work Performed By Contractor Personnel In Patient Care Areas:





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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.

Representatives of the Procurement 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.

**D. Visitors****1. Patient Related:**

Visitors wishing to visit a patient on an in-patient unit must obtain a Temporary I.D. from a designated visitor management station. This I.D. will display the Visitor's photo, name, date, time of entry and destination. 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. Visitors shall display the Temporary I.D. in a visible location above the waist at all times while on JHS Premises. All Visitors are encouraged to respect established patient visiting hours as set forth in PHT Policy 169.

**2. Non-Patient Related:**

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. The Visitor is limited to the destination designated on his or her I.D. and public areas. 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. 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 (1) their visit is coordinated with the Executive Office and (2) they are accompanied by a JHS Employee. 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:**



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Representatives from external regulatory agencies may access JHS Premises without an appointment provided that (1) they wear their agency ID Badge in a visible location at eye level and (2) they report to the Executive Office immediately upon their arrival. 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:

Visitors who also engage in sales or marketing activities performed by a Vendor Representative as described in Section II, above, shall be treated as a Vendor Representative under this Policy with all of the corresponding Identification/Badge requirements and Lobbyist Registration requirements.

**E. Procedures and Limitations Governing Vendor Representatives and Contractor Personnel**

1. 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. 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. 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 Committee. 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. Vendor Representatives/Contractor Personnel should contact the JHS Department of Pharmacy for this and related information.
- b. 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. 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. Vendor Representatives/Contractor Personnel shall make no statements to



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members of the medical and nursing staff regarding such policies and procedures. As necessary, inquiries and comments are to be directed to the Department of Pharmacy Services for clarification and/or action.

- c. Promotional activities which are not consistent with P&T Committee policies and procedures regarding review, restrictions, drug utilization criteria are prohibited and considered a violation of these rules.

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. Vendor Representatives/Contractor Personnel are not allowed to discuss new or non-contracted items with JHS Medical Staff Members under any circumstances. If a JHS Medical Staff Member asks a Vendor Representative/Contractor Personnel about new or non-contracted items, the Vendor Representative/ Contractor Personnel is not permitted to respond and must refer the JHS Medical Staff Member to the PHT VAT. 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 Department for this and related information.
- b. JHS is responsible for notifying medical and nursing personnel of changes to list of products approved by the VAT (additions, deletions, restrictions, etc.). 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. Vendor Representatives/Contractor Personnel shall make no statements to members of the medical and nursing staff regarding such policies and procedures. As necessary, inquiries and comments are to be directed to the JHS Value Analysis Department for clarification and/or action.
- c. Promotional activities which are not consistent with PHT VAT policies and procedures are prohibited and considered a violation of this Policy.

3. Pharmaceutical Samples:



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Sample drugs are not permitted in any JHS Premises. Sample drugs may not be used or issued to patients by any JHS Medical Staff Member, JHS Employee, Vendor Representative or Contractor Personnel. Vendor Representatives/Contractor Personnel are strictly prohibited from providing sample drugs in all JHS Premises. 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:

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. Copies of lecture content shall be provided to the Supply Chain or Pharmacy Departments at least one month prior to the program date. Any current JHS restrictions or guidelines for use must be included in the content of the program. 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. 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:

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 249.

#### **F. 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<sup>th</sup> Street. Emergency deliveries must be coordinated through the Supply Chain Management Department and the Division of Public Safety. Any



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exceptions to this procedure must be approved by the Division of Public Safety.

2. Deliveries to the JHS clinics and satellites, Jackson North Medical Center and Jackson South Community Hospital shall continue to be delivered directly to those locations.
3. 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.
4. All new, loaner, rented or trial evaluation medical must be approved to be brought in by Value Analysis and Nursing Education. Equipment must be inspected and approved by the Biomedical Department prior to being used for patient care in a JHS facility.
5. Training must be provided to staff on all shifts prior to any new technology or equipment being introduced in a JHS facility. Vendor Representatives may only present training content that has been previously discussed and approved by the appropriate department. The department receiving the equipment is responsible for properly documenting that all training has been provided.

**G. 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 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.



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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. 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. **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.**

**APPROVED:** Rosa Costanzo, VP, Strategic Sourcing & Supply Chain  
Management and Chief Procurement Officer

Isa Nunez, VP, Facilities Design & Construction

Mark Aprigliano, Corporate Director, Public Safety

**AUTHORIZATION:**

Carlos A. Migoya, President and CEO, Jackson Health System

