



**LOS ANGELES COUNTY DEPARTMENT OF HEALTH SERVICES
HARBOR-UCLA MEDICAL CENTER**

SUBJECT: VENDOR CONTROL

POLICY NO. 460

CATEGORY: Administration	EFFECTIVE DATE: 7/86
POLICY CONTACT: Francisco Rea	UPDATE/REVISION DATE:
REVIEWED BY COMMITTEE(S):	

PURPOSE:

The purpose of this policy is to establish guidelines for vendor representative access to the patient care environment and/or patient health information and to ensure compliance with Harbor-UCLA Medical Center (Harbor-UCLA), Department of Health Service (DHS) policies and procedures, state and federal rules and regulations, and accreditation requirements. The DHS-designated vendor credentialing system will be the official system of record for maintaining and retaining documentation for vendor companies and their vendor representatives in all categories.

This policy only applies to VRs as defined in this policy. It does **NOT** apply to County employees, non-County workforce members (contractors reporting to Harbor-UCLA staff), remote access visitors, security personnel, patient visitors, affiliates, residents, interns, temporary or registry workforce, students, volunteers, observers/shadows, research/study monitors, remote access vendors, security personnel, first responders, clergy, celebrity visitors, nonpatient care area delivery staff, auditors, or regulatory personnel.

DEFINITIONS:


Vendor Representative (VR) – (a) an individual who visits Harbor-UCLA for the purpose of selling or promoting goods or service; (b) a technician, trainer, installer, and other vendor personnel intending to come on-site; (c) pharmaceutical, supply, equipment and other sales representatives, IT or other sales or service providers, regardless of whether an agreement is in place (e.g., benefits salespeople); (d) individuals who have an agreement with the County to promote and sell various insurance products, disability benefits, and other benefits to County Employees; or (e) any vendor contacted to provide service.


The following vendor personnel are not considered “vendor representatives”:

- Delivery personnel who are merely dropping off or picking up materials, etc.
- Vendor personnel who will only work outdoors on the campus grounds, such as landscaping personnel
- Temporary or registry workforce members, research/study monitors, or contractors reporting to DHS staff.

REVISED: 8/89, 2/99, 9/04, 3/05, 5/11, 3/16, 2/22

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Note: A clinician who provides direct patient care at Harbor-UCLA does not qualify as a VR and must go through the sponsorship process to be credentialed and on-boarded by Harbor-UCLA's Human Resources (HR) department.

"Direct patient care" is defined as serving as care provided to the patient, the operation or manipulation of equipment that is in direct contact with a patient, entering the sterile field in the operating room, or touching a patient in the course of a procedure (i.e. cardiac catheterization lab, operating room).

VR categories are defined below and are applied through the vendor credentialing system when the VR registers.

Category A - Patient Care Area Vendor Representative Visitor

VRs in this category require access to patient care areas. Category A VRs who will be present in a direct patient care area must undergo health clearance in accordance with the terms of the Vendor Management Program.

In the event a Category A VR is asked to enter restricted patient care areas, they must be escorted by Harbor-UCLA staff.

Examples of Patient Care Area VR Visitors include: Medical/surgical suppliers, IT suppliers running cabling through patient care areas, persons who must make deliveries specifically to a patient care area.

Category B - Non-Clinical Vendor Representative Visitor

VRs in this category provide medical or non-medical products/services and they are not required to access any patient care areas, do not interact with patients, do not provide direct patient care to patients, do not operate any medical equipment at Harbor-UCLA, and do not have access to patient health information or Protected Health Information (PHI) or Personally Identifiable Information (PII). Category B VRs may enter a patient care area when it is vacant of patients.

Contract/vendor staff that have brief contact with patients and/or employees, manage or handle patient/employee personal belongings (e.g. valets) may require criminal background check and health screening documentation as determined on a case-by-case basis.

Non-clinical sales or supplies/services vendors, (e.g. County approved employee benefits, insurance, and fundraising vendors, etc.) must have an agreement with the County and contact Harbor-UCLA HR, as applicable, or building management for approval to access the facility. They are only allowed in a public area to sell their product and are not allowed in a patient care area, nor allowed to sell to the public.

Any on-site or remote VR requiring access to the Harbor-UCLA and/or DHS network/electronic medical records or vendors who obtain an electronic access pass, must be sponsored through the DHS HR credentialing and on-boarding process, unless exempted by contractual agreement. Harbor-UCLA may elect to onboard VRs who provide direct or indirect patient care and have a continuous presence in the facility.

Examples of Non-Clinical VR Visitors include: Office supply vendors, business services vendors, nonclinical consultants, building maintenance/construction personnel not entering patient care areas, mail/package delivery, water delivery, and medical product vendors meeting in a conference room outside of a non-patient care area, such as a conference room.



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POLICY:

To conduct business at Harbor-UCLA, VRs must have authorized access and register with the vendor credentialing system designated by DHS and used by Harbor-UCLA. The VR must register and pay the appropriate fee specified and submit all applicable documentation as required into the vendor credentialing system. VRs must follow all applicable Harbor-UCLA and DHS policies and procedures while visiting the facility.

Vendor personnel staff that require access to confidential patient information are required to undergo a criminal background check conducted by the vendor/agency. This requirement pertains to non-County computer systems design, software, and repair persons if they must access confidential or patient information, unless exempted by contractual agreement.

Unless specifically authorized (appointment or invitation), and with staff escort, VRs are prohibited from entering patient care and other restricted areas at Harbor-UCLA, including the Emergency Department, the Operating Room and, patient care units, outpatient clinics, waiting rooms, pharmacy dispensing areas, and the Supply Chain Operations (SCO) storerooms or warehouses.

Harbor-UCLA staff (staff escort, sponsor, etc.) are required to monitor the VR and ensure the VR adheres to all facility, unit, and departmental guidelines and procedures, state and federal laws and regulations that protect the use and disclosure of PHI or PII, The Joint Commission (TJC), and Centers for Medicare and Medicaid (CMS) Services.

Harbor-UCLA staff are not authorized to approve expenditures, authorize purchases, and/or sign contracts that obligate the County's financial resources without written authority to do so in accordance with signatory provisions in DHS Policy 801 "Authority to Approve Expenditures".

A patient has the right to refuse the presence of a VR during a procedure. The patient's right to privacy should be respected.

PROCEDURE:

A. Vendor Credentialing

All VRs will be required to join the vendor credentialing service. Only VRs screened through the vendor credentialing service and who have completed Harbor-UCLA and DHS requirements will have authorized access to the facility. Any VR who is delinquent or missing credentials will not be allowed a badge or access to the facility.

Vendor credentialing and access must follow requirements in the matrix below:



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Vendor Credentialing Requirements		Cat A	Cat B
Administration	Appointment Required for Each Visit	x	x
	Registration with Vendor Credentialing Company	x	x
	Badge Photo and Profile Information	x	x
	Successful Completion of Background Check	x	
	Successful Completion of Sanction Screening Check - State and Federal	x	
	W-9	x	x
	Proof of Vendor Liability Insurance	x	x
Health Screening	COVID-19 Vaccination	x	x
	Influenza Vaccination	x	
	Mumps-Measles-Rubella (MMR) Vaccination/Titer	x	
	Varicella Vaccination/Titer	x	
	Tuberculosis Test Results (Chest x-ray may be required)	x	
	Tetanus-Diphtheria-Acellular-Pertussis (Tdap) Vaccination or Declination	x	
	Hepatitis B Vaccination/Titer or Declination (Required if possible, blood/bodily fluid exposure risk is present)	x	
Training Credentials	DHS HIPAA Training, Attestation and Quiz	x	
	Harbor-UCLA Vendor Access Policy Acknowledgement	x	x
	Harbor-UCLA Vendor Orientation Acknowledgment	x	x
	Competency Verification Attestation Letter from Vendor Management	x	

B. Facility Access

1. All VRs must have a scheduled appointment to access Harbor-UCLA, as obtained through HR, Supply Chain Operations (SCO), Facilities/Building Management, or service requestor, etc.
2. All VRs must enter the hospital at the designated vendor entrance -- the security checkpoint by the Outpatient Pharmacy entrance – and undergo weapon screening, appointment verification, and identification screening.
3. Except in special circumstances, VRs will not be allowed in the facility after business hours.
4. All VRs must check in at one of Harbor-UCLA’s vendor credentialing stations. If the vendor credentialing station is not operational, then VR must contact and check in with Harbor-UCLA SCO.
5. The VR will receive a temporary vendor identification badge from the vendor credentialing station after successful check-in. This temporary badge and the company badge containing photo identification must be worn at all times while inside a facility. The vendor identification badge is only good for one day use; a “VOID” will appear when expired.



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6. The VR must check out at the vendor credentialing station at the end of his/her visit and then destroy the temporary vendor identification badge obtained from the vendor credentialing kiosk.
7. The VR may use common areas of the facility; however, initiating unsolicited contact with clinicians, employees, or patients is prohibited and may result in the suspension of visitation privileges.
8. Professional attire is required. VRs are not allowed to wear personal scrubs or lab coats when visiting Harbor-UCLA. If scrubs are necessary for procedures, the facility will issue appropriate scrubs and shoe covers and any other required protective equipment.
9. Failure to comply with these procedures shall result in the loss of VR privileges and exclude the VR from further transactions with Harbor-UCLA or any other DHS facility. Length and duration of privilege loss will be determined on a case-by-case basis.
10. Harbor-UCLA reserves the right to limit the number of VRs per company, duration of visits, and areas, and access doors utilized by the VR.

C. Vendor Relationships

1. All vendors must be registered with the Los Angeles County Internal Services Department (ISD) prior to a VR engaging in any promotional or informational activities at Harbor-UCLA. Vendors may be referred to the following website for self-registration <http://camisvr.co.la.ca.us/webven>.
2. All VRs must be registered with GHX.
3. DHS SCO must approve all evaluation, trial, loan, lease, rental, consignment, no-charge equipment, or products prior to bringing any equipment or products into Harbor-UCLA.
4. No product samples or order pads shall be left by VRs in any area of a Harbor without prior approval of DHS SCO or DHS Pharmacy.
5. Vendors will only be paid for product use if prior approval has been documented within DHS SCO or DHS Pharmacy, a GHX requisition has been approved, and a Purchase Order has been provided.
6. Vendors should work with DHS SCO to market or discuss non-standardized products, not directly with physicians or staff. Violations may result in suspension of the VR from access to the facility.
7. Vendor and Harbor-UCLA's workforce members must comply with the DHS conflict of interest guidelines.

D. Enforcement of Facility Policy

DHS and Harbor-UCLA policies and procedures are to be strictly followed. Any violation may affect the entire vendor's representation at Harbor-UCLA and other DHS facilities/operations. All Harbor-UCLA staff are required to assist in monitoring compliance and must report violations (e.g. failure to wear proper identification, inappropriate entry/access to patient care areas, etc.), to DHS SCO or the DHS Compliance Hotline at (800) 711-5366.



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Activities that fail to comply with this policy will be handled on a case-by-case basis.

NOTE: The representative of record is responsible for any violation of policies by any representative from his/her company. Corrective actions will be documented in the vendor's file in DHS SCO.

ATTACHMENTS/FORM(S):

Definitions for Patient Care Areas

AUTHORITY/REFERENCES:

DHS Policies

DHS Conflict of Interest Policies and Procedures

801 Authority to Approve Expenditures

822 Relations with Suppliers

DHS Code of Conduct

Joint Commission

Leadership Standards LD.04.01.05, LD.04.03.09, LD.04.04.05

Human Resources Standards HR.01.02.01, HR.01.02.05, HR.01.06.01



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Title of Policy: Vendor Representative Access Policy **Revision Date:** 04/01/2019
Definitions for Patient Care Areas –

Patient Care Areas	Non-Patient Care Areas
Inpatient/Outpatient Rooms	Cafeteria
Exam Rooms	Meeting/Conference Rooms Without Patients*
Patient Advocate Office	Office Spaces Without Patients*
Outpatient Pharmacy	Offsite Buildings Without Patients*
Patient Transport	Parking Lots
Phlebotomy	Breakrooms
EVS Working Patient Care Area	Meditation Rooms
Patient Rooms	Restrooms
Patient Waiting Rooms	Laboratory Processing
Nursing Stations	Volunteer Office
Treatment Rooms	Administration
Laboratory - Where Patients are Present	Library Without Patients*
PFS, Cashier, Central Supply	Warehouse
Operating Room/Recovery Room (Restricted Area – Permission Required)	Maintenance Areas Without Patients*
Labor and Delivery/Nursery (Restricted Area – Permission Required)	Orchid/Cerner Mission Control
ICU, NICU, PICU, CCU (Restricted Area – Permission Required)	Sheriff Office
Step-Down (Restricted Area – Permission Required)	Call Center
Psychiatric Units (Restricted Area – Permission Required)	Hallways
Emergency Departments (Restricted Area – Permission Required)	Supply Chain Office
G.I. or Cath Lab (Restricted Area – Permission Required)	Wellness Center
Pharmacy (Restricted Area – Permission Required)	Gift Shop
Pediatrics (Restricted Area – Permission Required)	Coffee Shop
Burn Unit (Restricted Area – Permission Required)	Walking by Patient Waiting Areas
Sterile Processing (Restricted Area – Permission Required)	EVS Office
Radiology/MRI/Ultrasound (Restricted Area – Permission Required)	Dietary Food Prep
	Inpatient Pharmacy (Restricted Area – Permission Required)

* Category B VRs Must Mask When Patients Are Present