

**OLIVE VIEW-UCLA MEDICAL CENTER  
PHARMACY  
POLICY & PROCEDURE**

**NUMBER: 1355**

**VERSION: 1**

**SUBJECT/TITLE:** 203 - PHARMACEUTICAL SALES REPRESENTATIVES

**POLICY:** All pharmaceutical sales representatives (PSRs), including all vendor personnel or their agents, are subject to the following rules and regulations upon visiting or contacting any department at Olive View-UCLA Medical Center (OVMC).

**PURPOSE:** To establish guidelines governing the activities of pharmaceutical sales representatives visiting Olive View-UCLA Medical Center.

**DEPARTMENTS:** PHARMACY

**DEFINITIONS:** Pharmaceutical Sales Representatives include any employee of a pharmaceutical/manufacturing firm who maintains any form of contact with healthcare professionals for the purpose of directly or indirectly promoting or discussing their firm's proprietary products. These include, but are not limited to, pharmaceuticals, pharmaceutical devices, cosmetic agents and nutritional products.

**PROCEDURE:** District managers, company supervisors, or the equivalent are responsible to ensure that each one of their PSRs comply with the following rules and regulations.

**A. Sanctions /Non-Compliance**

- Failure to observe all provisions of these rules and regulations will prompt officials to immediately escort the PSR off county premises, issue a letter of complaint to the PSR's manager(s) and temporarily or permanently suspend the PSR's visiting privileges. OVMC Pharmacy Administration has the right to exercise any of these corrective actions in any order they wish within reasonable means after the violation. Continuation of such activities may result in revocation of visiting privileges for the vendor and may impact an existing or future contractual agreements. Revocation of privileges at OVMC may be applied to other DHS sites or across the health system. Revocation of privileges for one vendor may result in similar sanctions for vendors sharing ownership or involved in joint ventures.
- Failure of vendors or PSRs to follow FDA regulations, DHS, or facility

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utilization guidelines regarding pharmaceutical products may also lead to a loss of privileges.

**B. Registration**

- Prior to any visit, District Managers or their equivalent shall ensure that all PSRs directly register at the onsite Pharmacy Administration Office at each visit. All vendors/PSRs or affiliated personnel are required to register, even for a one-time visit.
- Each registrant must provide the following:
  - Name, business address and both business and after-hours telephone number.
  - Name, business address and telephone number of immediate supervisor or District Managers.
- The number of PSRs per vendor with visit privileges may be limited. The number of vendors with shared ownership or cross-licensing agreements that will be allowed to promote the same products may be limited.

**C. Activity Standards: Sign-in, Sign-out, and Identification**

- PSRs may only visit the facility if an appointment has been arranged with a provider in advance, with a specific date/time for this appointment.
- Upon entry into the facility, security officers shall direct the PSR to the pharmacy administration office to register and sign-in.
- The vendor must providing the following in writing:
  - The names of the healthcare providers with whom the PSR has appointments
  - The nature of the visit
  - The name of the product(s) that will be promoted or discussed
- Upon sign-in, designated pharmacy personnel will ensure that PSR has read facility policy and signed attestation form. Pharmacy personnel will also validate that PSR has pre-arranged appointment with a healthcare provider.
- Once confirmed, designated pharmacy personnel will issue a facility-specific special badge to the PSR. The PSR must wear this special badge and his/her company identification badges at all times while at the facility.
  - Any OVMC staff member who encounter a PSR without a special badge will direct the PSR to the Pharmacy

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Administration Office to register and sign-in.

- The PSR must sign-out at the onsite pharmacy administration office before leaving the premises. The special badge must be returned at this time. Use of special badge outside of appointed time may be grounds for disciplinary action as detailed in the Sanctions/Non-Compliance section.

#### **D. Areas Prohibited**

- Authorization to be present in an area is granted 15 minutes prior to and after the scheduled appointment time.
- PSRs are prohibited from entering physician, nurse practitioner, pharmacist, or other provider offices, corridors, and waiting rooms without an appointment. Mail rooms, copier rooms, libraries, employee or physician lounges are off limits to PSRs at all times.
- The PSR is prohibited from attending any physician or healthcare provider conference/meeting where patient specific information and/or treatment plans are discussed.
- The PSR is also barred from visiting patient care areas, which include but is not limited to, the intensive care unit, emergency room, cardiac catheterization lab, and operating room.

#### **E. Appointments**

- PSRs may only visit a DHS healthcare provider after pre-arranging an appointment. This means the provider has reserved a specific date and time to see the PSR. A request for literature or material should not be considered a reason to drop in without a scheduled appointment.
- PSRs may not solicit or provide pharmaceutically-sponsored events, such as snacks, meals, dinner talks and trade expositions during their visits.
- PSR registration area will maintain a list of physicians and other providers who have asked that PSRs not attempt to contact them, either by telephone, mail or otherwise.

#### **F. Educational or Promotional Information**

- Detailing or promotion of any non-DHS Core Formulary drugs is prohibited. PSR may only discuss medications currently on DHS Core Formulary.
- No detailing in any group setting shall occur of non-formulary

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products. Moreover, detailing which opposes DHS guidelines or restrictions are strictly prohibited. Detailing is defined as the transfer of medical or general information about product(s) by the PSR or agent speaking in behalf of or funded by the PSR to physicians or other healthcare personnel in an institution-sponsored educational activity. This includes the citing of journal studies, side effects, superiority over competitors' products, or general product information, for the purpose of promoting sales.

- Any sample brochure or document issued to the provider must also be provided to the Pharmacy Department.
- Any information that is to be presented as an in-service must be pre-approved by Olive View Pharmacy and Therapeutics Committee.

**G. Posting of Material**

- The posting of any kind of direct-to consumer or “educational” material referencing a specific non-formulary product(s) with the name of the pharmaceutical company by either the pharmaceutical representative or county employee on any county premises is strictly prohibited.

**H. Price Information**

- PSRs shall not quote or provide any pricing information to healthcare providers. Providers shall be directed to the onsite pharmacy administration office for specific Los Angeles County pricing information.

**I. Drug Samples**

- Drug samples are strictly prohibited. Drug samples shall NOT be stored, delivered, or distributed

**J. Incentives**

- Incentives such as drug vouchers, coupons, and/or related items are strictly prohibited.

**K. Reporting**

- County employees/contractors may report any suspected violations as related to this policy to a local facility P&T member or facility Pharmacy Director.

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References:	
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Review Date: 1/18/2017	Revision Date:
Distribution: Inpatient Pharmacy, Medicine	
Original Date: 03/08/2017	