



COUNTY OF LOS ANGELES DEPARTMENT OF HEALTH SERVICES

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Policy & Procedure Title:	Vendor Representative Access Policy		
Category:	800-899 Equipment, Services, Supplies	Policy No.:	822.001
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DHS Division/Unit of Origin:	Supply Chain Operations		
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Distribution: DHS-wide	<input checked="" type="checkbox"/>	If not DHS-wide, other distribution:	

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 the Department of Health Services (DHS) policies and procedures, state and federal rules and regulations, and accreditation requirements. The established vendor credentialing system will be the official system of record for maintaining and retaining documentation for vendors in all categories.

DEFINITION:

Vendor Representative (VR) – (a) an individual who visits a DHS facility for the purpose of selling or promoting goods or services to DHS employees; (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 a service..

Note: A clinician who provides direct patient care in a DHS facility does not qualify as a VR and must go through the sponsorship process to be credentialed and on-boarded by DHS Human Resources (HR).

Direct Patient Care is defined as serving as a care provider 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. cath lab, operating room).

The mission of the Los Angeles County Department of Health Services is to ensure access to high-quality, patient-centered, cost-effective health care to Los Angeles County residents through direct services at DHS facilities and through collaboration with community and university partners.

Revision/Review Dates: 06/01/2011 01/15/2014 04/01/2019
Department Head/Designee Approval:

SCOPE:

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 DHS staff), remote access visitors, security personnel, patient visitors, affiliates, residents, interns, temporary or registry workforce, students, volunteers, observers/shadowers, research/study monitors, remote access vendors, security personnel, first responders, clergy, celebrity visitors, non-patient care area delivery staff, auditors, or regulatory personnel.

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

Category A - Patient Care Area Visitor

VRs in this category require access to patient care areas.

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

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

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.

Category B - Non-Clinical 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 DHS medical facilities, 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 vacant of patients.

Examples of Non-Clinical VRs include: office supply vendors, business services vendors, non-clinical 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.

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 facility 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 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. DHS facilities may want to consider onboarding VRs who provide direct or indirect patient care and have a continuous presence in the facility.

POLICY:

VRs must have authorized access and register through the vendor credentialing system, utilized by DHS, to conduct business in a DHS facility. The VR must register and pay the appropriate fee specified and submit all applicable documentation as required into the vendor credentialing system.

All VRs must have prior written permission or an appointment to access DHS facilities.

VRs must follow all DHS and facility policies and procedures while visiting a DHS facility.

Unless specifically authorized (appointment or invitation), and with staff escort, VRs are prohibited from entering patient care and other restricted areas within the facility including the: Emergency Department, Operation Rooms, patient care units, outpatient clinics, waiting rooms, pharmacy dispensing areas, and the supply chain operations storerooms or warehouses.

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

DHS facility 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.

DHS facility 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.

Vendor 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.

PROCEDURE:

A. Vendor Credentialing

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

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	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	
	DHS Vendor Access Policy Acknowledgement	x	x
	DHS Vendor Orientation Acknowledgment	x	x
	Competency Verification Attestation Letter From Vendor Management	x	

B. Vendor Credentialing Service

Facilities utilizing a vendor credentialing service: All VRs will be required to join the vendor credentialing service. Only VRs screened through the vendor credentialing service and who have completed DHS requirements will have authorized access to the facility. Any Category A VR who is delinquent or missing credentials will not be allowed a badge or access to the facility. Other category VRs will be restricted in the number of accesses to the facility.

C. Facility Access

1. All VRs must have a scheduled appointment to access a DHS facility, as obtained through HR, Supply Chain Operations (SCO), Facilities/Building Management, or service requestor, etc.

2. Except in special circumstances, vendors will not be allowed in the facility after business hours.
3. In medical facilities, all VRs must check in at the vendor credentialing kiosk. If the vendor credentialing kiosk is not available, then vendor must check in at the facility security desk or with SCO.
4. The VR will receive a temporary badge or identification sticker from the kiosk after checking-in. The temporary badge or identification sticker and the company badge containing photo identification must be worn at all times while inside a DHS facility. It is only good for one day use; a "VOID" will appear when expired.
5. The VR must check-out at the vendor credentialing kiosk at the end of his/her visit and then destroy the temporary badge obtained from the vendor credentialing kiosk.
6. 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.
7. Professional attire is required. VRs are not allowed to wear personal scrubs or lab coats when visiting a DHS facility. If scrubs are necessary for procedures, the facility will issue appropriate scrubs and shoe covers and any other required protective equipment.
8. Failure to comply with these procedures shall result in the loss of VR privileges and exclude the VR from further transactions with any DHS facility. Length and duration of privilege loss will be determined on a case-by-case basis.
9. Each DHS facility reserves the right to limit the number of VRs per company, duration of visits, and areas, and access doors utilized by the VR.

E. Vendor Relationships

1. All vendors must be registered with the Los Angeles County Internal Services Department (ISD) prior to a VR engaging in any promotion or information activities in any DHS facility. 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. SCO must approve all evaluation, trial, loan, lease, rental, consignment, no-charge equipment or products prior to bringing any equipment or products into a DHS facility.
4. No product samples or order pads shall be left by VRs in any area of a DHS facility without prior approval of DHS SCO or Pharmacy.

5. Vendors will only be paid for product use if prior approval has been documented within DHS SCO or Pharmacy, a GHX requisition has been approved, and a Purchase Order has been provided.
6. Vendors should work with 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 DHS workforce members must comply with DHS and facility conflict of interest guidelines.

G. Enforcement of Facility Policy

DHS and facility policies and procedures are to be strictly followed. Any violation may affect the entire vendor’s representation at DHS. All DHS 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.

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

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	