




Vendor Access

May 2021 Monthly Education

Title: Vendor Access	Policy Number: OP.025.0
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Source: SerenaGroup™ Inc.	Revisions:
	Medical Director SerenaGroup, Inc. Thomas E. Serena MD FACS

INTRODUCTION:

Vendors that conduct business at or with the Advanced Wound Care Center will do so in accordance with Hospital and SerenaGroup policy guidelines. Physicians, nurse practitioners, students, and staff that work within the Advanced Wound Care Center will interact with vendors in a manner that meets ethical standards, protects patient confidentiality, does not interfere with the process of patient care, and encourages the appropriate, efficient, and cost-effective use of equipment, supplies, and pharmaceuticals within the Advanced Wound Care Center. It is the responsibility of all staff to monitor and assure that vendors are compliant with these guidelines.

POLICY:

To establish regulations for vendors doing business at the Advanced Wound Care Center.

To provide guidelines for physicians, nurse practitioners and staff when interacting with vendors.

To assure appropriate identification of all vendors visiting the Advanced Wound Care Center.

To minimize interruption of patient care and staff productivity.

To improve the security of our patients, staff, and property.

To ensure that all vendor contacts are consistent with the Advanced Wound Care Center patient care, academic, and research missions.

To specify a mechanism to enforce this policy

DEFINITIONS:

Vendor - any representative of a manufacturer or company who visits the Advanced Wound Care Center for the purpose of soliciting, marketing, or distributing information regarding the use of medications, products, equipment, and services. Specified portions of the policy do not apply to vendors whose non-pharmaceutical products are already in place in the institution when the purpose of the visit is specifically to provide information to the Advanced Wound Care Center personnel concerning the implementation and appropriate use of their non-pharmaceutical product.

Hospital and Health Center Sites - the buildings used by Advanced Wound Care Centers for inpatient or outpatient care.

POLICY STANDARDS

Physicians, nurse practitioners and staff are expected to uphold the highest ethical standards in interactions with all vendors. Each member of the Advanced Wound Care Center is responsible for reporting violations of this policy to the Program Director of the Advanced Wound Care Center.

PROCEDURE STANDARDS

General

- Any vendor visiting Wound Care Centers, at any site owned or managed by a SerenaGroup, will be required to register in and out of the facility via the program established to track vendors at their respective organizations and adhere to all its requirements. Administrative discretion, regarding the applicability of the System, should be used for small sites with minimal Vendor visits.
- Vendors must have an appointment before coming to the Advanced Wound Care Center. Vendors must contact the Program Director to schedule an appointment during normal business hours. Vendors are not permitted in the Advanced Wound Care Center without an appointment or the consent of the Program Director.
- Vendors who show up at departments without checking in at the front desk without valid identification will be asked to either leave the facility or return to the designated area to check in and receive proper identification.
- If a vendor does not adhere to this policy, the Advanced Wound Care Center will take action as appropriate, such as requesting a replacement vendor or limiting new business with the Advanced Wound Care Center.
- All vendors entering the Advanced Wound Care Center will be given this written policy and will be available at the front desk of each center.
- The Advanced Wound Care Center reserves the right to limit the number of vendors that any single company has visiting the center.
- Vendors visiting the Advanced Wound Care Center for the sole purpose of initiating and monitoring IRB-approved research studies are exempt from this policy on those occasions only.

Pre-Visit

- Upon a vendor's first visit to the Advanced Wound Care Center, they shall schedule an appointment with the Program Director/Materials Management/Supply Chain Department who oversees Vendor Compliance.
- All vendors must schedule an appointment prior to being allowed to visit with the Program Director.

Access

- Vendors are restricted in access to physicians' offices, department offices, conference rooms (invitation only) and public areas.



- Under most circumstances, vendors are prohibited from entering patient care areas within the Advanced Wound Care Centers. An exception to this is a situation in which a vendor is required for training on new equipment or devices already purchased by the Advanced Wound Care Center, setting up such equipment, or similar activities associated with a contractually agreed-to business purpose associated with new technology or devices. These cases must be approved by the Program Director.
- Vendors are prohibited from attending any conference where patient-specific information or quality assurance activities are being discussed.
- Vendors are not to place information out at any Advanced Wound Care Center unless specifically requested by the Program Director.

Food and Beverages

- Food or drink may not be provided directly by vendors.
- Vendors may provide an educational grant to a department and the department is responsible for educational program, content and speaker. The department may decide to use some of the educational grant funds to provide lunch to the attendees.
- Off-site dinner programs are permitted following Hospital regulations.

Promotional Activities

- Cash or other incentive programs are strictly prohibited at the Advanced Wound Care Center.
- No personal gifts of any kind from vendors to physicians, nurse practitioners or staff are permitted.
- Vendors are not permitted to distribute, post, or leave any type of printed or handwritten material, advertisements, signs, or other such promotional materials anywhere in the Advanced Wound Care Centers. Unsolicited materials may not be provided to clinicians; any promotional or informational material provided by a vendor must be explicitly requested by faculty or staff.
- Distribution of vendor patient educational material that may be useful to our patients should be left with the Program Director. Vendors are strictly prohibited from providing educational material of any type directly to patients or from leaving them in areas accessible to patients.
- Only pricing/cost information which has been approved by the hospital partner Entity's Materials Management/Supply Chain Department may be discussed with clinicians. **Absolutely, no contracts may be presented to clinical staff; all contracts must be routed through the appropriate department.**
- Raffles, lotteries, or contests that provide the winner with gifts of any value are not permitted.
- Pre-printed prescription pads may not be distributed.

Samples

- The use of samples is not permitted in the Advanced Wound Care Center. Industry representatives who wish to trial their product should contact Dr. Thomas Serena to arrange for an IRB approved clinical case series or trial.

Product Approval Process

- The Vendor's product must be approved by the partner hospital. Please contact the partner hospital entity's Materials Management/Supply Chain Department to verify.
- If it is not approved, the vendor must work with the department directly to get approval with the hospital partner in order for the product to be used within the Advanced Wound Care Center.

Grants/Gifts

- No personal gifts of any kind from vendors to faculty or staff are permitted.
- Vendor representatives may not give to individuals or the Advanced Wound Care Center any promotional gifts (such as pens, pads, etc.) featuring product names. All gifts to the Institution must be consistent with hospital partner's policies concerning conflicts of interest.

Confidentiality

- Vendors shall NOT attend programs in which specific patients are discussed or when quality assurance or risk management issues are presented.

Responsibility

- All Advanced Wound Care Centers and staff are responsible for assuring that vendors interacting with our center comply with this policy. Non-compliant vendors are to be immediately reported to the Program Director.
- Security may, at any time, request to inspect a vendor's identification badge. Vendors without proper identification badges will be escorted to the appropriate vendor check-in area. Uncooperative vendors or those in violation of hospital policies may be escorted off the premises.



Hospital System

- Hospitals Vendor Access Policy
 - SerenaGroup, as a hospital partner, defers to their vendor access policy when available
 - Have your Program Director pull the policy for you if you do not have access to it.
- Many Hospital Systems have implemented policy changes surrounding vendor access and gifts.
 - However, even with the evidence that vendor presence has a profound impact on prescription rates, very few Hospitals have barred vendors completely.
- SerenaGroup works closely with their Hospital partners to limit unnecessary vendor interactions.



What is a Vendor?

Vendor- any representative of a manufacturer or company who visits the Advanced Wound Care Center for the purpose of soliciting, marketing, or distributing information regarding the use of medications, products, equipment, and services. Specified portions of the policy do not apply to vendors whose non-pharmaceutical products are already in place in the institution when the purpose of the visit is specifically to provide information to the Advanced Wound Care Center personnel concerning the implementation and appropriate use of their non-pharmaceutical product.



Vendor Sales Techniques

- Cold calls
- Physician or Office introductions/recommendations
- Event sponsoring (have taken a limited role as of 2020)
- ***Detailing: small gifts to Physicians or staff, often in the form of food costing less than \$20.***
- Education: being well-versed in the product and able to answer detailed questions and provide demonstrations to staff and Physicians.



Preventative Measures

“The Physician Payments Sunshine Act (PPSA)--also known as [section 6002 of the Affordable Care Act](#) (ACA) of 2010--requires medical product manufacturers to disclose to the Centers for Medicare and Medicaid Services (CMS) any payments or other transfers of value made to physicians or teaching hospitals. It also requires certain manufacturers and group purchasing organizations (GPOs) to disclose any physician ownership or investment interests held in those companies.”



Sunshine Act

- The legislation was intended to increase the transparency of financial relationships between Physicians, Medical Organizations and companies who produce pharmaceuticals, durable medical equipment and biologics.
- Annual reporting of how much monetary value was received by the Physician in the form of meals, gifts, speaking fees, travel, entertainment, education etc.
 - Payments to a Physician or their staff are considered income to the Physician and are required to be reported on the Physicians' income tax.



MYTH

“Meals or gifts don’t increase the use of a product.”

FACT: Detailing or providing small gifts to Physicians or their staff is the most prominent form of marketing. Companies spend more on detailing than on researching and developing new products. 95% of drug companies’ payments to Physicians are in the form of meals costing less than \$20. These payments have shown to increase prescription rates by 18-70% depending on the specialty.



Free meals are “paying off”!



MYTH

“Vendors have always been a neutral source for factual information.”

FACT: Vendors may be intentionally or unintentionally biased.

- **Example:** *In 1998, Vioxx pain killer was found to increase the risk of heart attack and stroke by five times. Sales reps (vendors) were instructed to deflect questions regarding ill effects. At the time this drug company spent more on marketing the drug than Nike, Pepsi and Budweiser combined.*



Changes due to COVID-19

- Due to COVID-19 restrictions, many Hospitals and Medical Offices have limited unnecessary visitors, including vendors
- Virtual communication has become increasingly important (e-mail, phone, video conference etc.)
- Reasonable Exceptions:
 - Assistance with new product utilization
 - Pickup/return or assistance with expired product
 - Assisting with benefits verification

Check with your Hospital COVID-19 access policy before permitting vendors into the clinic



A Necessary Relationship

- While there are some risks associated with vendors accessing the Wound Center, it is important to get to know your local product representative and establish a working relationship with them
- When used appropriately, product vendors can be a valuable resource to your clinic and patients



Know the Difference!

Benefits

- Education for new product use/application
- Continuing Provider education and Nursing competency
- Up to date on legislation and/or billing changes
- Assist with benefits verification process
- Clarification of patient out of pocket expenses

Risks

- Potential for withheld or biased information
- Effective sales techniques
- Negative financial outcomes if products are not used appropriately
- Negative clinical outcomes if products are not used appropriately



QUIZ TIME

SG

QUESTION 1:



1. Each member of the Advanced Wound Care Center is responsible for reporting violations of the policy to the Program Director of the Advanced Wound Care Center.

Answer: **TRUE**. This is why it is extremely important for you to have full understanding of the Vendor Access Policy.



QUESTION 2:



2. Vendors are allowed into the Advanced Wound Care Center by pre-visit only.

Answer: **TRUE**. Per policy, all vendors must schedule an appointment prior to being allowed to visit with the Program Director, Clinical Coordinator, Provider.



QUESTION 3:



3. Vendors are restricted in access to physicians' offices, department offices, conference rooms (invitation only), and public areas.

Answer: **TRUE.**



QUESTION 4:



4. There are no risks associated with having vendors in our clinics.

- Answer: **FALSE**. The risks associated with having vendors in the Advanced Wound Care Center are: Withheld or biased information, Effective sales techniques leading to unnecessary use or overutilization of product, Negative financial outcomes, Negative clinical outcomes



QUESTION 4:



4. There should be no professional relationship with product vendors

- Answer: **FALSE**. When used appropriately, vendors are a valuable resource. It is important to develop a working relationship with local vendors



Thank you for taking the time to complete SerenaGroup Education for May 2021. SerenaGroup continues to focus on providing education to all clinical staff. If you have ideas, questions, comments around education – please reach out to the Education Committee Members.

SerenaGroup Education Committee Members,

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