

Vanderbilt **Pharmaceutical Services** VENDOR POLICY MANUAL

Revised Date: August 2010

- **This Policy Manual applies to visitation to any Vanderbilt owned facility by a vendor. Included in this list is:**
 - Vanderbilt University Medical Center
 - Vanderbilt University Hospital
 - Vanderbilt Children's Hospital
 - Vanderbilt – Stallworth Rehabilitation Hospital
 - Vanderbilt Psychiatric Hospital
 - Vanderbilt Medical Group (VMG) Clinics
 - Vanderbilt One Hundred Oaks Clinics (VMG)
 - Vanderbilt ASAP Clinic
 - Vanderbilt University
 - School of Nursing
 - School of Medicine
 - Vanderbilt Student Health

REGISTRATION PROCESS

- The following vendors are registered through the Department of Pharmacy before visiting any Vanderbilt facility:
 - Pharmaceutical Representatives
 - Nutraceutical Representatives
 - Pharmacy Benefit Manager Representatives
 - Home Health Representatives (if the company operates an on-site pharmacy)
 - Any other representative involved in medication therapies (research, etc)
- Researchers involved in a study being conducted at Vanderbilt do not have to pay a vendor fee

(All medical equipment and device representatives must register through the Department of Purchasing, Vendor Liaison Office at 615.343.5434- http://www.vanderbilt.edu/procurement/procurement/liaison_registration.shtml

- An annual registration fee of \$150 is charged prior to the issuance of the vendor badge. This fee is used to strictly cover operational costs incurred by Vanderbilt University Medical Center due to the impact on the Hospital due to Health Care Industry representatives conducting business with faculty/staff. Vanderbilt is required to manage all vendors in regards to the hospital's formulary, HIPPA restrictions, general security for our staff and patients, and other regulatory requirements.
- The Vanderbilt Medical Center HIPPA Confidentiality Statement is signed (when completing your Electronic Market Plan) prior to the issuance of your badge.

- For vendors that promote both pharmaceuticals and devices, these vendors register with both the Department of Pharmacy and the Department of Purchasing. Only 1 vendor fee will be paid to the Department of Purchasing.

ELECTRONIC MARKET PLANS (EMP)

- At the time of registration, an Electronic Market Plan (EMP) is completed listing all products that are detailed by the representative as well as pertinent demographic information. A badge cannot be issued nor may a representative visit a Vanderbilt facility until their Electronic Market Plan is submitted and their badge has been issued.
- The EMP is utilized to schedule each visit to a Vanderbilt facility (Plan a Visit tab). The Department of Pharmacy monitors this for compliance.
- The EMP is maintained and accurate at all times as updated by the representative including all detailed products and demographical/company information. All products listed in the EMP are reviewed by a P&T Committee member. If there is an issue with any product listed on a market plan, the representative will be contacted directly by a member of the P&T Committee for discussion. Otherwise, all medications may be promoted according to the guidelines spelled out in this manual.
- Representatives may only detail/promote medications that are listed on their Electronic Market Plan.

IDENTIFICATION BADGES

- ID badges are current and worn above the waist when on Vanderbilt university property
- Badges are issued annually and are renewed by the vendor one year after the date of issuance. Badge issuance is managed by the VUMC Badge Office located in Medical Center North.
- Replacement of a lost/stolen badge is managed by the Vanderbilt Badge Office. Replacement fee is \$15
- Badges are non-transferable between representatives and/or companies
- All Guests obtain a guest badge from the Pharmacy Administration Office in (basement of Vanderbilt University Hospital) or the front desk of an off-site clinic. A Guest Badge is obtained at the beginning of the visit and returned at the end of the visit. Guest badges expire daily unless approved by Pharmacy staff for a longer period of time. Guests remain with their host when visiting with a Guest Badge.
- Vendor badges may be revoked, temporarily or permanently, at the discretion of the Department of Pharmacy if a representative is involved in any infraction of this Vendor Policy Manual or the Medical Center Conflict of Interest Policy

INVITATIONS TO MEETINGS (DINNER PROGRAMS, EDUCATIONAL MTGS, ETC):

- Communication to faculty/staff regarding any program that does not offer CME is not allowed, regardless of the location or means of communication.
- Meetings that are pre-planned (set time/place) at any Vanderbilt facility in which the representative will be presenting information to faculty/staff is to be pre-approved by Michael O'Neal via e-mail.

VISITING VANDERBILT / INTERACTION WITH VUMC PERSONNEL

REGISTRATION OF VISITS

- Each visit to any Vanderbilt facility is pre-registered through the Electronic Marketing Plan (EMP). This can be accomplished up to two weeks in advance. Access to this process is located at the ‘**PLAN A VISIT**’ tab within the EMP.
- Unanticipated visits are registered by leaving a message on the Vendor Phone at 343-3699.

VISITATION GUIDELINES

- Visitation is prohibited by vendors in the following areas of the Medical Center:
 - Inpatient areas
 - Vanderbilt University academic areas (School of Nursing/ Medicine/ Graduate/ Undergraduate)
- Visitation to these areas is requested via e-mail through Michael O’Neal. Visits are initiated and hosted by VUMC faculty/staff on behalf of the vendor
- Preceptorships, defined as time spent with faculty/staff in a teaching or information sharing capacity, are prohibited within all inpatient and outpatient patient-care areas
- All visitations to procedural areas (e.g., Cath Lab/O.R. Radiology. Etc) are pre-approved via e-mail request to Michael O’Neal. Additional training and documentation may be required by the area being visited such as vaccination records, additional HIPPA training, etc. The vendor ensures they have met all the pre-requisites prior to entering a procedural area as dictated by that area’s management. If assistance is needed with this process, contact the Pharmacy Administration Office.
- All VMG (Vanderbilt Medical Group) Clinics (on-site and off-site) require vendor sign-in upon arrival to the clinic. Each clinic possesses the right to schedule appointments according to their own policies and may deny entrance at their discretion.
- When conducting business in a patient waiting area, respect is given to disruption. Cell Phone use is permitted in public corridors and gathering areas.

COMMUNICATION:

- The Vanderbilt e-mail system is not used for communication regarding events (of any kind), promotions, or any other company sponsored activity

VANDERBILT DRUG SAMPLE PROGRAM

GENERAL INFORMATION

- Contact Lisa Smith at the Medical Center East Pharmacy (information a top)
- All samples distributed at any Vanderbilt facility are to be listed on the vendor’s Electronic Market Plan
- Controlled substance samples are not allowed to be distributed at any Vanderbilt facility
- A signature by a Vanderbilt practitioner is required before prescription samples may be distributed at a Vanderbilt facility
- All samples left within a clinic (pre-approved clinics only) must be listed on the “Vendor Log-in Form” at the front desk of the clinic
- Vouchers/Coupons/Financial Aid information is left in all off-site clinics with the staff and at the VMG Clinic Pharmacy and One Hundred Oaks Pharmacy for clinics in those respective facilities. Vouchers/Coupons are not to be distributed in any on-site clinic or One Hundred Oaks Clinic.

SAMPLING AT OFF-SITE CLINICS:

- Samples are delivered directly to an off-site clinic (with the exception of One Hundred Oaks Clinics). The 'Vendor Log-In' sheet is to be filled out at the front desk including a listing of all samples delivered to the clinic.

SAMPLING AT ON-SITE CLINICS:

- The following are considered on-site clinic locations:
 - The Vanderbilt Clinic
 - Medical Center East (North & South Tower)
 - Medical Center North
 - Medical Arts Building
 - Doctor's Office Tower (Children's Outpatient Clinic)
 - Village at Vanderbilt
 - One Hundred Oaks
- All other clinics are considered off-site – samples may be left with any off-site clinic at the discretion of the clinic staff
- All samples intended for use in our on-site clinics must be delivered or mailed to one of our three outpatient pharmacies for distribution to our patients (upon receipt of a sample prescription for our providers). The only exceptions to this are specific drugs that have been approved by the VMG Clinic Pharmacy for the following locations:
 - Eskind Diabetes Center
 - Hillsboro Medical Group
 - Vanderbilt Internal Medicine
 - Vanderbilt Urology (adult)
- No samples are to be distributed in any way (in person, by mail, etc) to a practitioner in their clinic, private office, or any other on-site location within Vanderbilt University Medical Center for any reason.
- Each medication sampled on-site at Vanderbilt will have one contact listed in the MCE Outpatient Pharmacy for communication purposes. It does not matter, once a request has been placed by the pharmacy, which representative delivers the samples. Changes to the 'contact' are made via email to the Sample Program Manager. Any changes to sample availability are emailed to the Sample Program Manager.
- All replacements for samples for on-site clinics are requested via e-mail by the Sample Program Manager to the listed contact.
- **New Samples:** If a product is not currently sampled on-site and the representative wished for it to be, complete and submit the 'New Sample Application' located as a link on this website: <http://www.mc.vanderbilt.edu/pharmacy/vendor/new%20sample%20application.pdf> All instructions are included on the application. The application will be reviewed and the subsequent drug file added to our computer system (generally takes 2-3 days). All new samples are to originate in the MCE Pharmacy regardless of where they will ultimately be stored.