

Policy: Policy: Pharmaceutical Company Representative Activity

Status: Active
Activation Date: 08/04/2010
Last Review Date: 08/04/2010 **By:** Amir Emamifar
Entity: Emory Hospitals
Database: Pharmaceutical Services Policies
Section:

Statement:

It is the policy of Emory Hospitals to authorize, schedule and coordinate pharmaceutical company representative activities as they interact with the Hospitals' medical, pharmacy, nursing and other professional staff members.

Scope/Procedure:

General Information

This policy is necessary for the protection of physician and staff efficiency and integrity and to ensure patient privacy and confidentiality. This policy applies to physicians, medical house staff and students working in the Emory Hospitals. It is acknowledged that pharmaceutical representatives can provide valuable information, however, they are not considered as essential experts or consultants in the care of patients at Emory Hospitals.

Each hospital department director, department medical director and physician is responsible for adherence to this policy as it applies to their respective areas of responsibility. The Director, Pharmaceutical Services is responsible for overall compliance with and enforcement of this policy and procedure.

Appointments/Registration

1. At his/her initial visit, the representative should proceed directly to the Pharmacy Department to receive a copy of the Hospitals' Pharmaceutical Company Representative Activity Policy. The representative will also receive from the Pharmacy Department secretary a copy of the StatusBlue Vendor Compliance Network guide detailing the required registration process.
2. It is a requirement that all vendors successfully register and complete the vendor approval process on www.statusblue.com. This must be completed before the representative will be allowed to enter an Emory Healthcare facility.
3. Representatives must schedule their visits prior to arrival at any hospital location. To schedule an appointment for any reason, a representative contacts a physician or area manager. Representatives are not allowed to use the Hospitals' paging system to make contacts.
4. At each subsequent visit, the representative should register at the Kiosk located centrally in each facility.

5. An Emory Healthcare vendor badge will be issued at the Kiosk after logging into StatusBlue and completing the necessary information regarding the visit. The vendor badge should be prominently worn along with the representative's company name identification badge at all times during the visit. The representative is authorized to visit only the designated area during the appointment. Representatives must obtain a badge from the Kiosk for any visits in the Medical Office Tower (MOT) and for any visits in the Emory Clinic.
6. Hospital staff will not meet with or allow within their areas, representatives lacking a valid Status Blue Kiosk issued Emory Healthcare vendor badge.
7. At their discretion, managers may inform the Pharmacy Department in advance of any scheduled appointment. Information should be sent via e-mail to the EUHM or EUH department secretary or assistant director of pharmacy at Wesley Woods or EUOSH.

Areas of Visitation

1. Representatives are restricted from entering all direct patient care areas and pharmacy storage and work areas.
2. Direct patient care areas include any area where direct patient care occurs such as Patient Rooms, Procedure Rooms (i.e., OR, Cath/EP Lab, Imaging), Patient Observation Rooms, Hospital Nursing Stations, and Emergency Room.
3. Meetings should take place in conference rooms, lounges, offices and other non-direct patient care areas.

Formulary and Drug Promotion

1. The drug information pharmacist will provide the representative with the formulary status of a particular drug. Where applicable, drug guidelines will be shared with the representative.
2. Representatives should support the Hospitals' guidelines for drug use such that detailing does not promote the use outside these approved drug guidelines.
3. For non-formulary drugs, representatives must provide the drug information pharmacist with monograph packets and notification that the drug will be detailed prior to meeting with prescribers. Representatives may be asked to limit detailing of a drug in order to support hospital formulary initiatives.
4. Representatives may provide educational inservices upon request only.
5. Formulary Addition Request forms may not be requested by, completed by, or submitted by a representative. Such forms must be completed and submitted by the physician who makes the request.
6. Because formulary reviews and decisions are based on scientific merit, representatives are not to contact members of the respective Hospitals' Pharmacy and Therapeutics Committee for support.

Drug Samples

Drug samples for patient use are strictly prohibited anywhere within the Emory Healthcare System.

Educational Programs

1. Representatives may provide educational programs upon request for hospital staff. The information presented must be relevant to the role/responsibilities of the staff involved.
2. The programs must be scheduled in advance with the appropriate department director and/or clinical coordinator. Clinical coordinators and representatives will inform the Department of Pharmaceutical Services about educational plans and clinical pharmacists will work in conjunction with representatives and Nursing Clinical Coordinators to ensure that nursing staff receives critical information/training on new drugs or updated regimens.
3. Educational programs should not be scheduled in direct patient care areas and must not interfere with the delivery of patient care.
4. Provision of snacks, drinks or meals is strictly prohibited.
5. Pharmaceutical sales representatives are not considered expert consultants and may not participate in direct patient care or give advice on the care of an individual patient.

Patient Privacy and Confidentiality

1. Rounding with physician teams is strictly prohibited.
2. If observing an invasive procedure, the representative must adhere to the *Emory Hospitals Non-Staff Member Present during Invasive Procedure Policy* which requires the following:
 - Verification of physician and department manager approval
 - Completion of the Non-Staff Member Present During Invasive Procedure Authorization Form
 - Patient consent for observation
 - Obligation for patient privacy and confidentiality
 - Information/instruction on Hospitals Environment of Care Policy
 - Provision of drug information, but not advise on treatment or issue orders on specific patients

> Refer to the *Emory Hospitals policy, Non-Staff Member Present during Invasive Procedure.*

Gratuities

1. Representatives are expected to abide by the American Medical Association's "Guidelines on Drug Industry Gifts" (J.A.M.A. 1991: 265:501) and Pharmaceutical Research and Manufacturers of America's "Code on Interactions with Healthcare Professionals" www.phrma.org/publications/2002
2. No gifts can be accepted by staff, faculty, students or trainees.

Pharmaceutical Company Sponsored Speakers

1. The pharmaceutical company sponsoring a speaker is responsible for informing the speaker of the need to comply with the aforementioned guidelines.
2. The pharmaceutical company sponsoring the speaker will be held responsible for any infraction of a sponsored speaker. Actions for violation of this policy are explained in "Compliance" section.

3. In accordance with current practice standards, all potential conflict of interest and sponsorship are to be stated by the speaker at the beginning of the presentation.
4. The pharmaceutical company will notify the drug information pharmacist, at least one week in advance, of a sponsored speaker.

Compliance

For unethical behavior and violation of this policy, representatives may be temporarily or permanently barred from the hospitals. The representative will be notified of all infractions in addition to being reported to the district manager.

Date of Last Revision: December 2007

Date of Current Revision: August 2010

Related Policies/Procedures:

Key Words for Search:

Regulatory References:

Review/Approval

Comments For Reviewers To Consider:

Reviewers: Janice Glascock, Amir Emamifar

Reviewer Approval	Amir Emamifar	08/04/2010 08:39:00 AM
--------------------------	---------------	------------------------

Approved By:

**Dorothy Williams, M.P.A., R.Ph.
Director, Pharmaceutical Services - Emory Healthcare**

Entered By: Maha M. Safwat 03-Aug-10 at 04:45 PM	Last Edited By: Amir Emamifar 04-Aug-10 at 08:40 AM
--	---