

LEE MEMORIAL HEALTH SYSTEM POLICY & PROCEDURE MANUAL

HEALTHCARE INDUSTRY REPRESENTATIVE VISITATION - ACUTE CARE LOCATIONS		LOCATOR NUMBER																					
T Y P E	<input checked="" type="checkbox"/> System-wide - A formal statement of values, intents (policy), and expectations (procedure) that applies to every employee throughout the System.	CHAPTER: M07																					
	<input type="checkbox"/> Multidisciplinary - A formal statement of values, intents (policy), and expectations (procedure) that applies to more than one discipline and is usually of a clinical nature. Check below all areas to which this applies.	TAB: 02																					
	<input type="checkbox"/> Departmental - A formal statement of values, intents (policy), and expectations (procedure) exclusive to a particular department or group of people within a department at one or multiple locations that does not impact any other area.	POLICY #: 362																					
Disciplines / locations to which this multidisciplinary policy applies:																							
<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Health Information Management</td> <td><input checked="" type="checkbox"/> Pharmacy</td> <td><input checked="" type="checkbox"/> Care Management Department</td> </tr> <tr> <td><input checked="" type="checkbox"/> Housekeeping</td> <td><input checked="" type="checkbox"/> Plant Operations</td> <td><input type="checkbox"/> Ambulatory Services</td> </tr> <tr> <td><input checked="" type="checkbox"/> Information Systems</td> <td><input checked="" type="checkbox"/> Radiology</td> <td><input checked="" type="checkbox"/> Home Health</td> </tr> <tr> <td><input checked="" type="checkbox"/> Laboratory</td> <td><input checked="" type="checkbox"/> Rehabilitation Services</td> <td><input type="checkbox"/> HPCC</td> </tr> <tr> <td><input type="checkbox"/> Legal Services</td> <td><input checked="" type="checkbox"/> Respiratory</td> <td><input type="checkbox"/> Physician Offices</td> </tr> <tr> <td><input checked="" type="checkbox"/> Nutrition</td> <td><input type="checkbox"/> Security</td> <td><input checked="" type="checkbox"/> Compliance</td> </tr> <tr> <td><input checked="" type="checkbox"/> Other <u>Centralized Purchasing</u></td> <td><input checked="" type="checkbox"/> <u>Supply Chain Management</u></td> <td><input checked="" type="checkbox"/> <u>Biomedical Engineering</u></td> </tr> </table>			<input type="checkbox"/> Health Information Management	<input checked="" type="checkbox"/> Pharmacy	<input checked="" type="checkbox"/> Care Management Department	<input checked="" type="checkbox"/> Housekeeping	<input checked="" type="checkbox"/> Plant Operations	<input type="checkbox"/> Ambulatory Services	<input checked="" type="checkbox"/> Information Systems	<input checked="" type="checkbox"/> Radiology	<input checked="" type="checkbox"/> Home Health	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Rehabilitation Services	<input type="checkbox"/> HPCC	<input type="checkbox"/> Legal Services	<input checked="" type="checkbox"/> Respiratory	<input type="checkbox"/> Physician Offices	<input checked="" type="checkbox"/> Nutrition	<input type="checkbox"/> Security	<input checked="" type="checkbox"/> Compliance	<input checked="" type="checkbox"/> Other <u>Centralized Purchasing</u>	<input checked="" type="checkbox"/> <u>Supply Chain Management</u>	<input checked="" type="checkbox"/> <u>Biomedical Engineering</u>
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Date Originated: 5/82	Reviewed/No Revision: 5/06	Dates Revised: 11/85, 3/95, 6/98, 6/00, 7/00, 6/02, 1/03, 3/03, 5/03, 7/04, 10/07, 11/07, 2/09, 6/10, 3/11																					
Author(s): Terry Murphy, Director Supply Chain Management		Next Review Date: 3/13																					
Reviewed by:																							
Clinical Practice Council: N/A		Date: _____																					
Clinical Education Council Yes No:	Education Completed: <input type="checkbox"/>	Date: _____																					
Education Required: <input type="checkbox"/> <input type="checkbox"/> N/A		Date: _____																					
Approved by:																							
Policy Administrator: Mike German, CFO		Date: 3/7/11																					
As Needed:																							
Medical Director:		Date: _____																					
Board of Directors:		Date: _____																					

PURPOSE:

To provide comprehensive guidelines for the visitation of Healthcare Industry Representatives (HCIR), contractors or agencies to various areas throughout Lee Memorial Health System (LMHS) and to afford each patient his/her right to privacy while providing a mechanism for outside agencies

to access patient information to complete their role in the treatment plan and continuity of care. Lee Memorial Health System employees who provide post acute care services under the auspices of the health care system are not considered vendors and sign a confidentiality statement upon hire. **This policy applies to the Acute Care locations and Home Health. Please refer to Ambulatory Services, Lee Physician Group or Health Park Care Center for policy applicable to those locations. This policy shall not apply to HCIR visiting private physicians' offices located in LMHS MOB facilities.**

POLICY:

- A. LMHS is a public institution and employees meeting with potential HCIR are governed by the Florida Code of Ethics for Public Officers and Employees, as well as Corporate Compliance's "Standard of Conduct" as it pertains to HCIR dealings. LMHS is committed to ensuring fair treatment of all potential and competing HCIR.
- B. All HCIR must be registered through our credentialing company Status-Blue by visiting www.status-blue.com and completing required LMHS documentation. HCIR registration process may include but not be limited to:
1. Health Insurance Portability and Accountability Act Confidentiality Agreement ([FM # 0762](#)).
 2. Review of LMHS HCIR Visitation Policies S07 02 362 and M03 05 361.
 3. LMHS Compliance Standards of Conduct.
 4. Verification of company's contracting or agreements relationship with Cooperative Services of Florida (CSF).
 5. Verification of TB screening.
 6. Verification of liability coverage insurance.
 7. Verification of training in:
 - a. OR protocols
 - b. Sterile fields
 - c. Aseptic techniques
 - d. Universal precautions
 8. Verification of Training in LMHS Environment of Care (EOC):
 - a. emergency codes
 - b. fire procedures
 - c. EOC
- C. It is the policy of Lee Memorial Health System to strictly maintain the confidentiality of all patient information, including but not limited to, medical record information and

documentation and to protect each patient's right to privacy. Post acute provider industry representative consist of: home health agencies, DME companies, skilled nursing facilities, assisted living facilities and other agencies that provide care outside of the Lee Memorial Health System. Lee Memorial Health System employees who provide post acute care services under the auspices of the Lee Memorial Health System are not considered vendors and sign a Patient Confidentiality Statement upon hire. Lee Memorial Health System employees who provide post acute care services under the auspices of the health care system adhere to the same referral guidelines. The post acute providers (Home Health Agencies, Nursing Facilities, Rehabilitation Facilities and Residential Facilities) must have a physician's order written on the hospital patient's record and an ICN or telephone referral from a member of the Care Management Department or post acute coordinator before the agency representative will be permitted access to the patient or his/her medical record. An order or other communication made from a physician's office does not constitute a referral. Information will be on a need to know basis. Outside agency staff access is limited to the nursing unit and patient for which they received the referral or have the need to know for review purposes. No marketing visits are permitted to the nursing areas individual staff members or members of the medical staff. All literature, flyers or educational material intended for the CM staff or other employees of the facility staff is to be presented at the CM office in each facility and cannot be distributed on the nursing units by the post acute care representatives. All HCIR will abide by this policy as prescribed by the Health Insurance Portability and Accountability Act by signing a Confidentiality Agreement ([FM # 0762](#)) to that effect.

- D. All departments that register HCIR outside of the Supply Chain Management Status-Blue registration will use the system approved Vendor Guest Register document ([FM# 0791](#)) for processing HCIR into the system. The Vendor Guest Registers are to be retained for one year before disposing or destroying. Complete a Records Destruction form ([FM # 0635](#)) and submit to Legal Services for approval before taking this action.
- E. All HCIR visiting LMHS facilities are required to register at the facilities designated check-in area outlined below in section G. of the procedure. You will be registered using Status-Blue and receive a visitation badge. For security reasons, this badge must be visible at all times during their visit. After normal business hours; HCIR are to check-in and register with Security in the respective facility's ER Security Desk and receive a vendor badge.
- F. It is not our intention to restrict appropriate contact with health system personnel, but rather to ensure that all introductions of products, demonstrations, pricing and/or detailing is coordinated by and with the approval of the respective entity, Cooperative Services of Florida (CSF), LeeSar Centralized Purchasing, Pharmacy, Food & Nutrition or Care Management.
 - 1. Non-employees are prohibited from distributing any communication in print or electronic media or soliciting employees on LMHS premises at any time. This includes, but is not limited to, complimentary newspapers, magazines, catalogues, and product information and non-LMHS brochures unless approved by Press & Public Affairs (reference Policy S09 06 835).
 - a. Publishers and Distributors are not permitted to drop off copies of their publications in the lobbies, waiting rooms or offices of LMHS without prior approval by Public Relations.

2. Pricing should never be provided to anyone other than representatives of our LeeSar Centralized Purchasing Department or contracting arm; Cooperative Services of Florida.
 - a. Any departmental requests for pricing should be communicated back to the appropriate Centralized Purchasing buyer at LeeSar.
 - b. No pricing is to be provided direct to the department but can be appropriately sent to the Buyer or the Cooperative Services of Florida negotiator which will in turn be communicated to the LMHS department.
- G. Centralized Purchasing at the LeeSar Regional Service Center coordinates all purchasing and Cooperative Services of Florida coordinates all contracting for Lee Memorial Health System facilities. HCIR may arrange appointments Monday through Friday from 10:00 a.m. to 4:00 p.m., as appropriate in CSF, LeeSar Centralized Purchasing, Pharmacy, Foods & Nutrition Services, or Care Management.
- H. No HCIR's are allowed in the non-public areas of LMHS without first obtaining approval as appropriate from the Pharmacy, Food and Nutrition, Care Management, Centralized Purchasing, Surgery Services, Information Systems, or Supply Chain Management and only after registering at the appropriate check-in and obtaining a vendor badge.
- I. Any vendor demonstrations or equipment evaluations must have been previously approved for a demonstration/evaluation/trial through our Supply Chain Management Team (SMAT) process with Supply Chain Management who will coordinate this through the LMHS Clinical Resource Manager, appropriate Educators and LeeSar Centralized Purchasing at the LeeSar Regional Service Center.
 1. A no-charge purchase order number will be assigned by Centralized Purchasing for each piece of equipment left for this purpose.
 2. All electrical equipment must be tested by Biomedical Engineering prior to the demonstration.

PROCEDURE:

- A. Department directors / managers requesting vendor representation for any new medical / surgical supply or capital equipment are to complete a New Items Request ([FM # 1246](#)) and contact their buyer in Centralized Purchasing at the LeeSar Regional Service Center or the Supply Chain Management Clinical Resource Manager to facilitate the request.
- B. Centralized Purchasing may authorize the vendor to make direct contact with a department for appointment scheduling purposes. When a post acute provider / agency has a past or current relationship with a patient prior to his / her admission, that agency is to notify the Care Management Department of that relationship for permission to follow the patient while in the facility.
- C. HCIR will park only in the designated Employee Parking Lots and are not to park in Patient or Physician designated parking areas.

- D. HCIR will register with the Supply Chain Management Department at the designated facility location immediately upon entry to any facility and every time they visit the facility with clear direction on the purpose of their visit prior to any department visitation. If visiting multiple facilities in a single day HCIR must register at each facility they enter. After hours and weekends, the HCIR will sign in and out with the Security Department.
1. Those visiting Food and Nutrition, Facility Planning / Plant Operations, and Information Systems, HCIR may proceed directly to those departments; however they must register at those departments.
- E. Post acute provider / outside representative are to check in with the Department of Care Management staff member before visiting the patient or reviewing the medical record.
1. **Third Party Payors:** Company must be the same as what is identified on the face sheet.
 2. **State and Federal Agencies: MUST** present a statement as to the nature of the business and their identification badge.
 3. **Home Health Agencies, Nursing Facilities, Rehabilitation Facilities, and Residential Facilities:** Must have a physician's order and referral from medical social worker, case manager or post acute coordinator.
 4. **Other Agencies:** Permission for the medical review or patient interview will be evaluated on a case-by-case basis.
 5. **Chart review** will be conducted in designated areas of the nursing unit, which varies from unit to unit, under the direction of the Department of Care Management. On weekends or holidays, the agency staff will have the on-call medical social worker paged through the hospital operator for assistance and / or vendor badge. Outside agency staff is not to go behind the nursing station and obtain the medical record for themselves. Any hospital employee retains the right to ask the reviewer for identification and reason for access of the patient information to assure only authorized personnel have access for review.
- F. At no time will an agency representative solicit business, market or complete social visits on the nursing units, with physicians or individual case managers or social workers. All marketing visits and new service calls are to be made to the Director in the Care Management Office.
- G. Any HCIR visiting within an LMHS facility without an LMHS issued visitation badge must be redirected to Supply Chain Management.
- H. Any HCIR requesting to show a product will be required to meet with the appropriate Centralized Purchasing buyer at the LeeSar regional Service Center. The buyer will forward this information to the SMAT for their review. If requested by SMAT, Centralized Purchasing at the LeeSar Regional Service Center will then arrange a meeting between the HCIR and the appropriate SMAT group or department.
- I. Employees of Lee Memorial Health System (LMHS) are subject to both the Florida Code of Ethics for Public Officers and Employees, and LMHS Policy and Procedures governing

solicitation or acceptance of gifts. Items brought in by HCIR that are to be given to the staff as product inducement are prohibited.

- J. The Health Information Management Department delineates post discharge access to the medical record.
- K. HCIR are required to register at the appropriate location below if visiting departments other than those outlined previously in this policy (Section D.1 and E).

Lee Memorial Hospital	Gulf Coast Medical Center	Cape Coral Hospital	HealthPark Medical Center
Supply Chain Management	Supply Chain Management/CS	Central Supply	Central Supply
Medical Office Center, 3 rd Floor	First Floor	First Floor	First Floor
2780 Cleveland Avenue	13681 Doctor's Way	636 Del Prado Boulevard	9981 HealthPark Circle
Fort Myers, FL 33901	Fort Myers, FL 33912	Cape Coral, FL 33990	Fort Myers, FL 33908
(239) 343-2687	(239) 343-1000 ext. 73248	(239) 424-2286	(239) 343-6601

- L. LMHS has a closed formulary for pharmaceuticals. The Pharmacy and Therapeutics Committee must approve new medications. For additional information, HCIR should contact the Director of Pharmacy.
- M. The Food & Nutrition Department, Information Systems, Pharmacy, Facilities Planning, and Care Management are responsible for the selection of their related goods / services. HCIR will be seen by appointment only, which can be made by calling:
 - 1. Food & Nutrition Services (239) 343-0336
 - 2. Information Systems (239) 343-7900
 - 3. Facilities Planning (239) 424-3622
 - 4. Pharmacy (239) 343-2169
 - 5. Care Management (239) 343-2940 LMH
(239) 343-5655 HP
(239) 424-3118 CCH
(239) 343-0624 GCMC
- N. HCIR is required to meet with Cooperative Services of Florida and Centralized Purchasing at the LeeSar Regional Service Center prior to the introduction of any new medical / surgical products or services to the LMHS.
- O. Solicitation or Distribution of Print or Electronic Media

1. Non-employees are prohibited from distributing any communication in print or electronic media or soliciting on LMHS premises at any time. This includes, but is not limited to complimentary newspapers, magazines, catalogues, and product information and non-LMHS brochures unless approved by Press & Public Affairs (Reference Policy S09 06 835).
2. Publishers and Distributors are not permitted to drop off copies of their publications in the lobbies, waiting rooms or offices of LMHS without prior approval by Public Relations.

The Lee Memorial Health System written policies on the behaviors of Healthcare Industry Representatives include the following actions that can be taken against those who violate the policies:

- A. **First Infraction:**
Director of Supply Chain Management or designees will meet with the representative to review incident and possible future actions if infractions continue.
- B. **Second Infraction:**
Suspension of Representatives privileges at all LMHS facilities for a period of up to three months with a formal notification to the representative's supervisor. Current business will be conducted by an alternate representative from the company.
- C. **Third infraction:**
Suspension of the representatives access and privileges at all LMHS facilities indefinitely, with formal notification to representatives supervisor. Suspension will be enforced for a minimum of two years.
- D. **Final Option:**
LMHS may terminate any agreement with companies or HCIR for non-compliance.

Acts of a serious nature will be dealt with in a manner consistent with the LMHS Compliance Standards of Conduct up to and including Final Option.

RELATED POLICIES:

M03 05 361 Healthcare Industry Representative Visitation within Restricted Access / Procedural Areas

S09 01 838 Staff Identification Name Badges

S09 06 835 Solicitation and Distribution in the Workplace

M23 00 768 Responding to Allegations of Inappropriate Marketing Practices by Home Health Agencies

REFERENCES:

Florida Code of Ethics for Public Officers and Employees

LMHS Compliance, "Standard of Conduct"