

**LEE MEMORIAL HEALTH SYSTEM
INTEGRATED SERVICES MANUAL**

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POLICY TYPE: <input checked="" type="checkbox"/> System-wide <input type="checkbox"/> Service Line Specific <input type="checkbox"/> Departmental Date Originated: 5/82 Date Reviewed: 5/98, 6/00 Date Revised: 11/85, 3/95, 6/98, 6/00, 7/00, 6/02, 1/03, 3/03, 5/03, 7/04		TAB: P07 SUB TAB: 02 POLICY #: 076												
Author(s): Terry Murphy														
Approvals: <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-bottom: 1px solid black;">FPO</td> <td style="width: 40%; border-bottom: 1px solid black; text-align: center;">Terry Murphy</td> <td style="width: 30%; border-bottom: 1px solid black; text-align: right;">10/19/04</td> </tr> <tr> <td></td> <td></td> <td style="text-align: right; font-size: small;">Date</td> </tr> <tr> <td style="border-bottom: 1px solid black;">SLC Member</td> <td style="border-bottom: 1px solid black; text-align: center;">John Wiest</td> <td style="border-bottom: 1px solid black; text-align: right;">10/20/04</td> </tr> <tr> <td></td> <td></td> <td style="text-align: right; font-size: small;">Date</td> </tr> </table>			FPO	Terry Murphy	10/19/04			Date	SLC Member	John Wiest	10/20/04			Date
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PURPOSE: To provide comprehensive guidelines for the visitation of vendors, sales representatives, contractors or agencies to various areas throughout Lee Memorial Health System 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. **This policy applies to the Acute Care locations and Home Health. Lee Physician Group and Health Park Care Center apply to a separate policy. This policy shall not apply to vendors visiting private physicians' offices located in LMHS facilities.**

POLICY:

1. LMHS is a public institution and employees meeting with potential vendors 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 vendor dealings. LMHS is committed to ensuring fair treatment of all potential and competing vendors.
2. 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 or vendors consist of: Home Health agencies, DME companies, Skilled Nursing Facilities, Assisted Living Facilities and other agencies who provide care outside of the Lee Memorial Health System. The Post Acute Providers will be permitted access to the patient or his/her medical record after a referral has been made by the Care Management Department or other facility representative based on the physician order and/or plan of care. 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 or the individual staff members. All vendor representatives will abide by this policy as prescribed by the Health Insurance Portability and Accountability Act by signing a Confidentiality Agreement (FM # 0762) to that affect.

3. All departments that register vendors will use the system approved Vendor Guest Register document (FM# 0791) for processing vendors 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.
4. All vendors visiting LMHS facilities are required to register and receive a vendor visitation badge at the facilities designated check-in area outlined below in the procedure. LMHS will retain the vendor's vehicle keys or driver's license while on premises to ensure the return of the vendor visitation badge.
5. For security reasons, this badge must be worn at all times during their visit. It is not our intention to restrict appropriate contact with health system personnel, but rather to ensure that all demonstrations and/or detailing is coordinated by and with the approval of the respective buyer from Pharmacy, Food & Nutrition or Centralized Purchasing. Brochures, catalogs, pricing, etc., are to be presented to the appropriate buyer for introduction to the department.
6. Centralized Purchasing at the LeeSar Regional Service Center coordinates purchasing for all Lee Memorial Health System facilities. Vendors will be interviewed Monday through Friday from 10:00 a.m. to 4:00 p.m., as appropriate in either Pharmacy, Foods & Nutrition Services or Centralized Purchasing. Other hours, including meetings with LMHS personnel, are by appointment only.
7. No vendors are allowed in the non-public areas of LMHS without first obtaining approval as appropriate from the Pharmacy, Food and Nutrition, Centralized Purchasing, Surgery Services, Information Systems or Supply Chain Management and only after obtaining a vendor badge.
8. Any vendor wishing to demonstrate or leave a piece of equipment for evaluation must coordinate this through Centralized Purchasing at the LeeSar Regional Service Center. A non charge purchase order number will be assigned by Centralized Purchasing for each piece of equipment left for this purpose. All electrical equipment must be tested by Biomedical Engineering prior to the demonstration. All equipment purchases will be reviewed/approved by SCAC, as appropriate, and will be evaluated through the appropriate products committee, section/medical staff department, PMT, and/or Technology & Therapeutics Committee.
9. Occasionally there are emergencies and/or times when it is necessary for a vendor to be onsite outside of normal registration hours. In these circumstances, the vendor will notify the appropriate department in advance who in turn will notify Security.
10. Noncompliance to this policy will result in restriction on the vendor from conducting business with LMHS and subject to the following disciplinary actions.

A. First Offense: a written warning to the vendor representative and his/her manager.

- B. Second Offense: Three months suspension for all representatives from the offending company.
 - C. Third Offense: One-year suspension for the individual representative committing the offense.
11. Further disciplinary action may be taken at the discretion of the Directors of Supply Chain Management and Centralized Purchasing with assistance from the Corporate Compliance Officer.

PROCEDURE:

1. Department directors/managers requesting vendor representation for any medical/surgical supply or capital equipment are to contact Centralized Purchasing at the LeeSar Regional Service Center or Supply Chain Management to facilitate the request. The competitive nature of product selection requires department directors/managers give equal opportunity for vendors of similar products during the clinical evaluation process.
2. Centralized Purchasing at the LeeSar Regional Service Center 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.
3. All vendors must register at the facilities designated area prior to visiting any department except for those visiting Pharmacy, Food and Nutrition, Facility Planning / Plant Operations, and Information Systems. Vendors may proceed directly to those departments. The Post Acute Provider/outside representative is to check in with the Department of Care Management staff member before visiting the patient or reviewing the medical record.
 - a. Third Party Payors: Company must be the same as what is identified on the face sheet.
 - b. State and Federal Agencies: **Must** present a statement as to the nature of the business and their identification badge.
 - c. Home Health Agencies, Nursing Facilities, Rehabilitation Facilities, and Residential Facilities: Must have a physician's order or referral from Medical Social Worker, Case Manager or Post Acute Coordinator.
 - d. Other Agencies: Permission for the medical review or patient interview will be evaluated on a case-by-case basis.
4. 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 are 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.

5. Any vendor coming into LMHS without a previously arranged appointment must be directed to Pharmacy, Food & Nutrition or Centralized Purchasing at the LeeSar Regional Service Center. It will then be the responsibility of the respective department's receptionist to call the appropriate buyer or department head/designated employee to determine if the LMHS employee has time to see the vendor. Appointments are strongly encouraged.
6. Vendors desiring to show a product will be asked to leave a brochure, or supporting literature, or other materials and/or a sample, with the appropriate buyer. The buyer will forward this information along with the cost data to the appropriate department for their review. If requested, Centralized Purchasing at the LeeSar Regional Service Center will then arrange a meeting between the sales representative and the requesting department. Items brought in by the vendors that are to be given to the staff (i.e., pizza, sandwiches) as product inducement are prohibited.
7. At no time will a Post Acute Provider/agency representative solicit business, market or complete social visits on the nursing units or Department of Care Management staff.
8. The HIM Department delineates post discharge access to the medical record.
9. Vendors are required to register at the appropriate location below if visiting departments other than those outlined previously in this policy.

<u>Lee Memorial Hospital</u>	<u>Cape Coral Hospital</u>	<u>HealthPark Medical Center</u>
Supply Chain Management	Central Supply Room	Central Supply Room
Medical Office Center, 3 rd Floor	First Floor	First Floor
2776 Cleveland Avenue	636 Del Prado Boulevard	9981 HealthPark Circle
Fort Myers, FL 33901	Cape Coral, FL 33990	Fort Myers, FL 33908
(239) 334-5466	(239) 574-0266	(239) 432-3949

10. LMHS has a closed formulary for pharmaceuticals. The Pharmacy and Therapeutics Committee must approve new medications. For additional information, vendors should contact the Director of Pharmacy.
11. The Food & Nutrition Department, Information Systems, Pharmacy, Facilities Planning and Care Management are responsible for the selection of their related goods/services. Vendors will be seen by appointment only, which can be made by calling:

Food & Nutrition Services	(239) 336-6801
Information Systems	(239) 335-7294
Facilities Planning	(239) 574-0341
Pharmacy	(239) 334-5169
Care Management	(239) 334-5406

12. Vendors are strongly encouraged to meet with Centralized Purchasing at the LeeSar Regional Service Center prior to the introduction of any new medical/surgical products or services to the medical staff.
13. Vendors are required to arrange a post visitation meeting with the respective buyer in Centralized Purchasing at the LeeSar Regional Service Center to review the products presented to each manager/director and any orders placed during the visit. **Any new items must be presented to one of the appropriate system based products committees for review and approval prior to implementation. Those committees are the Surgical Products Committee, Clinical Products Committee and the Neonatal / Pediatric Committee.**