

VENDOR CREDENTIALING POLICY

PURPOSE:

This policy is designed to provide guidance to Vendors with whom Geisinger does business.

PERSONS AFFECTED:

Geisinger Vendors (defined below)
Geisinger Employees

POLICY:

A. Purpose of Policy

This policy is designed to provide guidance to Vendors with whom Geisinger does business.

B. Applicability of Policy to Geisinger

This policy is applicable to all locations within Geisinger, including but not limited to Geisinger Medical Center (GMC); Geisinger Shamokin Area Community Hospital (GSACH), a campus of GMC; Geisinger Wyoming Valley Medical Center (GWV); Geisinger South Wilkes-Barre (GSWB), a campus of GWV; Geisinger Community Medical Center (GCMC); Geisinger Bloomsburg Hospital (GBH); Geisinger Lewistown Hospital (GLH); Geisinger Holy Spirit (GHS); Geisinger Jersey Shore Hospital; and all Community Practice Service Locations/Geisinger Medical Groups. For purposes of this policy, Vendors are defined as personnel employed by various companies from which Geisinger may purchase general supplies, medical/surgical supplies, pharmaceuticals, devices, equipment, and/or services.

C. Applicability of Policy to Vendors

This policy directly applies to all Vendors including those that provide or wish to provide general supplies, medical/surgical supplies, pharmaceuticals, devices and equipment. This policy further applies to all Vendors that are directly involved in providing services to Geisinger.

D. Applicability of Code of Conduct to all Vendors

All Vendors are guests at Geisinger and as such, must provide their services in accordance with an acceptable Code of Conduct as determined by Geisinger and in a manner that provides the greatest benefit to Geisinger. The ultimate aim of this policy is to ensure that patient care is not influenced by consideration other than what is best for the patients of Geisinger. If you have any questions regarding Geisinger's Code of Conduct, please contact Human Resources at 570-271-6640.

From time to time, individual departments may choose to enact further policies supplementing these requirements. All Vendors are directed to individual departments for further guidance regarding acceptable conduct and behavior on the premises.

E. Clinical Vendors

Geisinger recognizes that there is a necessity for certain Vendors to access patient care areas. Geisinger defines them as “Clinical Vendors”. To control Clinical Vendor access and to help ensure that Clinical Vendors are appropriately trained, authorized and insured by their employers, Geisinger has enacted additional requirements for these Vendors in the form of vendor credentialing. Further details regarding vendor credentialing are provided throughout this policy.

It must be noted that these supplemental vendor credentialing requirements will not apply to all vendor relationships. For example, they will not be applicable to Vendors that require an on-site presence as a condition of providing contracted services. Such services must be documented by a written contract and typically involve service providers that support areas such as Research and Information Systems. The vendor credentialing component of this policy also does not apply to Vendors that are at a Geisinger location upon the request of an appropriate Geisinger representative regarding a service contract with their company, Vendors that are at a Geisinger administrative only location, nor vendor consultants for a one-time visit. However, if the Vendor will be involved in an interventional procedure, they must follow the specific guidelines defined for accessing patient care areas.

Finally, vendors visiting a Geisinger location for the sole purpose of monitoring Institutional Review Board approved research studies are exempt from the vendor credentialing components of this policy on occasions of monitoring only.

RESPONSIBILITIES:

I. Requirements for Vendors and Staff

At all times, it is the responsibility of physicians, residents, trainees and all employees (Staff) to protect the privacy and safety of our patients and to ensure that Geisinger provides quality care. It is necessary that Geisinger conduct all business with Vendors in accordance with the highest ethical standards intended to protect patient confidentiality, within applicable laws and regulations, and to ensure appropriate and cost-effective use of medical devices, supplies, equipment and pharmaceuticals.

Admittance to any of the locations of business of Geisinger by a Vendor is a privilege, not a right. Vendors that conduct business with Geisinger locations must do so in accordance with all established policies and guidelines. It is the responsibility of the Geisinger locations to ensure that Vendors and Staff are knowledgeable of and compliant with these policies and procedures. Staff is responsible to report any suspected violations of these policies and procedures. The following policies must be adhered to by all Vendors:

A. Under most circumstances, Vendors are prohibited from entering patient care areas within Geisinger. An exception to this is a situation in which a Vendor is required for training on new equipment or a device, setting up such equipment, or similar activities associated with new products and equipment. This also includes operating room exceptions where a Vendor's presence is required to support a surgeon as necessary to develop competency with the equipment.

- B. All Vendors entering a patient care area must have made prior arrangements with the physician/surgeon or the management team within the area prior to their arrival. Vendors are only permitted in patient care areas if accompanied by Staff.

- C. If a Vendor's presence is required during a procedure, the following applies:
 - 1. Vendor presence will be documented on the perioperative or other intra-procedure documentation.
 - 2. Vendor is not to enter the sterile field.
 - 3. Vendor is not to open or handle any sterile items to the sterile field.
 - 4. Vendor is not to provide any patient care.
 - 5. Vendor will act as support agent for products only.
 - 6. Only one Vendor is allowed per room/per case unless specific arrangements have been made in advance.
 - 7. Observational Experience Agreement contracts must be completed for each representative present in a procedure. Forms must be kept on file in the department and updated on an annual basis.
 - 8. Patient consent form will include check box to allow for the presence of vendor representatives.

- D. Any/all instruments brought into Geisinger from an outside facility must be processed and sterilized by Geisinger a minimum of twenty-four (24) hours prior to use.

- E. Promotion of drugs against established drug policies is strictly prohibited. Vendors who discuss such agents may be denied access from all Geisinger locations pending review of the event.

- F. Pre-printed prescription pads from Vendors are not permitted at any Geisinger location.

- G. Vendors are not permitted to solicit Geisinger patients or visitors.

- H. All invoices must be issued to the Accounts Payable Department and reference a valid Geisinger purchase order number. Invoices without a Geisinger purchase order number will be denied for payment and Geisinger will be relieved from penalties and held harmless.

- I. Cellular telephones, pagers and other electronic devices must be silenced or turned off if required while in patient areas.

- J. Professional behavior is expected at all times, including adherence to Geisinger Tobacco Use Policy.

- K. Vendors must hold all materials, documents or information disclosed by Geisinger, either directly or indirectly, in the strictest confidence.

L. Parking is permitted in authorized areas only. Vendors should park in the employee parking areas. Parking is not allowed in the main parking area or physician parking areas. Violators may be towed at their own expense.

M. Vendors are not allowed to access physician locker rooms, physician lounges, or employee lounges unless authorized by the department management.

N. Vendors may not provide any food items or gifts to any employee, department, or section of Geisinger for any reason.

O. Vendors will inform Geisinger if Vendor has been sanctioned by Medicare or Medicaid or any other federal or state funded program.

P. Operating Room Bill-Only requisitions will require the circulator from the case to cosign the requisition, as well as, the pod coordinator's signature before submittal for payment. These requisitions must be submitted on the same day as case takes place. Lack of adherence to this process may result in access removal.

If a Vendor is found to be in violation of any Geisinger policy, the privilege to visit any Geisinger location may be suspended for a minimum of thirty (30) days. The Vendor may be permanently denied access to all Geisinger locations for any additional offenses.

PROCEDURE:

I. Procedure

A. All Vendors must have appointments through appropriate departmental or section personnel prior to their visit. Failure to make an appointment prior to arrival on Geisinger property is considered a violation of this policy. With respect to pharmaceutical Vendors, Care Support Services requires that all appointments be initiated by a Geisinger employee or staff member.

B. All Vendors must wear their company badge at all times for immediate identification by Geisinger personnel, including security. Badges must be visible and displayed at all times.

C. No Vendor is allowed on Geisinger premises outside of normal working hours (6:00 am – 8:00 pm) without permission or approval from Geisinger staff. Any Vendor remaining on the premises without approval and/or after work hours may be asked by security or Geisinger staff to leave the premises and may be disciplined as appropriate.

D. All Clinical Vendors (as defined in Section I) are required to register on-line with symplr. The link to register with symplr is located on the Geisinger website (www.geisinger.org) or by going directly to the symplr website (www.symplr.com). Clinical Vendors must be fully credentialed within thirty (30) days of registering. After being credentialed with symplr, the following additional procedures will apply for Clinical Vendors:

1. Clinical Vendors wishing to visit Geisinger departments, sections or clinics must have an appointment and upon arrival on Geisinger property, will report to the appropriate Clinical Vendor registration area between 6:00 am – 8:00 pm, Monday through Friday. The Clinical Vendor registration areas are defined below. Personnel at the Clinical Vendor registration areas are responsible for



identifying and registering Clinical Vendors accessing Geisinger. Clinical Vendor registration areas include:

- a. Geisinger Baltimore Drive - Front Desk
- b. Geisinger Bloomsburg Central Road - Orthopaedics Clinic
- c. Geisinger Bloomsburg Hospital - OR Control Desk
- d. Geisinger Community Medical Center - OR Control Desk and Colfax Avenue Information Desk
- e. Geisinger East Mountain Specialty Clinic - Podiatry
- f. Geisinger Grays Woods - OR Waiting Area
- g. Geisinger Holy Spirit Hospital - Information Desk, Cardiac Cath Lab, and Enterprise Pharmacy
- h. Geisinger Lewistown Hospital - Main Entrance 3rd Floor Entrance and OR Control Desk
- i. Geisinger Medical Center - Information Desk, OR Control Desk, Enterprise Pharmacy, Cardiac Cath Lab, Interventional Radiology, and Outpatient Orthopaedics Clinic
- j. Geisinger Medical Center Woodbine - Outpatient Surgery, Orthopaedics Clinic, and Interventional Pain
- k. Geisinger Orthopaedics and Sports Medicine Scranton – Front Desk
- l. Geisinger Orthopaedics Wilkes-Barre - Front Desk
- m. Geisinger Shamokin Area Community Hospital - OR Control Desk
- n. Geisinger South Wilkes-Barre - OR Waiting Area and Specialty Pharmacy
- o. Geisinger Wyoming Valley Medical Center - Information Desk, OR Control Desk, Enterprise Pharmacy, Cardiac Cath Lab, and Interventional Radiology

If there is difficulty in locating a Clinical Vendor registration area, Clinical Vendors may contact Geisinger Care Support Services at 570-271-6628, option 2 for assistance.

- 2. All Clinical Vendors registered through symplr will be issued a symplr badge. The Clinical Vendors are responsible for maintaining and wearing the badges at all times for immediate identification by Geisinger personnel, including security. Badges must be visible at all times.

3. At the time of arrival, all Clinical Vendors are required to have their symplr badge swiped at one of the specified Clinical Vendor registration areas defined above. They must enter their destination and appointment details into the symplr system. A paper badge will be printed and issued by Geisinger personnel at the registration area. This paper badge must be worn by all Clinical Vendors while on Geisinger premises.

4. Clinical Vendors shall exit through a Clinical Vendor registration area to be checked out of the facility. Failure to check out is traced through symplr and is noted on the Clinical Vendor's profile. Continuous failure to check in and out may result in the Vendor being denied access to Geisinger facilities. Clinical Vendor activity is monitored through centralized monthly over-sight reporting.

II. Categories of Vendor Representatives and Their Documentation Credentialing Requirements

A. Clinical Vendors are considered to be any Vendors that will enter a patient care area and/or procedural area. Patient care areas include but are not limited to inpatient care units, outpatient treatment areas, surgical suites (both inpatient and outpatient), cardiac catheterization laboratories, electrophysiology laboratories, special procedure areas, or any other area where Vendors may have direct patient contact.

B. Non-Clinical Vendors are those Vendors that do not qualify as Clinical Vendors. There are no standard documentation requirements for non-clinical Vendors to visit Geisinger. However, depending on the business need, Geisinger may request non-clinical Vendors to submit specific documentation, including but not limited to, a confidentiality agreement, criminal background check, and/or a signed code of conduct statement.

All Vendors are expected to review the Geisinger website (www.geisinger.org) and become familiar with this Vendor Policy and other required documents that are located there. These include, but are not limited to, Code of Conduct, Federal Deficit Reduction Act Policy, Drug and Alcohol Policy, Health Insurance Portability and Accountability Act (HIPAA), Identity Theft Policy, Tobacco Free Policy, and the Pennsylvania Breach of Personal Information Notification Act.

All Clinical Vendors will require credentialing and documentation management through symplr based on the following levels:

III. Vendor Requirements for the Use of New Products

Note: This section does not apply to pharmaceutical products. All pharmaceutical clinical trials must go through the Institutional Review Board approval process.

A. Under no circumstance should a new product be trialed by a physician on a patient until it has been approved by a clinical use evaluation team unless an exception has been granted by Care Support Services.

B. Product price negotiations will occur with the appropriate Supply Chain Services employee before any new products are used.

- C. The decision to trial a product does not constitute a buying decision. Geisinger will not pay for any trial equipment unless a purchase order has been issued in advance.
- D. No solicitation is allowed in patient care areas, procedural areas, employee lounges or physician lounges.

IV. Department and Staff Responsibilities

- A. Any newly registered Vendors shall be directed to Care Support Services.
- B. All Staff should be observant of others around them. If a Vendor is in an area without an appointment and a badge, Staff should direct them to Care Support Services for education and/or credentialing. Repeated instances should be reported to the Associate Vice President, Procurement Services.

V. Gifts to Staff and Employees

- A. Professional Gifts – Vendors are prohibited from offering professional gifts to Staff. Vendors who desire to make donations for patient care or education purposes are directed to Geisinger Health.
- B. Personal Gifts – No personal gifts of any kind from Vendors are permitted to be given at any Geisinger location or to any Staff.
- C. Vendor Promotional Items – No vendor promotional items (pens, highlighters, paper pads featuring product names, etc.) of any kind are permitted within Geisinger locations.
- D. Printed or Handwritten Materials – Vendors are not permitted to distribute, post, or leave any type of unsolicited printed or handwritten materials, advertisements, signs or invitations at any Geisinger locations.
- E. Vendor Sponsored Raffles, Lotteries, or Contests – Vendor sponsored raffles, lotteries or contests which result in gifts to the winner are forbidden.
- F. Textbooks and Items of Educational Value – Textbooks and items of educational value may be provided to the institution if approved by the department chair/director so long as they are consistent with the Conflict of Interest Policy. All such time items of educational value must be donated through Geisinger Health.
- G. Breakfasts, Lunches, and other Miscellaneous Food Offerings – Geisinger prohibits Vendors from bringing food onto its premises for hosted breakfasts, lunches or other purposes, regardless of whether such food is associated with the provision of continuing medical education credit or any other in-service or educational program.
- H. Continuing Education Programs – Geisinger Staff may not directly accept payments or expenses including costs of admission, food, lodging or transportation for attending CME or other forms of educational sessions. Geisinger will allow limited financial support for Geisinger sponsored CME events or third party professional society sponsored events where actual CME credit is being awarded. Special conditions however, apply to such support and all financial support must flow through Geisinger Health. Please contact Geisinger Health at 570-271-6461 for further details.

Geisinger