March 3, 2009

TTUHSC Faculty and Staff:

Texas Tech University Health Sciences Center (TTUHSC) recognizes the need to effectively manage health care vendor access and possible influence within our facilities from an ethical, regulatory, safety and infection control perspective. Due to these requirements, TTUHSC has developed a policy and program to promote patient, co-worker, and vendor safety as well as patient confidentiality (HSC OP 10.27, Health Care Vendor Interactions). Below please find listed reasons for implementing this program:

- Improve patient and co-worker safety by requiring vendors with patient access to be appropriately vaccinated and healthy
- Verify that vendors are not excluded from participation in federal or state health care programs
- Verify that vendor representatives are properly trained on the equipment/products he/she represents
- Provide a system approach to ensure that vendors are held to the same set of standards across Texas Tech University Health Sciences Center
- Where applicable, meet JOINT COMMISSION regulations related to oversight and credentialing of vendor representatives

In order to support our efforts, TTUHSC has contracted with Vendormate, a credentialing company, to provide education, maintain an online repository of required vendor data, and provide a tool to print real time badges for proper vendor registration.

Talking points are included to provide additional information related to the program.

Please do not hesitate to contact the Institutional Compliance Officer, Millie Johnson (millie.johnson@ttuhsc.edu), with any questions or concerns.

Sincerely,

[Signature]

John C. Baldwin, M.D.
President
Frequently Asked Questions & Talking Points
with Key Stakeholders
Vendor Program

Frequently asked questions:

This document was developed to assist with potential questions and suggested responses as it relates to the new Health Care Vendor Program initiative across Texas Tech University Health Sciences Center (TTUHSC).

What does vendor credentialing mean?

Vendor representative credentialing is a process where sales and service representatives of health care related items/services undergo some form of verification before being permitted into TTUHSC facilities, clinical or patient-care areas. For example, this review/verification of names can include:

- Sanction checks, including, but not limited to, Office of the Inspector General’s (OIG) List of Excluded Individuals/Entities, Government Administration Services list, Texas Medicaid Exclusion List and others.
- Vaccination histories, TB status and others for those with patient interaction.
- Credentialing may also involve infection control training, vendor orientation sessions, and DRA and HIPAA privacy compliance.

A representative told me that Texas Tech University Health Sciences Center is restricting vendor access in our facilities. Physicians have developed significant relationships with representatives and count on them tremendously to provide advice on their products. Why is Texas Tech University Health Sciences Center doing this?

Texas Tech University Health Sciences Center recognizes the need to more effectively manage health care vendor access within our clinics and facilities. The intent of the program is to meet current policy requirements and promote patient, co-worker, and vendor safety and confidentiality.

There are several reasons why Texas Tech University Health Sciences Center is implementing this program, including:

- To improve patient and co-worker safety, through verification of vendor vaccination when there is a potential for patient contact,
- Medicare, Medicaid and the OIG prohibit any health care provider participating in a federally-funded health program from doing business with any party listed in the OIG’s List of Excluded Individuals/Entities or the Texas Medicaid Exclusion List.
The Joint Commission has regulations, both in-force and proposed, which address the need for oversight and credentialing of vendor reps in the healthcare setting.

I'm afraid that the program will be too complex and difficult to enforce. Who is going to manage this program?

Rather than impose a registration burden on our clinics and other staff members, TTUHSC has chosen a vendor credentialing company with web based services. Benefits of technological vendor management tools include:

- Checks to make certain vendors have the documented credentials needed to comply with requirements of federal and state law
- Electronic registration that captures detailed information on whom vendors are seeing, the place and anticipated length of their appointment and what is being marketed
- Identification and vendor badging when on TTUHSC premises.

What is the implication for representatives that refuse to follow the policy?

TTUHSC has a wide range of options available to respond to non-compliance with this policy, including, but not limited to barring the vendor and its representatives from TTUHSC’s premises.

Some vendor representatives may visit TTUHSC infrequently. Are those representatives required to fulfill the same requirements as those that make routine calls?

It is not reasonable or necessary to require all representatives to fulfill the same requirements. The guidelines define three levels of vendor representatives:

- High: Clinical Representatives. These representatives primarily serve in clinical areas, and their role requires them to be in patient care areas.
- Medium: Non-clinical Representatives. These representatives do not serve in clinical support roles and do not enter patient care areas, but come on site frequently.
- Low: These representatives do not come onsite frequently.

Because of the nature of their role, High representatives’ requirements will be more comprehensive in order to meet infection control, HIPAA regulations and Texas Tech University Health Sciences Center policies.

What support is needed to ensure the success of this program?

Faculty and staff support are crucial to the success of this program by insisting that vendors and their representatives are properly registered and credentialed through Vendormate before agreeing to meet with them or allowing them onto TTUHSC premises.