

Vendor Access and Conduct Policy

I. PURPOSE

- A. To establish UC Davis Health's (UCDH) expectations with respect to Vendor Representative requirements and conduct;
- B. To certify that all Vendors and Vendor Representatives are compliant and credentialed within UCDH; and
- C. To establish consistent standards for access to UCDH by authorized Vendor Representatives.

II. SETTING

UCDH

III. DEFINITIONS

- A. Vendor: Any organization or individual that provides, attempts to provide, or is willing to provide goods, equipment, or services of any type to UCDH, regardless of the organization's or individual's expectation of compensation for such good, equipment, or services.
- B. Vendor/Representative: Any individual employed by or representing a Vendor. The following types of individuals are not considered Vendor Representatives for the purposes of conforming with Sections V(A) below:
 - 1. Clinical Engineering Representative: An individual representing vendors who are performing calibration, maintenance, and/or repairs on clinical equipment. Clinical Engineering representatives must follow the processes described in Section V.C below.
 - 2. Building Contractor Representative: An individual representing a vendor who is working under the direction of UC DMC Facilities Design and Construction. Building Contractor Representatives must follow the processes described in Section V.D below.
 - 3. Third-Party Payer Representative: An individual who represents an entity (other than a patient or health care provider) that reimburses and manages health care expenses.
 - 4. Clinical Trials Monitors: Those individuals representing a clinical trial sponsor for the purpose of performing study-related training, and/or monitoring compliance with a study protocol.
 - 5. Delivery Staff: Individuals who are only delivering goods to UCDH locations.

- C. Clinical Representatives: Vendor Representatives who wish to receive access to procedural/clinical areas are designated as “Clinical Representatives.” These vendors are designated as those who access clinical areas and/or will come into contact with workforce members involved in direct patient care.
- D. Off Campus Site: For the purposes of this policy, “Off Campus Site” is defined as a UC Davis Health location that is not part of the Sacramento campus (i.e. Academic & Network Clinics).
- E. Reptrax: The vendor credentialing system utilized by UCDH to capture, credential, and monitor vendors

IV. POLICY

A. Accountability

1. *Purchasing*: The Purchasing Department is responsible for maintaining the UCDH Vendor Access Program. The Program is designed to inform Vendor Representatives about UCDH’s expectations about vendor interactions and to gather pertinent business information about each Vendor Representative and the Vendor he/she represents. Purchasing is specifically responsible for:
 - a. Maintaining the Reptrax application, including but not limited to:
 - 1) Annually ensuring that the most current policies are uploaded into the Reptrax application and required for the appropriate vendor category.
 - 2) Enforcing vendor access policies and implementing disciplinary action, as needed.
 - 3) Managing the day-to-day operational activities of the on-site vendor monitoring process including, but not limited to kiosk management and vendor/staff communications.
 - 4) Reviewing and approving vendor requests for credentialing exceptions as appropriate in accordance with this policy.
 - b. Supporting departmental implementation of Reptrax.
 - c. Reporting all instances or suspected instances of non-compliance to the Compliance Department immediately.
2. *Compliance*.: The Compliance Department is responsible for:
 - a. Conducting an annual review of the Vendor Access Program to ensure established policies, administrative user access, vendor credentialing requirements, and other vendor access processes are current and appropriate.
 - b. Auditing the UCDH vendor monitoring process and ensuring compliance with UCDH vendor relations/vendor access policies.
 - c. Providing routine reports to the Industry Relations Committee (IRC) regarding activities associated with the Vendor Access Program.
 - d. Monitoring compliance with and enforcement of vendor access policies and

ensure that disciplinary action is carried out as needed, or at the recommendation of the IRC.

- e. Identify potential vendor relations risks and propose issue resolution to the IRC on a periodic basis.

3. *UCDH Departments and Clinic Locations:* UCDH departments should, as deemed appropriate, build upon and enhance vendor control policies in order to meet the individual needs of each location. Locations that allow Vendor Representatives access to their respective areas must ensure that the following procedures are followed:

- a. Vendor Registration
- b. Vendor Representative Check-in & Check-out
- c. Badging
- d. Incident Reporting
- e. Training on department specific policies and guidelines

4. *Workforce Responsibility*

It is the responsibility of all UCDH workforce members to understand and enforce the contents of this policy. Violation of these guidelines may result in disciplinary action for all employees involved, up to and including termination. Workforce members are expected to:

- a. Ensure Reprax badge is worn by all vendor representatives and is visible.
- b. Communicate failure to meet set standards outlined in this policy to Purchasing for further action.

5. *Vendors and Vendor Representatives*

- a. All Vendors are required to follow this policy, as well as any additional policies and guidelines per the respective areas in which they wish to obtain access.
- b. Vendor Representatives are expected to respect and comply with UCDH guidelines governing their conduct.
- c. The presentation of products and services by a Vendor Representative at UCDH is a privilege, not a right.
- d. Vendors wishing to do business with UCDH must undergo all requisite background checks and health screenings required for each Vendor Representative who visits the campus.
- e. Vendors must comply with applicable UCDH confidentiality and privacy policies and procedures.
- f. Vendor Representatives who fail to comply with UCDH policies or legal/regulatory requirements are subject to reprimand, up to and including termination of visiting privileges.
- g. Vendors may not provide giveaways of any nature, (including gifts of nominal value such as pens, note pads, coffee/ coffee mugs, gift cards, etc.) to UCDH workforce members.

V. PROCEDURES

A. Vendor Access to All UCDH Facilities

To obtain access to a UCDH facility, all Vendors and Vendor Representatives must adhere to the following:

1. *Reptrax Registration:* To obtain access to a UCDH facility, all Vendor Representatives must first complete the Reptrax registration process. Reptrax registration can be completed through the Reptrax website.
 - a. Vendor Representatives must read, acknowledge and complete all UCDH credentialing and training requirements prior to visitation.
 - b. Reptrax credentialing requirements are imposed based upon a Vendor Representative's expected level of access and intended function. These credentialing requirements may include, but are not limited to:
 - 1) Policy Review and Acknowledgement
 - 2) Proof of Employer General Liability Coverage
 - 3) HIPAA Training
 - 4) SAM/OIG Exclusions Screening
 - 5) Vaccination Requirements¹
 - c. Clinical Representatives may have additional credentialing requirements that must be completed before access to clinical/procedural areas.
 - d. A Vendor Representative's registration application will be confirmed by Reptrax and published to the UCDH Reptrax profile.
 - e. The Vendor Representative must read, acknowledge, and complete all applicable policies and requirements in Reptrax prior to obtaining access to a UCDH facility.
 - f. Representatives whose Reptrax badge is labeled "MASK" must wear a mask at all times while on UCDH facilities in accordance with UCDCM P&P 2010.
2. *Vendor Representative Check-In:* Upon arriving at a UCDH facility, all Vendor Representatives must check-in at a UCDH Reptrax kiosk or via the UCDH mobile Kiosk application:
 - a. For visits to UCDH locations on the Sacramento campus, Reptrax Kiosks are located at the following locations:
 - 1) Main Hospital Pavilion Information Desk
 - 2) Ellison Ambulatory Care Center, East Entrance Information Desk
 - 3) Same Day Surgery Center, the Cancer Center,
 - 4) Clinical Engineering,
 - 5) Facilities Support Services Building

¹ See Attachment A for Credentialing Matrix

- b. For individuals utilizing the sign in to Reptrax using a UCDH mobile Kiosk, copies of applicable policies and procedures are available by contacting the Purchasing Department at (916) 734-2475.
3. **Badging:** Following check-in, a Vendor Representative must obtain an identification badge, to be worn at all times while on UCDH premises.
- a. A new Reptrax badge should be secured each time a Vendor Representative visits a new location or the purpose of their visit changes.
 - b. All Reptrax badges are property of UCDH and are nontransferable.
 - c. All badges are be subject to inspection by University of California (UCD) Police officers, Fire Prevention officers, Protective Service Officers, supervisors, or administrators at any time, for any reason in accordance with Policy [2900](#).
 - d. All Reptrax badges must use the representative's full legal name. The first name of the representative may be a chosen name that the representative goes by or prefers to be called. It is the responsibility of the representative and their company to ensure the representative's Reptrax registration information is accurate, current and appropriate.
 - e. All Reptrax badges should include a picture of the representative's face, whenever possible.
 - f. Representatives using Reptrax badges must identify the name of the UCDH department and personnel they are visiting during checking-in. The full department and personnel name shall be used whenever possible.
4. **Appointments:** Vendor Representatives may meet with UCDH personnel by invitation and appointment only. Appointments may only be scheduled with those Vendors that have completed the Reptrax registration process. Appointments will be scheduled based on the operational needs of the department.
5. **Vendor Representative Check-Out:** Upon leaving UCDH, all Vendor Representatives are required to sign out of Reptrax.
6. **Vendor Use of UCDH Facilities**
- a. Vendor Representatives shall conduct their business outside of patient care areas to the extent possible.
 - b. Vendor Representatives shall not enter supply rooms unless accompanied by a UCDH staff member.
 - c. Vendor Representatives may not use UCDH equipment, including telephones, fax machines, copiers, etc., without prior department management approval.
 - d. Vendor Representatives shall agree to a confidentiality agreement to protect the health information of our patients. The following are acceptable in lieu of a confidentiality agreement:
 - 1) A HIPAA Business Associate Agreement,
 - 2) A determination by the Compliance Department that the vendor is acting as a member of a covered entity (as defined by HIPAA), or
 - 3) Provisions to ensure that the vendor does not have access to protected health information.

B. Vendor Access to Specific UCDH Locations

1. *Access to Clinical Areas*

- a. Vendors seeking access to clinical/procedural areas must check-in to Reprax as a Clinical Representative and meet all applicable credentialing requirements.
- b. At the discretion of the UCDH workforce member involved in a clinical case, Vendors are permitted to access clinical areas and procedures, where the Vendor Representative's presence serves a legitimate clinical purpose.
- c. Authorized UCDH staff must accompany a Vendor Representative at all times in patient areas.

2. *Off-Campus Sites*

- a. *Badging:* Off-Campus sites without Reprax badge printing capabilities are responsible for developing a process to badge/identify vendors who have successfully checked-in to Reprax.
 - 1) For example, sites may provide a temporary or reusable badge to representatives who have successfully checked-in to Reprax using the mobile application.
 - 2) Sites should confirm successful check-in to Reprax in accordance with this policy prior to allowing the representative to visit. This includes but is not limited to confirming the representative has checked-in to the correct UCDH location and has an appointment.
- b. *Access to Clinical Areas:* Vendors visiting Off Campus sites must be escorted by a UCDH employee at all times while in patient care areas.

C. Vendor Access Requirements for Clinical Engineering Representatives

1. Clinical Engineering Representatives are required to sign in with Clinical Engineering prior to proceeding to the repair site.
2. Each Clinical Engineering Representative will receive a badge, authorizing him/her to be on UCDH grounds for repair work.
3. Clinical Engineering Representatives with long-term, full-time assignments at UCDH may receive laminated temporary badges with their name, company name, and work area listed, at management's discretion.
4. Clinical Engineering Representatives must sign out with Clinical Engineering when work is complete.
5. Clinical Engineering equipment service representatives who arrive between the hours of 5:00 p.m. and 8:00 a.m. or weekends and holidays who do not have a previously assigned laminated badge are required to check in at the Tower Lobby Information Desk.

D. Vendor Access Requirements for Building Contractor Representatives

1. UCDH Facilities Design and Construction (FD&C) is responsible for coordinating and administering a process to validate, check-in/check-out and identify all Building Contractor Representatives working with the department.

2. This process should follow and conform with all construction requirements and documentation for the allotted project.
3. Building Contractor Representatives shall follow all guidelines established by FD&C at all times while on site at any UCDH facility.
4. All vendors sponsoring Building Contractor Representatives must ensure that the conduct of employees/agents or representatives adheres to the requirements of UCDH at all times while on the premises.

E. Incident Reporting

All Vendors, Vendor Representatives and Workforce members are expected to comply with these Vendor guidelines. All incidents or suspected incidents of non-compliance should be immediate reported to the Compliance Department at: (916) 734-8808.

REFERENCES

UCOP Guidelines Regarding Vendor Relations

UCDH Code of Conduct Principles and Standards

UCDH Policies and Procedures:

[1705](#), Conflict of Interest

[2204](#), Vendor Gifts

[2203](#), Patient Care Product Standardization and Utilization

[2526](#), Pharmaceutical Manufacturers' Representatives

[2900](#), Identification Badges

UC Davis P&P:

380-16, Conflict of Interest

380-55, Acceptance or Offering of Gifts and Gratuities by University Employees

Sent to the following for review:

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