



Vendor Access and Conduct Policy

PURPOSE

The purposes of this policy are (1) to establish The University of Texas Health San Antonio expectations with respect to vendor representatives' conduct, ethics, and UTHSA relationships; and (2) to certify vendors as "business ready" within UTHSA, and (3) to define the appropriate channels for access to UTHSA facilities and the expectations of appropriate conduct for vendor representatives while on UTHSA premises.

POLICY STATEMENT

It is the policy of UTHSA to ensure operational excellence by requiring its vendors to uphold certain standards of conduct and ethics. Vendors must adhere to certain restrictions regarding vendor access to the institution's facilities. UTHSA has established these standards of conduct to ensure compliance with applicable laws, regulations, policies, and procedures and to protect the safety of patients, visitors, and employees.

SCOPE

The scope of this policy applies to all UTHSA facilities and entities, as well as all vendors and their representatives who solicit business from UTHSA or UTHSA workforce members. All UTHSA workforce members are expected to adhere to this policy when interacting with vendors.

STRATEGIC VISION

Please select one or a combination of the following:

Strategic Goal 1: Patient Care

Enhance the quality and value of our patient care throughout the cancer care cycle.

Strategic Goal 6: Collaboration

Enhance and disseminate our knowledge in all mission areas through collaborative and productive relationships locally, nationally, and worldwide.

Strategic Goal 7: Resources

Safeguard and enhance our resources.

DEFINITIONS

Vendor – any organization or individual, whether a sole proprietor, partner, agent, employee, or representative of any organization that provides, attempts to provide, or is willing to provide goods, equipment, or services of any type to UTHSA, including, but not limited to, any staff or technical assistants, regardless of the organizations or individual’s expectation of compensation for such goods, equipment, or services. Vendors are not those individuals identified as Contractors. Any vendor known to have a Contractor badge will be asked to surrender it upon request.

Contractor - Any organization or individual that is contracted with UTHSA to perform a service at any building of UTHSA Cancer Center for any period of time. Those identified as “Contractors” must follow the appropriate Human Resources procedure for obtaining a “Contractor” badge.

Registered Vendor – a vendor registered with Vendormate and approved for access to UTHSA facilities.

Procedural Area – Areas in which there is contact or potential contact with patients or medical/surgical facilities.

Non-Procedural Area – Areas in which there is no potential contact with patients and medical/surgical areas.

Clinical Representatives - Vendors that wish to receive access to procedural/clinical areas are designated as Clinical Representatives. These vendors are designated as those that access clinical areas and/or will come into contact with workforce members involved in direct patient care.

Non-Clinical Representatives - Vendors that wish to receive access to non-procedural/non-clinical areas are designated as Non-Clinical Representatives. These vendors are designated as those that do not require access to clinical areas or those that do not interact with workforce members involved in direct patient care.

Tailgating or Piggybacking – Unregistered persons accompanying those that are registered is strictly prohibited.

PROCEDURE

1.0 Accountability

1.1 Supply Chain Management

The Assistant Vice President, Supply Chain Management will manage and maintain the UTHSA Vendor Access Program. This program is designed to inform vendor representatives of UTHSA expectations and to gather pertinent business information about each vendor and the company he / she represents. Supply Chain Management is specifically responsible for:

- Vendormate Contract and Relationship
- Communicating policy and documentation updates to Green Security
- Departmental Training

1.2 Individual Departments

UTHSA departments should, as deemed appropriate, build upon, and enhance vendor control policies tailored to meet the individual needs of the respective department.

It is the responsibility of each department which allows vendors to access their respective area to ensure that the following procedures are followed:

- Check-in
- Badging
- Check-out
- Incident Reporting
- Training on department specific policies and guidelines

1.3 Individual Employees

It is the responsibility of all UTHSA workforce members to understand and enforce the contents of this policy.

Violation of these guidelines may result in disciplinary action for the trainee, faculty member or other employee involved, up to and including termination.

1.4 Vendor

All vendors are required to follow this policy, as well as any additional policies and guidelines per the respective department in which they wish to obtain access.

Vendors wishing to do business with UTHSA must allow for background checks and health screenings. (See Guidance Document #1). Vendors must comply with applicable UTHSA confidentiality and premises policies and procedures.

2.0 Vendor Policy

It shall be the practice of all UTHSA workforce members to interact with vendors in a fair, honest, and courteous manner. Likewise, vendor representatives are expected to respect and comply with UTHSA guidelines governing their conduct.

The representation of products and services by vendor representatives at an UTHSA facility is a privilege, not a right.

The need to safeguard UTHSA patients' rights to privacy and confidentiality as defined by the Health Insurance Portability and Accountability Act (HIPAA), and to preserve the integrity of the environment of care for caregivers and medical staff, requires UTHSA to construct and enforce reasonable guidelines for appropriate vendor access and behavior.

3.0 Procedures/Guidelines/Expectations

All vendors must adhere to the following steps to obtain Non-Clinical access to UTHSA:

- 3.1 To obtain access to an UTHSA Facility or employee for business purposes, all vendors must first complete the Green Security Registration Process that will be accessed through the Green Security website: <https://grn.ac/uthealth-vendors> and complete the appropriate orientation and testing requirements before scheduling appointments.
- 3.2 A Registration application will be confirmed and routed by Green Security to the appropriate business contact within Green Security verification.
- 3.3 Vendors will also become knowledgeable of all UTHSA vendor-related policies and guidelines prior to scheduling their first appointment in an UTHSA facility.
- 3.4 A vendor may obtain access to an UTHSA facility or employee only by an appointment scheduled in advance. Appointments may only be scheduled for those vendors that have completed the Green Security Registration Process. Appointments will be scheduled based on the operational needs of the respective departments. Completing the Green Security Registration Process does not guarantee an appointment with any UTHSA workforce member.
- 3.5 Prior to a vendor's appointment the vendor must sign in at the appropriate Department and obtain a vendor identification badge. Vendors must wear an identification badge at all times while on UTHSA premises. Vendors must report lost or stolen badges to the Supply Chain Management office.
- 3.6 At the conclusion of the vendor's appointment, the vendor must sign out at the appropriate kiosk and discard the identification badge. The vendor must also document on the sign-out sheet any product samples or equipment left at the institution that day and the name of the individual who took possession of the samples or equipment.
- 3.7 A Registered Vendor database will be placed on the Green Security web page via the intranet. This database will be accessible to all UTHSA workforce members.
 - 3.1.1 Specific Immunization and Testing must be completed before access is granted (See Guidance Document #1 and #2)
 - 3.1.2 The UTHSA extended orientation for clinical representatives must be completed.
 - 3.1.3 The vendor must attend any department specific training required.
 - 3.1.4 Patient Informed Consent/Authorization must be reviewed and signed before entering a patient room or area where patient information may be exposed.

4.0 General Guidelines for Vendor Conduct

While the following list is not all-inclusive, the list does provide some general procedures that vendors are expected to follow.

4.1 There will be no unscheduled calls to UTHSA facilities. Vendors will make appointments with appropriate staff prior to arriving at UTHSA facilities.

4.2 Appointments should be scheduled between 8:00 a.m. and 4:30 p.m., Monday through Friday. Exceptions may be granted by the Director of the respective department or his / her designated representative.

4.3 Vendors should try to limit their appointments to no more than twenty (20) minutes. If a vendor requires more than twenty (20) minutes for an appointment, the vendor should request the additional time when scheduling the appointment. Vendors are required to leave UTHSA premises at the conclusion of their appointments and may not initiate unscheduled visits with any UTHSA employees or representatives either before or after a scheduled appointment.

4.4 When permission is granted to a vendor to be on UTHSA premises, the vendor is expected to proceed directly to the area of his / her appointment, succinctly conduct their business, and depart the premises.

4.5 Vendors are prohibited from offering food, gifts, or other incentives to any UTHSA workforce members, including attending physicians, while on UTHSA premises.

4.6 Vendor Badging: Vendors must wear identification badges at all times while on UTHSA premises.

4.7 Vendor Parking: Vendors must park in general public parking. No vendor parking is permitted in designed patient, physician, or service areas.

4.8 Smoking Policy: Smoking and the use of smokeless tobacco products are prohibited at any time on property owned or under the control of UTHSA (inside or outside of buildings).

4.9 Vendor Providing Case Specific Product or Equipment: To be developed.

5.0 Vendor Access to Clinical Areas

5.1 In order for a vendor to enter any UTHSA nursing unit, patient room, patient treatment room, clinic, clinical/research laboratory, or operating room, the appropriate UTHSA workforce member must obtain written approval from the authorizing department and a signed Informed Consent/Authorization form from the patient involved prior to any patient interaction or observation.

5.2 At the discretion of the physicians, manager, and the patient involved, vendors are permitted access to invasive procedure rooms during procedures. Patients must complete an Informed consent/authorization form prior to the procedure at issue. An objection, at any time, from either the patient or a physician, bars vendor entry to an invasive procedure area.

5.3 Patients may revoke their consent/authorization to permit vendor access to treatment, procedures, or other personal information at any time.

5.4 Appropriate documentation should be placed in the patient's chart to indicate the patient's consent/authorization, denial, or revocation of vendor access.

5.5. Authorized UTHSA staff will accompany vendors at all times in patient care areas.

5.6 Vendors seeking access to clinical/procedural areas must check in at the designated area.

5.7 In the absence of an Informed Consent/Authorization and physician consent: a vendor may not assist in patient care; a vendor should not scrub in to become part of the sterile field; and a vendor may not touch the patient as doing so without specific written permission constitutes a felony. Unless licensed specifically for the respective equipment, a vendor may not operate any equipment associated with the surgical procedure. Operating surgical equipment for the procedure without proper licensing constitutes practicing medicine

6.0 Radiation Areas

When a vendor requires access to restricted radiation areas which present potential exposure, it will become the UTHSA department's responsibility to notify the Radiation Safety Officer (RSO). Notification is required prior to entry into the area that contains radioactive material or radiation producing equipment. The RSO may stipulate specific procedures that must be followed in High Risk areas.

7.0 Biological & Chemical Areas

Notification is required prior to entry into the area that contains biological and chemical material. The Biological & Chemical Section's representative may stipulate procedures that must be followed in High Risk areas.

8.0 Product Displays, Loaner/Demonstration Equipment

Product displays may be permitted around UTHSA conference rooms and other non-patient care locations upon approval of the Facilities Services Manager responsible for overseeing the use of UTHSA's public spaces, who will consult with other departments involved with the product displays as necessary (e.g., Continuing Medical Education or Supply Chain Management). At the end of the time permitted for the display, the vendor must remove all product samples and related materials from the area. Vendors are responsible for ensuring that the appropriate Supply Chain Management personnel are aware of, and have approved, the use of all evaluation products. All products new to the institution shall be vetted through the respective UTHSA Value Analysis Team or MUE Committee.

8.1 Products brought on site for loan or assessment purposes must be approved by the respective approval agency (e.g., the Food and Drug Administration or Underwriters Laboratory).

8.2 When equipment is loaned or demonstrated by a vendor, the vendor must complete and sign a Vendor Release Form **before** delivering such equipment to UTHSA. **Products brought into the facility and used without the prior approval of the respective departmental management are considered items donated to UTHSA, and vendor invoices for such items will be rejected.**

8.3 The Biomedical Services Department must inspect and approve all electronic medical equipment before such equipment is demonstrated to, distributed to or used by any UTHSA department. Upon successful testing and inspection, the Biomedical Services Department will place a red inspection sticker on the equipment. Equipment entering any operating room more than once must be inspected by Biomedical Services each time.

8.4 Appropriate training must be provided to or obtained by UTHSA workforce members prior to their using the equipment brought in by vendors for loan or assessment. Training must be documented according to individual departmental guidelines.

8.5 Vendors providing any equipment for purposes of a loan or an assessment are responsible for removing the equipment after the loan or assessment is complete and must pay any return shipping charges.

8.6 UTHSA is not responsible for any equipment left on site for more than twenty (20) days after completion of the loan or assessment.

8.7 Vendor must notify the Biomedical Services Department when removing from UTHSA premises the equipment that was the subject of a loan or an assessment.

9.0 Violation of Vendor Policies

Penalty for Non-compliance: When vendor conduct does not comply with UTHSA guidelines, a vendor's privilege to access all UTHSA facilities may be terminated. In such cases, the respective "business owner," i.e., the applicable Department Director, should work in collaboration with the AVP, Supply Chain Management, to restrict vendor access.

Violations of this Vendor Access Policy will have the following consequences, as appropriate:

The University of Texas Police Department (UTPD) may request to inspect a vendor's identification badge. UTPD may take effective action against all vendors if they fail to register with the applicable Supply Chain Management office, fail to schedule appointments before appearing on UTHSA premises, and fail to wear a vendor identification badge at all times, or otherwise violate this Vendor Access policy.

UTHSA may request the vendor to assign a different vendor representative to conduct business with the institution.

UTHSA may deny further access to UTHSA facilities by any representative of such vendor and remove the vendor from the institution's list of Registered Vendors. Once access has been denied due to policy violations, a vendor may be reinstated as a Registered Vendor only by submitting a written petition for reinstatement to the Assistant Vice President, Supply Chain Management, as applicable.

For repeated violations, UTHSA may elect to terminate any existing contract with the vendor according to the contract's terms.

Violation of these guidelines may result in disciplinary action for the trainee, faculty member or other employee involved, up to and including termination.

