



Policy: *Vendor / Contractor*

Responsible Office: Materials Management	Category: Finance
Authorized: Executive Vice President Chief Operating Officer	Policy Number: ADM-V001
Review Frequency: 2 years	Effective: 12/2008

Policy Statement

- I. This policy provides an institutional position regarding the control and conduct of vendors that visit our facility.
- II. Enforcement of this policy will be the responsibility of Center staff and affiliates located at a Center facility (e.g., University of South Florida (USF) Faculty, USF Medical Services Support Corporation, University Medical Services Association, USF Physicians Group). This policy overrides and supersedes any other departmental guidance regarding these issues.
- III. For purposes of this policy:
 - A. Patient access includes but is not limited to: direct patient contact (in person, by phone or other communication means); presence during discussion of patient specific information; patient specific clinical or research documentation (hard copy or electronic).
 - B. Vendors bringing any devices that can access the Center's Networks and Systems, may include but not limited to:
 - Wireless devices or PDA's
 - Laptops or Desktop PC's
 - Any Bluetooth or similar device, including Cell Phones
 - Any external storage device that may be connected to the Center Network such as, USB external storage device, PCMCIA Cards, etc
- IV. General Guidance
 - A. Vendors/contractors will be expected to abide by the Center's Code of Ethics and Business Conduct in all their dealings with the Center.
 - B. All vendors entering the Center or Research premises will be required to visit one of the registration desks to obtain a Moffitt-issued badge. The vendor/contractor shall wear the temporary badge visibly on the upper torso. Upon completion of the appointment, vendors/contractors shall return to the lobby and turn in the badge.
 - C. Vendors/contractors are required to establish appointments with specific individuals in advance of their visit to the Center.
 - D. Vendors will not have direct access to server rooms, IDF closets and data centers. If they need access to a server room, IDF closet or data center, then they will have to be escorted and accompanied during their time there.
 - E. Vendors/contractors working for Moffitt for more than three (3) days shall obtain a Moffitt badge from Human Resources (Refer to Identification Badge Policy #WR-6).
 - F. The practice commonly referred to as "cold calling" is not permitted and vendors without valid appointments may be requested to leave the premises. They will be instructed to contact the Materiel Management Department.
 - G. Vendors/contractors that violate this policy may be asked to leave the premises immediately and may be prohibited from returning in the future if the transgression caused any disruption

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in any Center operation or patient care related service.

- H. Vendors/contractors shall be escorted at all times by staff any time the visitation occurs in a sensitive area to include: business offices, research areas, Human Resources, physician offices/suites, Health Information Management Department, Facilities, Pharmacy, the Operating Room or areas where patients are treated or being counseled.

V. Patient Confidentiality

- A. All vendors/contractors working at the Center must abide by the Center's Confidentiality Policy (#ADM-C017) and will be required to sign an Information Systems Confidentiality and Software Compliance Agreement. It is the responsibility of the management of the department who has primary contact with the vendor/contractor to attain the signature on the agreement. The signed agreements will reside with the Information Security Officer.
- B. Patient privacy and patient-specific information will always be safeguarded, as required by law, and the Policies of the Center.
- C. Vendors/contractors will not be provided patient information without specific patient authorization. In support of research, and according to policy, data may be provided with any patient information redacted.
- D. Vendors/contractors may be permitted in patient care areas, and allowed access to patient records only when essential for purposes of new equipment installation, calibration and training, or problem solving. In these instances, all policies pertaining to patient confidentiality will be followed.
- E. Vendors/contractors will not be allowed to participate, or otherwise attend Case Conferences where specific patient information is discussed unless they are attending a Center-approved preceptorship.
- F. Vendors/contractors are prohibited from directly contacting patients of the Center with the intent of promoting their product.

VI. Product Samples

- A. To insure proper control, quality, storage and dispensing records, all drugs within the institution fall under the control of the Department of Pharmacy. Sample drugs within the institution are not exempt from this requirement.
- B. Food samples must reside within Food & Nutrition Services Department.
- C. All other equipment and supply samples must reside within Materiel Management and require product evaluation and review prior to distribution. Recommended modifications to the product may be submitted to the chairman of the Product Evaluation and Standardization Committee for consideration, if appropriate.

VII. Vendor Displays

- A. Vendor/contractor displays, including literature and/or collateral materials, will only be permitted when authorized as part of a Center approved event. Sales displays with the intent of soliciting business are not otherwise permitted.
- B. Pharmacy vendor displays, literature and collateral materials will not be permitted for non-formulary drugs.

VIII. Seminars and Continuing Education

- A. All programs sponsored by the Center which involve vendor/contractor contributions/support, or that involve conference registrations must be coordinated with the
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Continuing Education Department and are governed by Accreditation Council for Continuing Medical Education (ACCME) guidelines.

- B. Vendor/contractor displays would be permitted at continuing education events in accordance with the Continuing Education Activities Policy.

IX. Drug Studies

- A. The Center supports advancement in clinical research through the use of approved clinical trials and drug studies. All studies involving patients must receive the approval of the USF Institutional Review Board and must follow applicable guidelines.

X. Drug Formulary

- A. Non-formulary drugs will not be allowed for general use, and may not be promoted to Programs in seminars or continuing education programs.
- B. The Center's Pharmacy & Therapeutics (P&T) Committee approved drug formulary must be supported and counter-detailing will not be permitted.
- C. Recommended modifications to the drug formulary may be submitted to the chairman of the P&T Committee for consideration, if appropriate.

XI. Network and System Access

- A. Vendor technology is defined as any hardware or software that is in the possession of, or used by a vendor/contractor while either on the Center premises or offsite; accessing the Center's systems or Networks; or in proximity of the Center's wireless network that may be affected or accessed.
- B. Any vendor/contractor/technical support persons accessing any Center system or network either on premises or remotely, will have Center-approved Anti-Virus Software installed on any device used for access.
- C. Vendor access to Systems must be done according to Moffitt IT Security and Technical Standards as defined in the Center's approved policies. Application changes and activity in the production environment will be monitored.
- D. All Vendors/contractors will be required to follow the internal Change Control Requirements of Moffitt and all changes will be monitored.

Purpose

This policy provides vendors and contractors desiring to do business with the Center with guidance in the following areas:

- Procedures to follow while on the premises of the Center;
 - Acceptable access by vendors/contractors to patients of the Center and/or related patient-specific clinical or research information;
 - Provision of vendor/contractor product samples on the Center premises;
 - Establishment of vendor/contractor displays on the Center premises;
 - Participation of vendors/contractors in seminars and/or continuing education programs (Refer to Conference Planning Policy – Financial Issues In Conference Planning ADM-C019);
 - Initiation of drug studies;
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- Initiation of non-formulary drug use.

At no time is this policy meant to limit access or reduce competition.

Scope

This policy applies to all vendors/contractors who are on the Center's premises with the intent of soliciting business, or promoting their products and/or services. The listing of vendors includes, but is not limited to outside auditors, architectural and contractors of all trades, consultant, and sales/marketing representatives.

Stakeholders: Pharmacy, Corporate Compliance, Information Technology, Safety/Security, Research

Procedures

I. Badge Distribution

- A. Vendors/Contractors are required to visit the registration desk to obtain a Moffitt badge. The Moffitt main lobby desk is the designated vendor receiving location for all non-business hour visits. Registration desks are available at the following locations:
- Moffitt Cancer Center Main Lobby Open 24 hours/7 days per week
 - Moffitt Clinic Building Lobby 6:00 a.m. – 5:00 p.m. (M-F)
 - Stabile Research Building 8:00 a.m. – 4:30 p.m. (M-F)
 - Moffitt Research Building 7:00 a.m. – 4:00 p.m. (M-F)
- B. Each registration desk will require a valid photo ID for identification. At each registration desk, Moffitt staff will prepare a temporary photo badge that identifies the photo, name and location of the intended visit. Reception staff shall direct the vendor to the approved appointment location or call the receiving department for vendor instructions.

II. Information Technology

- A. All activity in a production environment undertaken by a Vendor/Contractor will be monitored. Infrastructure changes such as, O/S, hardware upgrade(s), and other system changes will be monitored by Tech Services. Any changes that are being made outside the approved infrastructure changes will be halted immediately by the Technology Services Monitor.
- B. Application changes – upgrade to the application – Specific application group within IT supporting the application should monitor these changes. Any changes that are being made outside the approved application changes will be halted immediately by the Application Monitor.
- C. Vendor/contractor/technical support persons accessing any Center system or network either on premises or remotely, will have installed the latest anti-virus information on any device used for access as of the day that access is attempted. This will be performed by the vendor for every day the system or network is accessed and will be verified to have been performed by the IT Department custodian for the vendor. The Department Manager of the area for which the vendor is working, will have the ultimate responsibility for ensuring this process takes place. IT support can be obtained through normal Helpdesk procedures. Any deviation from Moffitt IT Standards require an alternative solution to be developed by the vendor in conjunction with the center IT department before introducing any such devices into the center's network.
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- D. Vendors making system changes are required to follow Moffitt's established requirements:
1. Vendors must submit a comprehensive list of what they are about to change and on which system, so that the IT custodian can schedule this through change control.
 2. The IT custodian will be held accountable to make sure that the vendor is only following the submitted changes and that all of the above have been tested prior in the test environment (at Moffitt).
 3. The IT Support Personnel that are on-call will respond to Emergency Changes or unplanned outages. At least one IT Support Person that is on-call will have the ability to grant a vendor access immediately in the event of a system failure.

Education

N/A

Definitions

N/A

References

N/A

Appendices

Sample Badge Illustration

Revision History

08/1989, 05/1993, 11/1995, 12/1995, 01/1999, 09/2000, 08/2004, 04/2007, 12/2008v2