

Access and Engagement Requirements for Meridian Approved Vendors Administrative Guidelines

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General Description

Purpose:

1. To establish minimum clearance requirements for certain vendors including health, background screenings and orientation attendance.
2. To ensure compliance with the requirements established by federal and state regulations as well as those set forth by accrediting agencies, such as The Joint Commission.
3. These requirements are intended to ensure Meridian Health is providing a safe environment for all patients, team members, physicians, volunteers and guest.

Scope:

All members of the Meridian Health workforce who have business relationships with vendors as defined in this policy, business associates, vendors and contractors.

Policy:

Vendors seeking to do business on site with Meridian Health shall:

- Complete the prescribed requirements for the Vendor Classification applicable to such Vendor related to background checks, health screening, immunizations, and orientation as noted in the "Vendor Requirements" Exhibit – attachment to this policy.
- Maintain the confidentiality of information about Meridian patients, employees, organization, strategies and operations.

- Adhere to all applicable Meridian Code of Conduct and Compliance Policies as well as all applicable regulations, including but not limited to the “False Claims Act”, the “Deficit Reduction Act” as set forth in “Vendor Information” section of the Meridian website: <http://www.meridianhealth.com>.
- Promptly notify Meridian of the voluntary or involuntary termination of individuals authorized to perform on site services on their behalf.
- If applicable, agree to adhere to all policies and procedures related to the use of Meridian Information Systems.

1. Vendor Levels of Access:

Level 1 Vendors meeting the established requirement may have access to the sterile areas and or areas where anesthesia may be used.

Level 2 Vendors meeting the established requirements may have access to patient care areas excluding sterile and areas where anesthesia may be administered.

Level 3 Vendors meeting the established requirement providing services in non-patient care areas.

Level 4 Contracted services involving licensed care providers who will be handled through established credentialing processes separate from Reptrax.

Level 5 Patient visitors, guests, educational attendees.

B. Vendor Classifications:

The category that the vendor falls into (see below) will determine the necessary requirements that the vendor must satisfy.

Patient Contact Category

(Level 1 or Level 2 Vendor Access)

Vendor who performs the tasks of a Direct or Indirect Patient Care Provider and will have patient contact, potential patient contact, or contact with Meridian team members who are direct or indirect patient care providers.

By way of example: travel and agency nurses, physicists, perfusionists, HIM ROI staff, on site Clinical Program Developers and other practice based consultants, contracted Environmental Services staff, Medical Device Representatives or other representatives who in the performance of their role are present in patient care areas such as the Operating Room, Cardiac Catheterization suites.

Medical/Business Record Category
(Level 3 Vendor Access)

Vendors with access to Meridian confidential information only, involving no contact with direct or indirect care providers. No presence in patient care areas is required. Vendors are engaged to perform a time limited, specific task, with access to Meridian confidential information, in any media.

Includes: External Chart Auditors (i.e. payors, no fault not External Case Managers), external financial auditors billing/coding auditors.

Law Enforcement Category (Level 4 Vendor Access)

Including civilian and military officers are not vendors, but are required to be on site for official business.

Visitor Category (Level 5 Vendor Access)

Vendor that will not be present on patient care units, is not a Direct or Indirect Patient Care Provider, will not come in contact with any patients or Meridian Direct or Indirect patient care providers; essentially acting as a "visitor" to the facility. Vendor relationship with Meridian requires regular, yet intermittent presence on site and are not in patient care areas. By way of example: electricians, plumbers, contracted hardware repair services, vending machine technicians, and vendors that perform demonstrations, training or educational programs.

Procedure:

1. Patient Contact Category Vendors* - Level 1 & Level access

The engagement process (RFP, contract review, proposal design/signature) shall include:

Completion of all requirements set forth in Vendor Requirements listed below.

Completion of requirements set forth in policy [Compliance Program Exclusion/Sanction Review Process, MH-COMPLY-006](#).

Orientation as required for team members as outlined in policy [Onboarding, MHS-HR-01-2211](#), policy '[Departmental Orientation, MHS-HR-01-2212](#)', and policy '[Agency Nurses: Requirements and Orientation, MH-NUR-ADM 0015](#)' or other requirements as defined in the contact for services or Statement of Work.

IMPORTANT NOTE: Departments which engage or interact with vendors who, with the exception of being involved in the delivery of patient care, fall into the direct patient care category are required to develop written policies and procedures governing orientation and sign in processes. This category may include but not be limited to External Case Managers, Service Professionals, such as Lactation or other counselors provided by the Department of Health or other such sources and Television Rental Staff.

2. Medical/Business Record Category

The engagement process shall include:

Adherence to vendor sign in procedures and ID card issuance set forth in Vendor Requirements listed in section #6 below.

Execution of a Non-Disclosure Agreement. Contact the Office of Legal Affairs to obtain an NDA when necessary.

At all times the vendor must be under the direct supervision of a Meridian Team Member involved in the

engagement of the vendor.

3. Law enforcement officers

Level 4 Vendor:

Shall follow processes as outlined in the Forensic Patient Policy and will receive and be responsible for adherence to guidelines in the Forensic Patient Booklet.

4. Visitor Category Vendor

Level 5 Vendor

The engagement process shall include:

Adherence to the vendor sign in procedures and ID card issuance as set forth in Vendor Requirements listed in section #6 below.

*** Meridian Health may establish additional requirements for vendors in areas determined to be high risk.**

C. Additional Vendor Requirements:

The following requirements **are in addition to those set forth in the Exhibit which is attached to this policy** and are applicable to all Meridian vendors, as set forth in detail below.

1. All sales representatives visiting a Meridian facility must sign in at the designated RepTrax kiosk. Kiosk locations for each Meridian facility are included on the vendor information website.
2. Sales Representatives must present proof of identification and a business card at designated security desk/RepTrax kiosk.
3. Sales representatives will be issued a RepTrax VENDOR identification badge, good for the date of issue ONLY.
 - The badge will indicate vendor company name, individual representative name, specific department the

representative is visiting, and the date.

- The badge must be displayed on the outer most garment, in clear view at all times while on the Meridian premises, except when in a sterile environment.

4. Representatives may not visit other areas of the hospital than those indicated on the badge. Repeat violation by the vendor will result in a type 3 infraction.
5. For sales representative to be present on a procedural unit, verbal permission is required by the physician performing the procedure. The business unit leader or designee must approve all requests for access of a sales representative to the procedural area / unit.
6. Any equipment brought into the hospital must be approved, inspected, and stickered by Biomedical Engineering.
7. The business unit leader or designee must validate the approval of all equipment/devices planned for use prior to the procedure. In addition, staff training & competency of such equipment/devices must be validated prior to use.
8. Sales representatives are restricted to accompany the specific physician(s) and procedure for which they have been scheduled. Representatives must NOT approach nursing and medical team members to promote their product(s) unless prior permission and arrangements have been made.
9. The delivery of all products must be made via the receiving dock. The hospital will only be liable for goods that are on a purchase order, consignment agreement, or as otherwise agreed to by Meridian.
10. All non-sterile instrumentation and implants being brought in for a procedure need to be in the facility a minimum of 24 hours prior to the procedure to allow for adequate processing and sterilization, and needs to be removed by end of that business day.

11. Policy Exhibit: Vendor Requirements. Attached to this policy are the health, background and other related clearance requirements for vendors which must be satisfied in accordance with the applicable Vendor Classifications in Section B of this policy.

D. EXCEPTIONS:

Exceptions to this policy will only be issued with the approval of the Meridian leaders or team members as set forth below and shall only be given in certain circumstances.

1. Manual Sign In—a Vendor will be permitted to visit a Meridian facility and sign in manually instead of through RepTrax ONE TIME ONLY so long as the leader of the area or department in which the Vendor is visiting approves of the manual sign-in process for that Vendor representative. Site materials managers will obtain a copy of the manual sign in for follow up.
2. Vaccination Status—exceptions related to vaccination status may be granted with the approval of the infection control manager and Vice President of Clinical Effectiveness at the Meridian facility the Vendor representative is visiting.
3. Other Exceptions—any other exceptions to this policy must be approved by the Senior Vice President Risk Management, Vice President Materials Management and the President of the Meridian hospital facility being visited or in the event the Meridian facility is not a hospital and does not have a president, the most senior member of administrative staff.
4. Any exceptions which are granted will be communicated in writing to Site Materials Management and Site Security and input into the Reprax system by the Director of Materials Management or his/her designee.

E. Enforcement of Vendor Requirements:

Type 1 infraction – First infraction of non-compliance with these Vendor Requirements will require detailed written explanation to the Site Materials Manager to include the details of the

infraction and understanding of expectations prior to next site visit.

Type 2 infraction – Second infraction of non-compliance within 120 days will result in denial of access to the facility for that vendor representative and will require a meeting with the vendor representative, their manager and Meridian’s Director, Corporate Materials Management.

Type 3 infraction – Third infraction of non –compliance within one year of the initial type 1 & 2 infraction will result in the vendor representative being banned from any Meridian facility.

F. **DEFINITIONS** for the purposes of this policy are as follows:

Confidential Information (Meridian Information)

Information that is considered sensitive business information and is created by or for Meridian Health or its subsidiaries and/or contractors, which includes any and all information related to present or former patients, team member records and information, ideas, inventions, donor information, cost and pricing information, confidential financial data, research data, strategic information, and information specifically marked as privileged or confidential. Confidential Information can be written and contained in a document, electronic and contained in a computer program or system, as well as spoken or oral. Refer to MHS-PRI-0037 Transmission Security Policy. **Publicly available information is not confidential information.**

Vendor/Vendor Representative

A third party contracted or otherwise permitted to perform a service on site at a Meridian Health facility, such as equipment technicians, valet parking staff, construction personnel, contracted service personnel, physician office employees, pharmaceutical representatives, and sales representatives.

Direct Patient Care Provider

A team member who provides treatment or other clinical care to patients as an essential function of their job, including but not limited to all categories of the Medical and Nursing Staff,

and Respiratory, Occupational and Physical Therapy Staff.

Indirect Patient Care Provider

A team member which has a presence in Patient Care Areas, but does not provide treatment or other clinical care and may interact with patients as an essential function of their job, including but not limited to building maintenance/engineering, food services, housekeeping, laboratory, pharmacy, sterilization services, Health Information Management staff, Biomedical device maintenance and calibration services.

Patient Care Areas

Areas where a patient is treated either/or directly such as a Medical/Surgical Unit, Intensive Care Unit or any other floor with patient rooms, beds or examining rooms as well as the corridors, meeting rooms and common areas contained therein, excluding areas accessible without thoroughfare through treatment areas.

Engagement Process

Process by which a vendor is chosen by Meridian team member to perform the services requested by Meridian. The process may include a request for proposal (“RFP”), a proposal, and a statement of work and/or a contract.

ATTACHMENT TO POLICY EXHIBIT: VENDOR REQUIREMENTS

MERIDIAN HEALTH SYSTEM, INC. (“MERIDIAN”)

The applicable Vendor requirements, set forth below must be satisfied prior to the commencement of services on site at a Meridian Facility. Please refer to the Engagement Requirements for Vendor policy to determine which of the below will be required for a particular Meridian engagement.

Vendor shall utilize REPTRAX in order to submit the documentation required by this Exhibit and related policy. Vendor understands that the costs of utilizing REPTRAX are borne solely by the Vendor. A Vendor’s

representative must be fully compliant in the REPTRAX system in order to obtain a visitor badge at a Meridian facility.

For the purposes of this Exhibit the term "VENDOR" shall include an individual vendor on its' behalf or a company/agency vendor on behalf of its' employees, agents or subcontractors.

- I. Criminal Background Check. VENDOR shall submit to a criminal background check.
 - Upon VENDOR's request MERIDIAN will conduct a criminal background check, provided that VENDOR shall pay to MERIDIAN the fee required for MERIDIAN to conduct the criminal background check and VENDOR shall send to MERIDIAN an authorization form for each employee/agent of VENDOR authorizing MERIDIAN to conduct a criminal background check that is completed and signed. OR
 - VENDOR may conduct a criminal background check by means of a third party and shall provide MERIDIAN with the documentation resulting from the completion of such criminal background check which shall include the following databases:
 - a. Social security traces/national background data
 - b. State-wide criminal search-New Jersey via the New Jersey State Police (NJSP) State Bureau of Identification System
 - c. Multi-state criminal searches
 - d. New Jersey county criminal searches
 - e. When applicable, out-of-country searches

- II. Background Verification. VENDOR shall submit to background verification for each employee/agent including the following:
 - a. Previous employment history prior to VENDOR'S engagement at MERIDIAN, and satisfactory references from previous employers as to clinical competency and reliability.
 - b. Proof of eligibility for employment in the United States of America (Form I-9 Employment Eligibility Verification).
 - c. Verification that VENDOR is free from Office of the

Inspector General sanctions and has no history of involvement in Medicare/Medicaid fraud.

- d. Verification of current and valid license and related certification, issued by the State of New Jersey or by the specific national licensing certifying board for the defined scope of his/her practice.
- e. Verification that VENDOR has had a minimum of one (1) full year's recent work experience in the current employee classification and within the specific clinical environment into which VENDOR is being hired.
- f. If travel is required as a function of the job, verification that VENDOR has a valid New Jersey driver's license.

III. Health Requirements. VENDOR shall provide the following:

- a. Health clearance form from a physician duly licensed in a jurisdiction within the United States of America, stating VENDOR is free from infectious disease, including respirator clearance where appropriate.
- b. Evidence of recent TB surveillance that meets NJDOH baseline assessment criteria;¹
- c. Evidence of immunity for Rubella, Rubeola, Varicella and Mumps;²
- d. Screening for Hepatitis B – HbsAg;
- e. Hepatitis B vaccination and post vaccination

¹ Tuberculosis screening shall consist of a baseline two-step Mantoux completed within a three week period with repeat annual one-step testing thereafter or laboratory result of an Interferon gamma release assay (IGRA) (QFT-GIT or T-Spot) baseline and annual IGRA testing thereafter. Individuals who have a history of being Mantoux or IGRA positive for tuberculosis must have an initial baseline negative 2 view chest X-Ray within the past 12 months and submit a TB questionnaire. Annual surveillance for Mantoux or IGRA positive individuals will be the completion of an annual TB questionnaire and review by a licensed HCP.

² Individuals susceptible to rubella, rubeola, mumps, and/or varicella are required to be immunized prior to their engagement at Meridian, unless they can prove "presumptive evidence of immunity" (documentation of past vaccination according to CDC guidelines or laboratory evidence of immunity).

- screening HbsAb;
- f. Annual Influenza vaccination prior to November 1st or evidence of exemption/mandatory masking per Meridian Health policy;³
- g. Substance Abuse Panel Drug Test approved and/or conducted by MERIDIAN.

IV. Orientation and Education Requirements. Each employee/agent of VENDOR shall:

- a. Participate in MERIDIAN's orientation program, Traditions or other training as designated by Meridian; and
- b. if applicable, take MERIDIAN's required written examinations, such requirements may be amended from time to time (NLN Medication, Annual Basic Training, EMTALA, Restraints, Age Specific, Patient Education, Domestic Violence, Elder Abuse, and any other educational material/review/testing as required by the specific position/assignment).

V. Job-Related Injury. In the event an employee/agent of VENDOR is injured on the job at MERIDIAN the following steps shall be taken.

- a. VENDOR shall:
 - (i) authorize Meridian Occupational Health to, at a minimum, provide initial treatment in one of the Meridian Occupational Health Sites.
 - (ii) prior to commencement of work assignment, provide MERIDIAN with the name, policy number and contact name of the VENDOR'S insurer for workers' compensation and a contact number for notification of on the job injuries. MERIDIAN will bill for services rendered in treating VENDOR for on the job injuries sustained at MERIDIAN. All follow-up care will be communicated to insurance carrier for authorization.
 - (iii) cooperate with all OSHA record keeping

³ Each individual's health status report shall include proof that the influenza vaccination was received prior to November 1st of the current year. If an individual cannot receive the flu vaccine, whether for religious or medical reasons, that person is required to properly wear a protective surgical mask over their mouth and nose when within 6 feet of any patient, when working with children or if working in sterile processing, peri-operative or medication preparation areas beginning November 1st of the current year through March 31st of the subsequent year in order to continue their engagement at Meridian.

- (iv) regulations, as set forth in 29 C.F.R. 1904. cooperate fully in tracking activities if VENDOR meets OSHA recording criteria.
- (v) comply with the MERIDIAN workers' compensation policy, prepare an Accident/Incident Report along with the MERIDIAN manager and be seen and directed by MERIDIAN'S Occupational Health Department.

- b. MERIDIAN shall be responsible to record injuries that meet the following criteria:
 - (i) death
 - (ii) days away from work
 - (iii) restricted work
 - (iv) transfer to another job
 - (v) medical treatment beyond first aid
 - (vi) loss of Consciousness
 - (vii) diagnosis of a significant injury or illness

- VI. Photo Identification.** VENDOR shall obtain picture "vendor identification" from MERIDIAN prior to providing services hereunder. VENDOR shall wear vendor identification at all times while on Meridian property.
- VII. Information Technology and Computer Use.** VENDOR shall comply with Meridian's Information Technology polices in connection with access to the Meridian computer system.
- VIII. Review of Policies.** VENDOR shall provide written acknowledgement that it received, reviewed and agreed to Meridian's policies and Corporate Code of Conduct.
- IX. Costs.** VENDOR is responsible for the cost of items in Sections I, II, and III. MERIDIAN shall provide the customized self-study/training outlined in Section IV(b). If VENDOR authorizes MERIDIAN to complete items I, II, or III, the VENDOR agrees to pay the requisite fees.
- X. Responsibilities after First Year.** Pursuant to MERIDIAN policy, if VENDOR is on location for more than one year, MERIDIAN shall require successful completion of MERIDIAN's annual basic training which shall be current and updated annually.