

UCLA Health System

Vendor Guide

Introduction

The UCLA Health System values the relationships with its vendors, and we have developed this Vendor Guide to provide vendor and sales representatives conducting business with us an explanation of some key guidelines to ensure a mutually professional relationship.

The objective of this guide is to provide vendors with information regarding key UCLA Health System policies, and to:

- Establish a uniform process for vendor representatives to access health system workforce members in order to solicit business;
- Ensure vendor representatives provide educational and technical support that contribute to positive clinical practice;
- Control and monitor vendor activity and assure appropriate vendor access to the Health System;
- Provide guidance for appropriate vendor behavior throughout the Health System; and,
- Ensure that all equipment and supply purchases, including new technology and pharmaceuticals, comply with all laws, and UCLA purchasing and contracting practices.

Vendor representatives should also be aware that access to the UCLA Health System is a privilege subject to adherence of these guidelines and failure to adhere to them may result in the termination of privileges of the company and/or individual involved.

Registration

We require that all vendor and sales representatives register with the UCLA Healthcare Purchasing Office prior to their first on-site visit in any of the UCLA Health System Hospitals and/or Clinics. All Pharmaceutical vendors are similarly required to register with the Pharmaceutical Services Administration Office. As part of the registration process, you will be provided with valuable information regarding our policies and procedures for protecting the confidentiality of our patient information, our policies for product selection, and our policies regarding conflict of interest and relationships with external business partners.

The Purchasing Office or Pharmaceutical Services Administration Office will provide each vendor representative with a registration form that must be presented each time you visit any one of the UCLA Health System hospitals or clinics. This includes physicians and staff located at:

- UCLA Medical Center
- Santa Monica UCLA Medical Center and Orthopedic Hospital
- Stewart and Lynda Resnick Neuropsychiatric Hospital
- UCLA Clinics in the Medical Plaza
- Community Practice Network Clinics

Visitation to the UCLA Facilities:

The UCLA Health System vendor representative policy is to monitor the activities of vendor representatives visiting the health system facilities, physicians and other workforce members. This policy is to insure that the workforce members have an adequate opportunity to conduct business with sales representatives and at the same time to minimize the interference of such action with normal operations.

These guidelines have been established for sales representatives when visiting the UCLA Health System facilities:

1. Sales representatives are allowed to visit members of the UCLA Health System clinical and administrative staff, by appointment only, Monday through Friday, 8:00 a.m. to 5:00 p.m.

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2. At the time of the visit, sales representatives must sign in at the Main Information Desks in the lobbies of the Medical Center(s). For visits to the UCLA Medical Plaza, sales representatives must sign in the Administrative Offices, Suite 202 in the 200 Medical Plaza Building. For visits to other clinical facilities, representatives are required to check in with the Information Desk in the applicable area.
3. Sales representatives will be required to show their Vendor Registration form obtained from the Purchasing Department or the Pharmacy Administration Office, and provide information on a "Sales Representatives Log" sheet including name, company name, phone number, name of person visiting, and arrival time. **Sales representatives must have an appointment and indicate the destination of their visit by name of Medical Center employee and telephone extension number.** Sales representatives will be issued a color coded ID badge which must be worn in a clearly visible location during the entire stay at the health system facility. This badge will be valid only for the day issued. In addition, sales representatives must wear their own company identification badge with their name and company clearly displayed.
4. Sales representatives are restricted to public areas of the Medical Centers and clinics and may access restricted areas only when authorized by a member of the health system staff. Public areas are defined as those areas which are provided for use to the general public, such as waiting areas and lobbies. Patient care, ancillary service areas and general conference room areas are not considered public areas. **Sales representatives may access the Medical Center cafeteria(s), but while there, are restricted from approaching UCLA staff members for the purpose of conducting business.**
5. Sales representatives must obtain approval from the UCLA Healthcare Purchasing Director prior to scheduling demonstrations or exhibits of medical/surgical supplies. Pharmaceutical representatives shall comply with UCLA Medical Center Policy No. 0013 (available in the Pharmacy Office) which outlines the proper procedures for the distribution of drug samples within the Medical Center. Pharmaceutical representatives shall not conduct pharmaceutical exhibits (i.e., "Drug Displays"). Laboratory supply representatives must obtain approval from the Clinical Laboratory Director prior to scheduling demonstrations or exhibits of devices or supplies used for laboratory testing.
6. The UCLA clinical areas have a limited number of telephones in the public areas. We request that sales representatives be considerate and refrain from using these telephones for extended business calls while patients and visitors are waiting. All phone communications must be completed away from patient care areas. Vendors should be sensitive to conducting extensive business calls in public areas.

The following additional procedures apply to specialized areas of the Health System:

PHARMACEUTICAL REPRESENTATIVES

Pharmaceutical representatives are not authorized to make direct, unsolicited contact with members of the medical staff or other Medical Center employees unless approval to do so is obtained from the Director of Pharmaceutical Services. All pharmaceutical sales representatives must register at the Drug Information Center (Room 16-131) on their initial visit. Thereafter, they will receive a copy of the policies and procedures relating to the activities of pharmaceutical representatives and receive a vendor information form ("Form"). The Form must be completed and returned to the Drug Information Center prior to any subsequent visits. It is the responsibility of the pharmaceutical representative to keep the vendor information form current.

MEDICAL/SURGICAL SUPPLY REPRESENTATIVES

Representatives must obtain approval from the Purchasing Department prior to marketing any new product to the Medical Center Purchasing Department. Representatives must obtain written approval from the Medical Center Product Standardization Committee or the Value Analysis Committee, and the appropriate Health System Department prior to testing, on a trial basis, any medical/surgical item or equipment. Any piece of equipment that is brought into the Medical Center for purposes of evaluation, demonstration, or loan must first be approved in writing by the Director of Clinical Engineering.

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PRODUCT AND/OR EQUIPMENT EVALUATION POLICY

Vendors wishing to place “no-charge” or loaner capital equipment in any UCLA Health System facility must have prior approval from the Purchasing Department. The Department which will be evaluating the instrument, product or equipment is responsible for completing an “Instrument/Product/Equipment Evaluation form” and submitting the form to the Value Analysis Coordinator or designated Procurement Coordinator in the Purchasing department, at least four (4) weeks prior to the anticipated date of the evaluation.

The Department requesting the evaluation will need to provide the following information with the approval request:

- Vendor quote to include by line-item: Product description, Cat#, Purchase UOM, list price, discounted price and price protection end date;
- If capital equipment is part of the evaluation, vendor will provide equipment specifications and proof of Medical/Dental U.L. approval;
- Brochure or catalog pictures with product numbers;
- Written sterilization instructions (if applicable); and,
- Copy of FDA 510k or PMA Approval (required).

Note: If the equipment acquisition cost or the annual consumable supply expense exceeds \$50,000, any final acquisition, if approved, must adhere to the University of California competitive bid or sole source justification policies.

At the conclusion of the evaluation period, it is the department requesting the evaluation will need to provide a written evaluation of the product to the Value Analysis Coordinator.

LABORATORY SUPPLY REPRESENTATIVES

Laboratory supply sales representatives are responsible for obtaining written approval from the Clinical Laboratory Director prior to marketing any new products, laboratory instruments, reagents or test kits. All laboratory product samples must be reviewed by the Clinical Laboratory Director or his designee prior to introduction to the medical or nursing staff.

OPERATING ROOM SERVICE SUPPLY REPRESENTATIVES

Operating Room Services supply sales representatives must first register with the Purchasing Department, and must sign in at the Main Information Desk in the applicable Medical Center at each visit before proceeding to the Operating Room Services (MAIN OR, JSEI OR, and Outpatient Procedure Areas) check-in area. Sales representatives must have an invitation or an appointment and are required to display the appropriate company identification badge. Sales representatives receiving permission to access the Operating Room Services area may not access other departments in the Medical Centers without following the procedures outlined for those departments.

Patient Privacy

UCLA is firmly committed to protecting the privacy of our patients. Individuals who are not involved in the care of the patient will not be allowed to be present without the patient’s consent while the patient is being examined or otherwise treated.

The presence of device vendor representatives present in a clinical area such as an Operating Room or Procedure Room to assist with device implantation, testing or settings will be listed as part of the treatment team in the Operating Room log maintained in the patient’s medical record, and must be identified on the Surgical Informed Consent form.

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Conflict of Interest Policies

The UCLA Health System has a comprehensive, values-based Code of Conduct, which is a vital part of the way we conduct ourselves and our business relationships. Our mission is to deliver the highest quality medical care to our patients, to be the leader in biomedical research, and to train health care practitioners and leaders of the future. We strive to act with absolute integrity in the way we work.

The UCLA Health System has a Conflict of Interest policy which governs the actions of our staff and faculty in their relationships with third parties. UCLA Health System employees are also subject to the California Political Reform Act of 1974, and must follow University of California Conflict of Interest policies as well.

No employee including faculty will accept payments in cash or cash equivalents, except as compensation for bona fide services as allowed by University policy.

It is the expectation of UCLA Health System that Pharmaceutical and other vendors will adhere to principles outlined in the ***PhRMA Code on Interactions with Healthcare Professionals and the AMA Ethical Guidelines on Gifts to Physicians from Industry***. During the course of a contract, vendor representatives may be requested to disclose existing financial relationships with UCLA Faculty and staff.

Key elements of the UCLA Health System conflict of interest policy are as follows:

1. **Gifts** All gifts (zero dollar limit), free meals, payment for time for travel to or time at meetings, and payment for participation in online CME from drug and medical device companies to physicians are prohibited.
2. **Pharmaceutical Samples** The direct provision of pharmaceutical samples to physicians are still allowed; however, all samples must be provided in accordance with the Drug Sample Policy for UCLA Health System, HS Policy No. 1307 (<http://www.mednet.ucla.edu/Policies/pdf/enterprise/HS1307.pdf>).
3. **Drug Formularies** Hospital and medical group formulary committees and subcommittees overseeing purchases of medical devices exclude physicians (and all healthcare professionals) with financial relationships with drug manufacturers, including those who receive any gift, inducement, grant or contract.
4. **Continuing Medical Education.** Vendors cannot provide support directly or indirectly through a subsidiary agency. Manufacturers wishing to support education for medical students, residents, and/or practicing physicians must contribute to a central repository, which in turn will disburse funds to approved programs.
5. **Funds for Physician Travel** Pharmaceutical and device vendors interested in having faculty or fellows attend meetings must provide grants to a central office which will then disburse funds to faculty and training program directors.
6. **Speakers Bureaus and Ghostwriting.** Faculty, staff, and trainees always should strive, however, to ensure that their talks or public presentations are free of any commercial influence. In addition, they need to consider whether an industry-sponsored activity creates an appearance of impropriety and strive to avoid any activity that may create the appearance of a conflict of interest. Transparency and disclosure are an essential factor when participating in these programs. A lecturer is solely responsible for the content of his or her lecture and should not delegate creation of the content of slides or other educational materials to industry sponsors.
7. **Consulting and Research Contracts.** Consulting or honoraria for speaking must take place with an explicit contract with specific deliverables, and the deliverables should be restricted to scientific issues, not marketing efforts. "No strings attached" grants or gifts to individual researchers are prohibited. Grants for support of general research can be accepted by our Central Research Office to support general research, provided the funds are not designated for use by specified individuals. To better ensure independence, scientific integrity, and full transparency, consulting agreements and unconditional grants are posted on (a publicly accessible internet site).

If you have any questions about the UCLA Healthcare Conflict of Interest policy, please contact the UCLA Health System Compliance Office at 310-825-7135. We hope that this leaflet is informative and helps you understand how to do business with the UCLA Health System. If you have any additional questions or comments, please call the UCLA Healthcare Purchasing Department at 310-794-3620.

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Contact Information

Purchasing Director	310-794-3620
Pharmacy Director	310-825-7101
Office of General Counsel	310-794-3138
Chief Compliance and Privacy Officer	310-825-7166
Laboratory Director	310-206-4003
CME Office	310-794-1958
Research Grants Office	310-794-2642