Policy Title: Supply Chain Vendor Sales Representative Access and Credentialing Policy	**Last Review Date:** 07/29/2025
Policy Number: 1070	**Next Review Date:** 07/29/2028

Policy Title: Supply Chain Vendor Sales Representative Access and Credentialing Policy

Origination Date: 10/01/2009
Key Words: FH-SC.003
Supersedes: FH-SC.003
Owner's Title; Department: Director Supply Chain Systems; Supply Chain

Applies to:

☐ North Region Froedtert ThedaCare Health, Inc.

☒ South Region Froedtert ThedaCare Health, Inc. – Only check if applies to ALL entities below

Or only to the South Region entities checked -

Hospitals	Physician Practices	ASCs	Other
☐ FCH ☐ FHFMH ☐ FMFH ☐ FMLH ☐ FWBH	☐ CP ☐ NEMG	☐ DTSSC ☐ FSC ☐ MFASC ☐ WBSC	☐ FH Pharmacy Solutions ☐ Inception Health ☐ Workforce Health ☐ _____

I. Scope

A. The Supply Chain Vendor Sales Representative Access and Credentialing Policy ("Policy") establishes the standards and processes for Sales Representative access and credentialing and applies to all locations in the Froedtert ThedaCare Health, Inc. Southern Region ("Froedtert").

II. Purpose Statement

A. Monitor and control Vendor Sales Representative access and credentialing at all Froedtert facilities.
B. This Policy establishes:
   1. Requirements to monitor and control Vendor Sales Representatives' access at all Froedtert owned, leased, and operated sites.
   2. Standards for efficient and safe interactions between our Vendor community and Froedtert staff.

3. Definitions for ownership and accountability related to managing Vendor access to Froedtert.
4. Clear guidelines for the use of the Vendor Credentialing System (VCS) at Froedtert.

C. The inconsistent application of Vendor management processes across Froedtert facilities can lead to possible liability concerns, compliance, integrity, and fairness issues. Healthcare industry accrediting organizations require contracted labor and services in accredited facilities to be managed just as the facility would manage direct employees, including verification of all relevant human resource information. Further, such accrediting organizations through their standards require accredited facilities to manage safety and security risks, including the identification, as appropriate, of all patients, staff, and other people at the facility.

III. Definitions

A. **Approved Automated Requisition System:** TrackCore SameDay

B. **Contract Labor and Collaborative Partners:** Refers to individual contracted either directly or indirectly through a Vendor by Froedtert to perform a specific job duty or task (e.g., consulting, training, project work, service, maintenance, etc.) on a routine and regular basis in any Patient Care Areas accredited by an accrediting or standard organization. This would include contracted collaborative partners that work with Froedtert staff in areas of medical research, scientific advancement, and protocol development. Contract Labor and Collaborative Partners are not subject to this Policy as stated in Policy Exceptions A.4. and A.5. below if certain conditions are met. If those conditions are not met, it is the intent of this Policy that Contract Labor and Collaborative Partners will generally fall within the definition of a Vendor Sales Representative and will be subject to this Policy.

C. **Patient Care Area**: Any area within any Froedtert facilities where it would be normal that patients be present. This includes, but is not limited to, patient care and procedure rooms, waiting areas, patient elevators and walkways and provider offices.

D. **Vendor Sales Representative:** Refers to personnel who represent a company or companies in any Patient Care Area or sale/market any patient care supplies, equipment or services to Froedtert. Vendor Sales Representatives include all categories of supplies, services and equipment, e.g., medical-surgical, pharmaceuticals, laboratory, information technology, capital equipment, office products, etc.

E. **Vendor Credentialing System (VCS):** Any one of several platforms used to vet and approve Vendors and their Representatives. To learn about the current platform(s) used at Froedtert, please go to For Our Suppliers | Froedtert & MCW.

(https://www.froedtert.com/suppliers.

IV. Policy

Policy Exceptions

A. The following individuals and groups are not subject to this Policy unless they visit Froedtert facilities at least once per week. Such individuals are classified as "regularly on site" and must comply with this Policy.
   1. Individuals representing governmental or regulatory agencies, business audit services such as insurance or financial auditors; study monitors under a clinical trial agreement; clinical service agencies such as home health and/or hospice agencies; or guests participating in a tour that does not involve sales and marketing.
   2. Executive/corporate management from companies visiting a Froedtert entity for purposes of a meeting as long as all of the following criteria are met:
      a. Any Vendor Sales Representative with responsibility for the Froedtert account in attendance has registered in the VCS;
      b. The meeting is for the primary purpose of a strategic alliance, new business development discussions or scientific exchange with key Froedtert physician / administrative leaders;
      c. The meeting is at the request or agreement of a member of the Froedtert administrative staff, physician, scientist or administrator and such Froedtert personnel accompany and participate in the meeting;
      d. The meeting is conducted in a conference room or private office, preferably in a non-Patient Care Area.
   3. Principals/employees of management consulting firms visiting a Froedtert entity for purposes of a meeting are exempt only for the first on site meeting, and any subsequent meetings in non-Patient Care Areas.
   4. Contract Labor and Collaborative Partners when a written agreement exists specifying the level of credentialing necessary in order to meet accrediting organization's standards and adhere to Froedtert's Code of Business Conduct. Contract Labor and Collaborative Partner Representatives may be issued a long- term badge and managed through the Contractor Compliance system, Froedtert Security, and Froedtert Human Resources (HR) practices.
   5. Representatives from contracted Vendors who do not have regular contact with patients or patient equipment such as delivery services, couriers, and facility maintenance staff unless they are regularly on site. If Representatives from these

contracted Vendors do have regular contact with patients or regular access to Patient Care Areas, they will be considered Contract Labor or a Collaborative Partner as defined in Policy Exceptions A.4. above.

Additional Policy Statements

B. Froedtert will develop processes for Vendor Sales Representative access and privileges that comply with the following requirements: Minimize disruption to the clinical practice, establish and maintain product and equipment quality, and promote standardization through compliance with contractual commitments.
C. Vendor Sales Representatives are expected to follow a prescribed set of guidelines for conducting business with Froedtert. Failure to follow our guidelines will result in an inability to visit our facilities when acting in a sales capacity.
D. Staff of Froedtert facilities will help monitor sales visits and behavior by sales personnel. Staff should report Vendor Sales Representatives who have failed to follow our prescribed process and guidelines to the Supply Chain Department, so that appropriate follow up and/or corrective action can be taken.

V. Procedure

A. Supply Chain partners with Security, HR, Occupational Health, Infection Prevention and Control, Enterprise Facilities Services management, and other appropriate departments to promote appropriate access management.
B. Supply Chain designates responsible personnel and locations through Froedtert as check-in points for Vendor Sales Representatives and issuance of Vendor badges.
C. Representatives are not allowed in any Froedtert facility or site without a valid pre-scheduled appointment. “Drop-ins” and “cold calls” are not welcome.
D. Representatives are required to wear VCS badge during the entirety of their time at Froedtert locations. If Representatives forget their VCS badge, they must use the VCS kiosks to print an access badge, to be worn above their waist, during their visit. Representatives that forget their VCS badge at an ASC location must use the app-based check in process.
E. Credential requirements will be determined by the following departments: Supply Chain, Infection Prevention and Control, Risk Management, Safety and Security, and Occupational Health and Wellness.
F. As part of the registration process, the Vendor Sales Representative will present all required information including but not limited to:
    1. A valid photo ID

2. Reasonable documentation of relevant competencies, training and/or qualifications
3. General safety training
4. Patient confidentiality
5. Immunization records
6. Conflict of interest forms
7. Background checks

G. All Vendors who may have access to Protected Health Information ("PHI") as defined by HIPAA must have a current Business Associate Agreement (BAA) on file, or have signed a Froedtert Confidentiality agreement as deemed appropriate.

H. Vendor Sales Representatives will also be required to confirm receipt and understanding of relevant documents, policies and procedures.

I. Vendor Sales Representatives who will be visiting or working within a Patient Care Area as a technical advisor, must follow additional requirements to protect the health and safety of staff, patients and others:
   1. Written proof of the Vendor Sales Representative's current status pertaining to TB testing, hepatitis vaccination, MMR (measles, mumps, and rubella) vaccination, and chicken pox vaccination.
   2. Documented evidence of training and competencies on the following topics: infection control and aseptic practices, blood-borne pathogens, patient rights, confidentiality, HIPAA, informed patient consent, product compliance and medical system, device, product, procedure or service they will be delivering and/or operating.
   3. Comprehensive processes to govern the admission and presence of Vendor Sales Representatives in any operating rooms and/or procedural areas. This will include the ability to clearly identify any Vendor Sales Representatives in such procedural areas.

J. Vendor Sales Representative's services to physicians and clinical staff providers during surgical, interventional and diagnostic procedures will be restricted to observation and verbal consultation only.

K. Vendor Sales Representatives may only visit specific departments/areas where they have a confirmed appointment.

L. General ID Processes: Vendor Sales Representatives may use one of the following types of badges to access a Froedtert site: A VCS printed badge or a digital badge.
   1. All types of badges will clearly identify the wearer as a Vendor (versus a staff member or other Froedtert staff).

2. All badge types must be displayed above the waist.
3. VCS issued badge.
4. VCS printed badges will only be valid for the day they are printed and will clearly display the date for which it is valid.
5. Digital badges will be presented daily at the entrance point to a location. Vendors using digital badges for access must wear a badge identifying themselves and their company for the duration of their visit.

M. At all acute facilities, VCS badges and VCS printed badges may be used. Digital badges are not acceptable.
N. At non-acute facilities, a Vendor Sales Representative may use all types of badges listed above.
O. Vendor Sales Representatives who have not checked-in and/or are not visibly displaying a valid ID or access approval are not allowed into a Froedtert facility and will be referred to the Supply Chain Department.
P. All Froedtert staff will communicate the existence and enforcement of this Policy and requirements to materials management personnel, facility staff and to potential Vendors.

Surgery Department Specific Guidelines

Q. When visiting any Froedtert Surgery Department, Vendor Sales Representatives must have a pre-authorized appointment (per Procedure C. above) and comply with the following guidelines. Failure to comply will result in suspension or permanent revocation of sales privileges at all Froedtert facilities.
   1. Representatives must not access to the surgery schedule or patient scheduling. Representatives also must not procure information from a patient's chart.
   2. While in the Surgery Department, Representatives will not approach and/or solicit other physicians or attempt to attend procedures for which they have not previously been cleared.
   3. Representatives must not use the operating room for sales calls.
   4. Samples must not be provided directly to staff, physicians or patients. All new products must follow the established Value Analysis practices of Froedtert.
   5. Representatives found to be "counter-selling" our reprocessing efforts will be suspended for a period not less than 3 months.
   6. All products presented for use in the Surgery Department must be FDA approved.
   7. In the event a surgeon contacts a sales or manufacturing Representative directly for a product(s) to be used in the Surgery Department, the sales or manufacturing

Representative will present the product(s) to the Surgery Buyer/Inventory Specialist upon entering the Surgery Department. List price and discounted pricing information is required. Froedtert will not pay list price for any product utilized in the Surgery Department.

8. Representatives must contact the Supply Chain Department to initiate or modify a consignment program.
9. If a product(s) is brought into the Surgery Department without a purchase order being issued in advance, Froedtert considers whatever is brought in a "donation."
10. Notification of implant items must be submitted through the Approved Automated Requisition System or via email to the Surgery Inventory Specialist at FMLH or the OR Buyers at FMFH.
11. Items that process through the Approved Automated Requisition System will be entered and/or verified onto a proposed bill sheet by the Vendor Sales Representative within two business days from the time of notification. It is the expectation of Froedtert that any discrepancies identified by the Supplier after the Purchase Order is issued will be resolved within 30 days from the date of the case. If the Vendor fails to correct an issue that is not identified until after the Purchase Order is released it is at the discretion of Froedtert as to whether any adjustments will occur.
12. Safety inspection of all electrical and battery operated equipment must be completed by the BioMed Department before being brought to the Surgery Department. BioMed requires a minimum of 48 hours (excluding weekends) to complete all safety testing.
13. Non-electrical equipment, instruments, instrument sets, and reusable items must arrive no later than 48 hours before a scheduled procedure to assure they are processed correctly for our patients.
14. All sets currently not in inventory must be accompanied by an electronic file supplied to the appropriate Service Coordinator. This file should be in Microsoft Excel format. This file must include: Set Name; Instructions for use (IFU); Manufacturer name; Rep's name, phone number, and e-mail address; Catalog number; Order number; Item name; Quantity of each item; Price of each item; Packaging; Type (implant, instrument, consumable); and HCPCS Level II code (required for any implant). If there are multiple pans, Vendor must indicate pan number and total number (i.e. Pan 1 of 3). Additionally, each pan must be itemized and, if layered, noted as to upper/middle/lower, and the sequence of items within the tray (i.e. left to right, bottom to top). Vendors may use the file template provided by

the hospital, or one from their company, so long as it contains the required information.

15. Deliver sets to the Decontamination Area of the Sterile Processing Department (SPD). All sets are sterilized upon arrival to our institution.
16. A Vendor Notification Form must accompany any items being brought into the facility and delivered to SPD.
17. Representatives must be on site and readily available for those cases involving new sets or seldom used sets. Exclusions to this are by surgeon discretion only.
18. Once a set/tray has been used and decontaminated, Representative must remove it from the hospital within 48 hours, unless it will be used for a subsequent posted case.
19. Representatives will play no role in diagnosis and treatment of a patient. Representatives are to limit their comments and advice to the use and performance of the product(s) and will avoid making unsolicited statements or suggestions of alternative approaches.
20. Representatives are not allowed to scrub for surgery, enter the sterile field, or have direct physical contact with our patients.
21. In the event of an emergency or code, Representatives are asked to leave immediately. Representatives must follow the direction provided by our Froedtert staff members at all times.
22. Representatives must comply with the Surgical Attire Policy of the institution.
23. Representatives are required to follow the direction of the Surgery Department Circulating RN while in the operating room suite.
24. Representatives must also adhere to universal precautions (wearing protective eyewear, hand washing, etc.).
25. Representatives must not bring backpacks or other bags into operating room suites.

Pharmacy Guidelines

R. Froedtert and the Medical College of Wisconsin does not utilize pharmaceutical Representatives for patient and staff education purposes or for presentation of pharmaceutical or disease state information at Pharmacy and Therapeutics (P&T) Committee or Subcommittee meetings. Our clinics, physicians, and P&T governance utilizes the Froedtert Pharmacy Department for any and all pharmaceutical education and information needs. For special circumstances or needs, pharmaceutical Representatives are contacted by invitation. All clinical information, health economics outcomes research data, utilization questions, or contracting matters must be routed

through Froedtert's Center for Medication Utilization or Pharmacy Contracts and Purchasing Coordinator.

Enforcement

S. This Policy is administered through the Froedtert Supply Chain Department in partnership, collaboration and cooperation with Froedtert Executive Leadership, and all Froedtert staff members and students. Direct Comments, questions, and violations to the Supply Chain Department. The Supply Chain Department will work with the Froedtert Compliance Department and site-specific Safety and Security Departments to enforce this Policy.

T. Non-compliance or non-support of this Policy by a Froedtert staff member may result in corrective action.

U. Non-compliance by Vendor Sales Representative with Froedtert policies will result in, but not be limited to, the following actions:
   1. First Infraction: A Supply Chain Director or their designee will contact the Vendor Sales Representative to review an incident and possible future actions if infractions continue.
   2. Second Infraction: There will be a suspension of the Vendor Sales Representative's privileges at the facility for a period up to three months, with a formal notification to the Representative's supervisor. Current business will be conducted by an alternative Representative from the company.
   3. Third Infraction: There will be a suspension of the Vendor Sales Representative's access and privileges at all Froedtert facilities indefinitely, with formal notification to the Representative's supervisor.

V. Froedtert reserves the right to suspend or permanently revoke any Vendor Sales Representative's ability to call upon our health system if the circumstances have been determined to be of a serious nature. Violations of a serious nature may also result in an escalation of the suspension and/or revocation process.

W. As a final option, Froedtert may terminate an agreement and convert to an appropriate, competitive and acceptable product. Grievances may be filed with the VP of Supply Chain, the Chief Pharmacy Officer, or the Corporate Compliance Officer.

Questions / Concerns

X. Please direct questions or concerns regarding this Policy to Froedtert Supply Chain Department at 262-532-5350.

Y. Pharmacy related questions or concerns, may be addressed to: CMU@froedtert.com

VI. Related Information

A. HR Corrective Action Policy

B. HR Solicitation and Distribution Policy

VII. Statements

A. None

VIII. References

A. None

IX. Attachments

A. None