



# Cleveland Clinic

Supply Chain, Support Services and Protective Services

## Non-Employee Visitation and Onboarding Standard Operating Procedure

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## Purpose

This standard operating procedure establishes uniform guidelines and onboarding requirements for Supplier Representatives, including: non-employees, vendors, students, volunteers, contractors, construction workers, affiliated medical professionals, observers, etc., who require access to Cleveland Clinic (CC) networks or facilities including: Cleveland Clinic patient care areas (defined as any area that an individual will or may come into contact and/or in the same vicinity with patients of Cleveland Clinic such as hospitals, family health centers, ambulatory surgery centers, physician offices, etc.), administrative buildings, new construction sites, servers, applications, etc. Adherence to this standard operating procedure safeguards proper Supplier Representative vetting and orientation prior to assignment at Cleveland Clinic via a third party and ensures reasonable control and identification of Supplier Representatives to maintain a safe environment for our patients, caregivers, visitors and infrastructure.

This standard operating procedure is applicable to all Cleveland Clinic health system locations, and mandates a centralized system for housing compliance elements in Protective Services in the event of an audit.

Supplier Representatives can play an important role in patient care and the operation of Cleveland Clinic assets and are permitted to be present in Cleveland Clinic (CC) facilities or have access to our network and applications at the request of an appropriate caregiver. To ensure safety for our patients and caregivers, Security Administrative Services maintains a standardized onboarding process for all Cleveland Clinic health system locations prior to assignment.

## Definitions

**Cleveland Clinic United States locations** - Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children’s Hospital for Rehabilitation, Cleveland Clinic Florida, Cleveland Clinic Hospital (Weston), Coral Springs Ambulatory Surgery Center, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Cleveland Clinic Personnel and Facilities** – All personnel, whether employed, contracted or affiliated with Cleveland Clinic, including all physicians, health care providers and students of Cleveland Clinic. Cleveland Clinic facilities are defined as all facilities and respective campuses and regional hospitals, whether owned, leased, rented or controlled by Cleveland Clinic.

**Supplier** – Manufacturers, suppliers, distributors, or providers of products, equipment or services, whether medical or non-medical.

**Vendor Representative(s)** – Any individual who visits Cleveland Clinic for the purpose of soliciting, marketing or distributing information regarding the use of products or services.

**Non-Employee:** individuals who need access to Cleveland Clinic property who do not receive a pay check with a Cleveland Clinic logo on it. Examples are students, contractors, observers, etc.

**Remote Access Users:** An individual who requires access to Cleveland Clinic systems in order to deliver on scope of work or service level agreement.

**Department Representative:** The Cleveland Clinic employee who is authorizing the non-employee to be on Cleveland Clinic property. The Department Representative is responsible for the non-employee while they are on Cleveland Clinic property.

**Patient Care Area:** An area that an individual will or may come into contact and/or in the same vicinity with patients of the Cleveland Clinic. Tuberculosis (TB) tests are required for all non-employee whose primary work location is in a patient care area.

**Weapon:** Any device that could be carried, possessed or used for the purpose of inflicting physical harm.

**Occurrence:** a visit to Cleveland Clinic property, regardless of the number of hour’s onsite.

## Instructions

All non-employees on Cleveland Clinic property must be on boarded/badged through an approved method.

Please use the matrix below to determine if a supplier representative shall be on boarded through the non-employee (i.e. SilkRoad) or Vendor (i.e. Vendormate) process. See below for potential exceptions.

	<b>Non-Employee</b>	<b>Vendor</b>
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<b>System Utilized</b>	SilkRoad	Vendormate/GHX
<b>Role</b>	Contractors, construction workers, observers, couriers, visiting researchers, students, volunteers	Any individual who visits Cleveland Clinic for the purpose of soliciting, marketing or distributing information regarding the use of products or services.
<b>Location</b>	In clinical/non-clinical areas, patient facing, or a patient care facility (see definition above)	In non-clinical areas (meeting with Supply Chain, physician offices, repairing equipment, etc.) or clinical areas for product trials
<b>Compliance Requirements</b>	Tuberculosis test, flu shot (seasonally), online compliance courses (i.e MyLearning) (annually), and background check	
<b>Background Test Facilitator</b>	Cleveland Clinic background check	GHX background check
<b>Badge Type</b>	Hard badge	Sticky badge
<b>Badge Expiration</b>	One year, unless otherwise approved	A new badge must be printed for each visit upon check in. Sign out mandatory.
<b>Initiate Process</b>	Cleveland Clinic personnel submits Onboarding Request Form or Event Coordinator initiates	Sales representative registers in credentialing software (i.e. Vendormate/GHX)
<b>Approval</b>	Cleveland Clinic personnel authorizes non-employee prior to start date	Scheduled appointment with Cleveland Clinic personnel required for every visit

Orientations are the responsibility of the department representative.

If you have any questions please reach out to onboarding support at [nonemployeeonboarding@ccf.org](mailto:nonemployeeonboarding@ccf.org) or by phone at 216.448.0082.

**Potential Exceptions to the onboarding/badging process:**

- Supplier representatives on site for a ‘vendor fair’
- Supplier representatives meeting with Executive level
- Supplier representatives demoing a product not in a patient care area
- Supplier representatives participating in a Request for Information ( RFI) or Request for Proposal (RFP)

Non-employees without a badge must be escorted by personnel within the department hosting the experience and sign a confidentiality agreement. In order to obtain a confidentiality agreement please reach out to your Supply Chain representative. On boarded / badged construction workers are permitted to be on the job site unescorted due to the nature of work performed. Otherwise, local non-badged, non-employees must coordinate with local Facility Manager prior to coming onsite.

**Onboarding Program for Non-Employees**

Protective Services manages the non-employee onboarding process and maintains all compliance documentation. Each non-employee is required to complete the onboarding process

prior to arrival on Cleveland Clinic property and prior to badge expiration date. All users must adhere to the Security Administrative Services guidelines regarding program access.

All non-employees are responsible for completing the tasks that have been assigned to them as outlined in the Conditions of Use. Violations of the Conditions of Use will be investigated.

Protective Services reserves the right to audit any information submitted to the program with academic institutions or external entities. Upon request of a document, it must be provided to Security Administrative Services within 24 hours.

Data entered into the program is protected by the software provider. The Cleveland Clinic protects the confidentiality, integrity, and availability of all data that it receives, maintains, or transmits.

Security Administrative Services has ultimate program oversight and can inactivate the onboarding process.

Security Administrative Services will report all policy violations to the department representative/sponsor and the contracted leadership.

### **Non-employee Badging**

All non-employee representatives who will be on Cleveland Clinic property in a patient or clinical area, must obtain, display, and renew valid identification badges through the ID Badge Department within Protective Services. The onboarding requirements will be completed prior to receiving an active badge and include the following, or variations of the following:

1. Submit basic information such as name, email, Social Security Number (SSN), Date of Birth (DOB), address used to populate the badge system
2. Complete a background release form
3. Complete a confidentiality agreement
4. Acknowledge Conditions of Use
5. Submit verification of negative TB test if necessary
6. Read and acknowledge enterprise-wide policies
7. Complete online compliance courses (i.e. MyLearning)
8. Register their vehicle for parking
9. Flu shot compliance
10. Department-specific requirements

Requirements are subject to change at any time based on needs of stakeholders, departments,

the Cleveland Clinic enterprise, or government regulations. All Cleveland Clinic employees who have oversight of non-employees, contracted companies, affiliated colleges and universities, will adhere to the onboarding process Cleveland Clinic requires as outlined within this standard operating procedure.

### **Non-Employee Departure**

All Cleveland Clinic badge holders must return to the Badging Office upon departure.

It is the department representative's responsibility to communicate to Security Administrative Services when the non-employee no longer requires access to Cleveland Clinic property.

Individuals found to be non-compliant are subject to removal from the property.

## **Onboarding Program for Vendor Representatives**

Protective Services manages the supplier/vendor representative's onboarding process and maintains all compliance documentation. Each representative is required to complete the onboarding process prior to arrival on Cleveland Clinic property.

Security Administrative Services has ultimate program oversight and can inactivate the onboarding process.

Security Administrative Services will report all policy violations to the department representative/sponsor and the contracted leadership.

### **Vendor Representative Badging**

All Vendor Representatives determined who will be on Cleveland Clinic property in a patient or clinical area, must obtain, display, and renew valid identification through Protective Services. The onboarding requirements will be completed prior to entering a patient area and include the following, or variations of the following:

1. Submit basic information such as name, email, Social Security Number (SSN), Date of Birth (DOB) to the vendor credentialing software (i.e. GHX/Vendormate)
2. Complete a background release form
3. Complete a confidentiality agreement
4. Acknowledge Conditions of Use
5. Submit verification of negative TB test if necessary
6. Read and acknowledge enterprise-wide policies
7. Complete online compliance courses (i.e. MyLearning)
8. Flu shot compliance
9. Department-specific requirements (signing in and out of area)

Requirements are subject to change at any time based on needs of stakeholders, departments, the Cleveland Clinic enterprise, or government regulations. All Cleveland Clinic employees who have oversight of representatives, contracted companies, will adhere to the onboarding process Cleveland Clinic requires as outlined within this standard operating procedure.

### **Visitations:**

- A Vendor Representatives must have a badge showing on their person at all time on Cleveland Clinic property. If a Vendor Representative is on Cleveland Clinic property and does not have a badge they are required to sign a Non-Disclosure Agreement (NDA) and be accompanied by a Cleveland Clinic employee at all times.
  - If a Vendor Representative is seen without a badge in a clinical area call Protective Services immediately.
- Vendor representatives are required to have an appointment, sign-in and sign-out via credentialing software (i.e. GHX/Vendormate) for all visits. Visitation hours must be consistent with normal hours of operation for Cleveland Clinic unless requested by department employee.
  - Non-contracted vendors require Physician authorization prior to entering into any clinical space.
- Vendor Representative may be present in a patient care area when needed for treatment, payment, or health care operation purposes, for example, providing the support necessary for a physician to utilize the product or device safely or education/training.
  - A HIPAA authorization is required when the Vendor Representative's presence in the patient care area is not for treatment, payment, or health care operations purposes. (See [HIPAA Authorization Policy No. 2066](#) and [HIPAA Privacy Glossary Policy](#) for additional information.)
- When such an authorization is required, prior to the admission of the Vendor Representative into the patient care area, a clinical caregiver must verify that the patient's authorization concerning the Vendor Representative's presence has been obtained and documented in the patient's medical record.
- Vendor Representatives are not permitted to move freely about in areas not pertaining to their specific visit, including but not limited to staff break rooms, other operating suites or physician offices. Unannounced visits and soliciting of promotional activities by Vendor Representatives are strictly prohibited.
- When in any clinical space under no circumstances will a Vendor Representative be permitted to:
  - Participate in hands-on delivery of patient care (e.g. scrub)
  - Provide initial training of equipment and/or supplies during a procedure
- Vendor Representatives are required to wear orange scrubs during all participation or observation of a clinical procedure at Cleveland Clinic's main campus.
  - This scrub color is specific to vendor representatives and is designed to ensure easy identification.

- When leaving the surgical or procedure rooms, Vendor Representatives must cover their scrubs with a white, buttoned lab coat while inside the hospital
- This attire cannot be worn when traveling to and from work. Vendor Representatives must completely change out of their scrubs with or without a lab coat before leaving the premises.
- If the Vendor Representatives do not comply with these previously stated guidelines they may risk the loss of privileges in clinical areas and all other Cleveland Clinic facilities.
- For all other Cleveland Clinic facilities, the specific location will provide the Vendor Representative with their scrubs.

### **Contracting and Sales:**

- Vendor representatives may only discuss price, or negotiation of price, and/or contract with Supply Chain & Support Services. Under no circumstances shall the Vendor Representative solicit new products and/or technology improvements, services, or contracts in hospital areas other than with Supply Chain & Support Services.
- Cleveland Clinic reserves the right to refuse to pay for any product or service not authorized by Supply Chain Management or the specific department. Contracts must be approved by Supply Chain Management prior to execution. A contract signed by anyone other than an officer, or their delegate, of the respective corporation is not valid.
- Vendor Representatives are not permitted to provide anything of value to a Cleveland Clinic employee that could influence or be perceived as influencing the judgment of the employee in the execution of his/her duties. To this end, no gifts whatsoever, including meals, shall be requested or accepted from vendors. Vendor Representatives and Cleveland Clinic employees are asked to report any violations of this procedure to the Law Department. For more information please reference the '[Financial Interest Disclosure Procedure](#).'
- If Cleveland Clinic personnel are employed by vendors as an additional employer, that employee is prohibited from engaging Cleveland Clinic on behalf of the vendor. This includes, but is not limited to, activity on vendors' behalf such as sales calls, emails, visits and patient care.

### **General Requirements:**

- Vendor Representatives may not use Cleveland Clinic phones, computers or other equipment for supplier's business or personal use unless devices are issued by department for intended business purpose.
- Vendor Representatives may not distribute or post any type of brochure, advertisements, pens, cups or similar promotional or marketing materials in the OR and/or associated areas or to any personnel.
- Vendor Representatives are not permitted to increase inventory levels in storerooms



and/or clinical areas.

- Vendor Representatives may not distribute or post any type of brochure, advertisements, pens, cups or similar promotional or marketing materials in the OR clinical area/ patient care areas or to any personnel.

### **Equipment/ Device/ Implant Set**

- All equipment/device/implant sets to be used by Vendor Representatives must be delivered at least 24 hours before a scheduled procedure to allow for inventory, sterilization, and/or biomedical safety evaluation in accordance with Cleveland Clinic's policies. Cleveland Clinic will not pay for equipment until the day of its use regardless of when it is brought in.
- All new products are subject to review by Supply Chain. A formal process has been established for documentation of product evaluations. Supply Chain Management will provide assistance with the required documents.
- All equipment/device/implant sets must contain a complete inventory checklist plus written cleaning and sterilization instructions.
  - This includes consigned and loaner instrumentation sets.
  - The inventory list for each kit must be made available in hard copy and electronically in Excel format and be provided to the corresponding department.
  - The inventory list must also be reconciled with the vendor and Cleveland Clinic personnel.
- All equipment and instrument trays must be removed within 48 hours of use.
- Upon completion of the surgical procedure, a complete inventory of any equipment, device, implant sets, or any other products brought into or used must be completed by the clinical staff.
- All instruments and related equipment used in the clinical area must be properly decontaminated prior to removal from Cleveland Clinic in accordance with Cleveland Clinic's policies and procedures.
- All staff training for new equipment, instrumentation or surgical instruments must be coordinated through Cleveland Clinic's clinical leadership at least one week prior to the scheduled surgical procedure.
- Under no circumstances will a Vendor Representative be permitted to:
  - Participate in hands-on delivery of patient care (e.g. scrub)
  - Provide initial training of equipment and/or supplies during a procedure
  - Independently hand up implants to the field. Implants must be verified by Cleveland Clinic caregivers following the Implant Verification process as outlined in the '[Universal Protocol Policy](#) and [Florida Universal Protocol and Safety Checklist Policy](#) prior to implantation'

### **Pharmaceutical Representatives:**

For information surrounding pharmaceutical vendor representatives please refer to the below policies:

- [Pharmaceutical Sales Representative Policy](#) and [Florida Pharmaceutical Sales Representatives Policy](#)
- [Cleveland Clinic Medical Staff P&T Committee Functions Policy](#) and [Florida Medical Staff P&T Committee Formulary System Policy](#)
- [Requests for Formulary Changes Through the Cleveland Clinic United States Medical Staff P&T Committee Policy](#) and [Requests for Formulary Changes Through the Cleveland Clinic United States Medical Staff P&T Committee Policy](#)

### **Vendor Non-Compliance**

1. Vendor Representatives who fail to comply with Cleveland Clinic policies will be subject to disciplinary action up to and including permanent loss of business privileges.
2. Continuous infractions or repeated violations to this standard operating procedure by Vendor Representatives may result in suspension, a request to replace company representatives, and possible loss of business privileges at Cleveland Clinic.
3. Violations committed by any one Vendor Representative of a given company may result in disciplinary action against any or all representatives of that company.
4. Disciplinary action may vary depending upon the nature of the infraction and the circumstances surrounding the offense. Supply Chain & Support Services reserves the right to determine the severity of the infraction and will use its discretion when assessing and determining the proper course of disciplinary action. Consequences may vary depending on the severity of the infraction.
5. Supply Chain & Support Services will notify vendor of the violation, the determined level of infraction, and the planned course of disciplinary action.
6. Duration of restriction of all activity and service calls may be 3 months, 6 months, one year, or permanent depending on extent of the infraction. Certain situations may require deviation from the guidelines outlined in this standard operating procedure. Supplier representatives can be banned from Cleveland Clinic permanently regardless of supplier representative's employer.

## **Resources**

[Vendor Handbook](#)

Link to *Authorization to Disclose Health Information*:

<http://my.clevelandclinic.org/ccf/media/Files/Patients/records-release-form.pdf>

## **Regulatory Requirements/References**

Joint Commission ORC.2901.01;

EC.02.01.01 HR.01.02.05

HR.01.04.01

[Identification Badges Policy](#)

[Vendor Visitation and](#)

[Interaction SOP](#)

[Weapons and](#)

[Contraband Policy](#)

### **Oversight and Responsibility**

Supply Chain & Support Services and Protective Services are responsible to review, revise, update, and operationalize this standard operating procedure to maintain compliance with regulatory or other requirements.