

<b>Title: Pharmaceutical Representatives Policy</b>	
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<b>Next Review Date: 01/30/2020</b>	<b>Author: Kerri Kilgore, Pharmacy Acute/Ambulatory Care P&amp;P Team</b>
<b>Approved by: BH System Practice Oversight Team, Pharmacy Directors, PolicyTech Administrators, 01/30/2018</b>	
<b>Discrete Operating Unit/Facility:</b> Banner Baywood Medical Center Banner Behavioral Health Hospital Banner Boswell Medical Center Banner Casa Grande Medical Center Banner Churchill Community Hospital Banner Del E Webb Medical Center Banner Desert Medical Center Banner Estrella Medical Center Banner Fort Collins Medical Center Banner Gateway Medical Center Banner Goldfield Medical Center Banner Heart Hospital Banner Ironwood Medical Center Banner Lassen Medical Center Banner Ocotillo Medical Center Banner Payson Medical Center Banner Thunderbird Medical Center Banner--University Medical Center Phoenix Banner--University Medical Center South Banner--University Medical Center Tucson East Morgan County Hospital McKee Medical Center North Colorado Medical Center Ogallala Community Hospital Page Hospital Platte County Memorial Hospital Sterling Regional MedCenter Torrington Community Hospital Washakie Medical Center	<b>Ambulatory Services</b> Banner Health Clinics Banner MD Anderson Cancer Center Banner Urgent Care Services Occupational Health/Employee Health Services University of Arizona Cancer Center  <b>Banner Pharmacy Services</b> Pharmacy Acute and Ambulatory Care

## Introduction

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**Purpose /  
Population**

1. Banner Health recognizes the positive services of pharmaceutical sales representatives in providing information and service. The purpose of this policy is to provide definite guidelines for the activities of representatives that are consistent with the goals of Banner Health and its facilities, which are:
    - To provide a controlled, safe environment for our personnel, patients and visitors
    - To protect the privacy of our patients and their families
    - To provide uninterrupted patient care services
    - To provide cost effective patient care
    - To prevent unauthorized solicitation of products and/or services
    - To maximize the use of Banner Health human resources
  2. Representatives are reminded that Banner Health is a private company and anyone on the campus is subject to the rules of Banner Health.
  3. This policy and the accompanying rules are promulgated by the Pharmacy and Therapeutics Committee and approved by the Executive Committee of the Medical Staff and the Administrative Governing Body. They are administered through the Department of Pharmacy Services.
  4. Population: All Employees, Patients and Vendors
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## Policy

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**Area of access**

1. The philosophy of the Banner Health is to serve the interest and needs of the patients, their families and personnel and to protect their privacy. Sales activities that are conducted in patient care areas or under inconvenient circumstances are prohibited. Limiting access of representatives to specific areas of the facility will be rigidly enforced.
  2. Pharmaceutical representatives will have only one access/contact point to the facility: the Pharmacy Department.
  3. Representatives are not permitted to be on the Medical Center campus unless they have an appointment, which should be made prior to entering the campus.
  4. Facility Security has the right to escort any representative from the facility at any time.
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## Policy, Continued

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### Rules regarding sales activities

1. Representatives MUST check in at the facility-designated site and receive a vendor badge which, along with their company badge, must be worn at all times.
2. Vendor badges should be returned to the designated site when leaving the facility.
3. Representatives are not allowed on the nursing units or in ancillary departments at any time unless accompanied by a Pharmacy employee or have received prior approval from the Pharmacy management for their appointment.
4. Sales activities are prohibited in all public areas including family waiting areas and facility libraries.
5. Representatives must not engage members of the Medical Staff, House Staff or Banner employees in a manner or time that will infringe upon their time and/or priorities.
6. Direct patient contact in the facility by the representative, while engaged in the course of their business, is strictly prohibited.
7. The Medical Center's paging system and internal mail system may not be used by representatives.
8. Pricing, cost information or perceived cost savings programs should not be shared with any employee of Banner without the permission of the Director of Pharmacy.
9. Representatives are prohibited from processing or facilitating physician requests for review of their products for formulary approval. Representatives are not liaisons between physicians and the Department of Pharmacy Services.
10. Refer to the following Compliance policy regarding meals, gifts, and entertainment:
  - [Compliance: Acceptance of Items from Outside Business Associates](#)

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### Samples

1. No samples are allowed in hospitals with exception of those facilities where clinics are hospital-based with responsibility of sample oversight lying with the inpatient pharmacy of the facility.
  2. The Department of Pharmacy Services does not hold or distribute samples to individual physicians.
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## **Policy, Continued**

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### **Displays**

1. Displays are coordinated and scheduled according to the guidelines in each facility.
2. Drugs included in the display must be approved by the Pharmacy Department one week prior to the display date. Failure to do so will constitute a cancellation of the display.
3. Drugs not on the Banner Health formulary cannot be displayed.

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### **Educational activities**

1. Banner Health's anti-solicitation policy prohibits the distribution of note pads, pens and other items of an advertising nature or the posting of any literature on walls or bulletin boards in patient care areas or any other area with public access.
2. It is the goal of the institution to work with the representative to ensure that information given to hospital personnel is complete and accurate. It is also the goal not to allow presentations that are not in the best interests of Banner Health.
3. The following procedure must be followed for all other educational programs:
  - The program, including information and materials for dissemination, must be approved by the Pharmacy Department one week in advance of the presentation.
  - The Pharmacy Department will work with the Nursing or departmental educator to define the need for the program and to determine who best should deliver the information.
  - The Pharmacy Department may choose to have a clinical representative at any approved program to assess the quality and completeness of the presentation.
  - Any presentation found to be lacking in accuracy and/or completeness will not be allowed to be repeated.

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### **Penalties**

1. Violation of these rules will result in one of the following actions by the Department of Pharmacy or Pharmacy Procurement/Supply Chain Management Services:
  - A verbal warning;
  - A written warning to the representative and a letter to the representative's company outlining the problem and the consequences of the practice, with a request that the practice be stopped;
  - A suspension of the representatives from the campus; or,
  - Suspension of any current or future committed purchasing contracts.

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## Policy, Continued

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**Penalties,**  
continued

2. The severity of the action will depend upon the nature and severity of the offense and will be determined on a case by case basis.
  3. Pharmaceutical Representatives may be suspended from all Banner facilities for violations that occur at an individual facility.
  4. Appeals to the above actions must be directed to the Director of Pharmacy who will adjudicate and decide the final disposition of the matter.
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## Procedure

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**Procedure**

<b>Role</b>	<b>Action</b>
First Time Representative	Call on the Pharmacy Director or his/her designee before calling on any other facility employee.
Individual Facility	Provide guidelines specific to each facility.
Pharmaceutical Representative	Be Familiar with, and adhere to, institutional guidelines.
Directors of Pharmacy	Communicate Pharmaceutical Representative violations to Pharmacy Department/Supply Chain Management and other Banner facilities.

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## Other Information

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**Other related policies**

[Compliance: Acceptance of Items from Outside Business Associates](#)

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