



UNIVERSITY OF UTAH HEALTH CARE

Medical Service Representatives (Pharmaceutical Company Representatives) Guidelines

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and the Medical Service Representatives Committee
under the auspices of the
Pharmacy and Therapeutics Committee,
Purchasing Department, and Supply Chain Management

Contact the Drug Information Service,
Department of Pharmacy Services for any questions.

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<http://healthcare.utah.edu/pharmacy/msr/>

Welcome to University of Utah Health Care

University of Utah Health Care (UUHC) is a premier academic health sciences center comprised of three hospitals, two specialty facilities, and numerous outpatient ambulatory clinics. UUHC is affiliated with the Colleges of Health, Nursing, Pharmacy, and School of Medicine. For additional information about UUHC, visit the institution online at <http://healthcare.utah.edu>.

Medical service representatives (MSRs), also called pharmaceutical company representatives or drug reps, are considered vendors at UUHC. MSRs are required to comply with organization-wide vendor policies as well as the guidelines and policies specifically related to MSRs, including School of Medicine vendor policies.

The MSRs provide valuable services to UUHC. MSRs and the companies they represent actively support UUHC in the following:

- Provide pertinent drug information
- Provide information on new products
- Assist in the acquisition of drug products
- Support research
- Support educational activities

The goal at UUHC is to develop and foster a collaborative relationship with MSRs and the companies they represent without inhibiting the ability of UUHC providers and staff to serve and care for patients. This booklet is intended to set the expectations for MSRs at UUHC, with the intent of creating a mutually beneficial experience. MSRs may find additional information regarding appointments, department contacts, building locations, and recent UUHC communication at <http://healthcare.utah.edu/pharmacy/msr/>. Expectations for MSRs at the School of Medicine are addressed in a separate policy.

UUHC Vendor Policies

A vendor is any representative or agent who promotes products, services or provides information to UUHC employees on behalf of manufacturers, supply distributors, or service organizations. The following applies to all vendors at UUHC; failure to comply with any vendor policy may result in discipline and impact UUHC's ability to conduct business with the violating vendor. The complete vendor policies can be found through the following link: http://healthcare.utah.edu/pharmacy/msr/Vendor_Policies.pdf.

Registration:

- UUHC requires that all vendors and MSRs are registered with the institution prior to visiting UUHC to comply with evolving Joint Commission standards.
- UUHC utilizes Status Blue (www.status-blue.com) to assist with the credentialing of MSRs.
 - Status Blue issues credentials to compliant MSRs who provide the required documentation (HIPPA, etc)
 - MSRs not registered with Status Blue will only be permitted to meet with the Department of Pharmacy Services; non-compliant MSRs will not be permitted access to UUHC facilities and staff until credentialing is completed.
- All MSRs new to UUHC should schedule an appointment with the Department of Pharmacy Services for orientation (<http://healthcare.utah.edu/pharmacy/msr/>).
- Comprehensive information regarding UUHC and Status Blue can be found at <http://healthcare.utah.edu/pharmacy/msr/002.htm>.

Identification and Checking In:

- MSRs visiting UUHC facilities are required to wear appropriate company-issued identification when visiting any UUHC location, including all hospital, all clinics, all physician and staff offices, School of Medicine, College of Pharmacy, College of Nursing, and any other area where patient related data may be located.
- MSRs visiting specific UUHC facilities are required to check in at those specific facilities and obtain a temporary identification badge. Specific locations are listed at <http://healthcare.utah.edu/pharmacy/msr/002.htm>.

Appointments:

- MSRs and vendors are required to have scheduled appointments with a UUHC contact prior to visiting any

UUHC facility.

- Solicitation of any kind by MSRs and vendors is not permitted and may result in disciplinary action.

Access to Patient Care Areas:

- MSRs are not allowed on any patient care unit of UUHC due to patient confidentiality and privacy laws.
- Patient care areas include nursing units, the emergency department, clinic areas, pharmacy satellites, and any ambulatory care pharmacy.
- If it is necessary for an MSR to be in a patient care area, they must have an appointment and be accompanied by that individual or their designee.

Vendor Parking:

- Vendors who visit UUHC or any other area of the Health Sciences facility on campus frequently are required to purchase a parking permit and are allowed to park only in designated areas for that permit.
 - Vendor "V" permits are allowed to park in any "A", "U" or "E" locations and in the Patient/Visitor Terrace, Level 1 only, excluding valet stalls.
 - Vendors who choose not to purchase a "V" permit may park in the South and ICI Terrace Pay Lots or any parking meters with the exception of the Red Loading Meters.
 - "V" permits may be purchased at Commuter Services, located at 1901 E. South Campus Drive, Room 101. Vendors are expected to follow all parking regulations and pay for all parking violations.
- Parking infractions may jeopardize a vendor's opportunity to do business at UUHC.

Purchasing Authority:

- MSRs may only accept official Purchase Orders from authorized personnel in the Department of Pharmacy Services.
- All other forms of requests (verbal, electronic, facsimile, etc) for medications or supplies from non-pharmacy personnel are considered to be invalid.

Distribution of Promotional Materials, Journal Articles, Product Information and Educational Materials:

- Vendors are not permitted to distribute, post, or leave any type of printed or handwritten material, advertisements, signs, or other promotional materials anywhere on UUHC premises.
- Unsolicited educational, promotional, or information materials may not be given to physicians and staff unless explicitly requested. Communication (i.e. mass mailings) to multiple practitioners via mail, e-mail or fax is also inappropriate.
- Journal articles are permissible materials that may be provided to staff by MSRs.
- Patient Education Materials are permitted, but may only be distributed to the appropriate department manager or supervisor. Leaving materials in patient care areas or distributing materials directly to patients is prohibited.
- All promotional materials, journal articles and patient education materials will be given to the Manager, Director, or their designee for dissemination to their staff.

Product Contract Pricing, Cost Savings, Value Analysis and Financial Information:

- MSRs are not permitted to discuss verbally or provide any written communication to UUHC customers outside of Pharmacy Support Services and Buying, Drug Information Services and Pharmacy Management regarding contract pricing, cost savings, value analysis and financial information.
- All inquiries from UUHC staff regarding this information shall be referred to the Drug Information Service.

Samples:

- UUHC does not allow drug samples within the organization and maintains a "NO SAMPLE" policy. Under no circumstances can prescription or OTC drug samples be left on any inpatient area or in any clinic of UUHC.
- Specific locations have exceptions to the "NO SAMPLE" policy. Please check with Drug Information Services for more information regarding these locations.

Gratuities and Gift Restrictions:

- The MSR will comply with the policy titled "Vendor Gift Policy and Other Vendor Policies."
http://healthcare.utah.edu/pharmacy/msr/Vendor_Policies.pdf
- MSRs are prohibited from providing UUHC employees with compensation such as cash, meals or gifts of any kind as an incentive to influence any transaction between UUHC staff and a business entity in which the

- employee has a substantial interest.
- MSRs may participate in MSR Committee sponsored display programs. For these displays, the MSR will pay the MSR Committee; the MSR Committee will provide food for the display.

Department of Pharmacy Services Specific Guidelines

UUHC and the Department of Pharmacy Services are interested in forging partnerships that are mutually beneficial with vendors. Understanding UUHC's pharmacy purchasing and pharmacies will facilitate the MSR's ability to navigate the institution more effectively and appropriately.

Group Purchasing Organization and Wholesaler:

- Group Purchasing Organization (GPO): Novation. We use Novation pricing for our acute care facilities and alternative site pricing.
- Wholesaler: Amerisource Bergen Corporation; specialty products are generally purchased through Amerisource Specialty Division
- UUHC does not purchase medications from unauthorized distributors or specialty pharmacies.

PHS 340b Eligibility and Pricing:

- UUHC is designated as a Disproportionate Share (DSH) or Safety Net facility, enabling the institution to receive Public Health Service (PHS or 340B) pricing on medications for specific areas.
- PHS pricing applies to all UUHC ambulatory care operations that care for UUHC registered patients. Medicare passed legislation in 2003 permitting manufacturers to extend PHS pricing to non-PHS accounts. UUHC prefers to work with vendors who are willing to extend PHS pricing in this manner.

Contracting:

- MSRs are only permitted to discuss and share contract terms with Drug Information Staff or the Manager of Pharmacy Support Services.
- The Administrative Director of Pharmacy is the only individual who has the authority to sign contracts in the Department of Pharmacy Services.
- All contracts are reviewed by UUHC Hospital Administration and Legal Council.
- All contracts offered to UUHC are assumed to be offered to all Novation facilities.

Pharmacy Contacts:

The Department of Pharmacy Services Leadership in conjunction with the Drug Information Services are the primary contacts for MSRs. The following individuals are the primary contacts for MSRs.

- Erin Fox, PharmD, Manager, Drug Information Service: UUHC liaison with MSR Committee; responsible for addressing clinical needs of UUHC.
- Kavish Choudhary, PharmD, MS, Manager, Pharmacy Support Services. Responsible for pharmacy supply chain, purchasing and contracting.
- Donald Alexander, PharmD, Clinical Coordinator: Coordinates UUHC's anti-infective stewardship program and only meets with MSRs regarding infectious diseases and anti-infective therapies.

Drs. Alexander, Choudhary and Fox meet with representatives at designated times via the MSR website:

<http://healthcare.utah.edu/pharmacy/msr/>.

- Erin Fox, PharmD, Manager, Drug Information Services: Coordinates and serves as Secretary of UUHC Pharmacy and Therapeutics Committee; meets with MSRs through appointments only.

In general, Department of Pharmacy Leadership does not meet with MSRs. If you find it necessary to contact them, please call the administrative staff at 801-581-2147 to be directed to the appropriate person. Below is a list of department directors and managers:

- Linda Tyler, PharmD, Administrative Director of Pharmacy Services
- Carolyn Kowalchik, RPh, MS, Director of Pharmacy, University Hospital
- Michael Kelly, RPh, MBA, Director of Pharmacy, Ambulatory Care Services
- Scott Silverstein, RPh, MS, Director of Pharmacy, Huntsman Cancer Hospital
- Russ Spence, RPh, MS, Director of Pharmacy, University Neuropsychiatric Institute

- Jay Lewandowski, RPh, Manager, University Home Infusion Services

Other pharmacy staff meet MSRs on an appointment only basis. Pharmacy staff may not be paged unless the staff member has left instructions with the Department of Pharmacy Services administrative staff to be paged. MSRs should work with the administrative staff to contact pharmacy staff and to arrange appointments.

UUHC Pharmacies:

Below is a listing with the description of the primary UUHC facilities and pharmacies. Additional information regarding UUHC pharmacies is available at <http://healthcare.utah.edu/pharmacy/msr/>.

| Facility | Pharmacy Services | Description | Contract Eligibility |
|---|---|---|---|
| University Hospital (UH) | <ul style="list-style-type: none"> ▪ Inpatient Pharmacy: serves inpatient beds, operating rooms and specialty clinics including University Infusion Clinic ▪ Outpatient Pharmacy: primarily serves patients and staff | UH is a 400+ bed level-one trauma center and regional burn center that houses numerous ambulatory and specialty clinics | <ul style="list-style-type: none"> ▪ Inpatient: Novation ▪ Ambulatory and Specialty Clinics: PHS ▪ Outpatient: PHS |
| Huntsman Cancer Institute (HCI) | <ul style="list-style-type: none"> ▪ Inpatient Pharmacy: serves inpatient beds and operating rooms ▪ Institute Pharmacy: serves all ambulatory settings including infusion center ▪ Outpatient Pharmacy: primarily serves patients and staff | HCI is an oncology research and patient care center that is part of the National Cancer Comprehensive Network. | <ul style="list-style-type: none"> ▪ Inpatient: Novation ▪ Institute and Clinics: PHS ▪ Outpatient: PHS |
| University of Utah Neuropsychiatric Institute (UUNI) | <ul style="list-style-type: none"> ▪ Inpatient Pharmacy: serves inpatient beds and clinics ▪ Outpatient Pharmacy: primarily serves patients and staff | UUNI is a 100 bed facility dedicated to providing inpatient and outpatient psychiatric care for adult and pediatric patients. | <ul style="list-style-type: none"> ▪ Inpatient: Novation (acute) ▪ Outpatient: Novation (retail) |
| University Orthopaedic Center (UOC) | <ul style="list-style-type: none"> ▪ Inpatient Pharmacy: serves inpatient beds, operating rooms, and clinics ▪ Outpatient Pharmacy: primarily serves patients and staff | UOC is a full-service specialty center that includes same day surgery, orthopedic, sports medicine and specialty clinics. UOC is capable of handling overnight patients. | <ul style="list-style-type: none"> ▪ Inpatient: Novation ▪ Operating Rooms and Clinics: PHS ▪ Outpatient: PHS |
| Moran Eye Center | <ul style="list-style-type: none"> ▪ Clinic (Institutional) Pharmacy: serves patients in operating rooms and clinics ▪ Outpatient Pharmacy: primarily serves patients and staff | Moran is a leading ophthalmic patient care and research center. | <ul style="list-style-type: none"> ▪ Clinic and Surgery: PHS ▪ Outpatient: PHS |
| <ul style="list-style-type: none"> ▪ Centerville ▪ Greenwood ▪ Madsen ▪ Parkway ▪ Red Butte ▪ Redstone ▪ Redwood ▪ South Jordan ▪ Stansbury ▪ Westridge | All facilities have Outpatient Pharmacies that service the respective clinics. | UUHC has a network of community clinics that provide primary and specialty care at various locations in the region. All the clinics listed have pharmacies in the facilities. | <ul style="list-style-type: none"> ▪ Clinics: PHS ▪ Outpatient: PHS |
| <ul style="list-style-type: none"> ▪ Sugar House ▪ Rocky Mountain Eye Center ▪ Utah Diabetes Center | No on-site pharmacy or pharmacy services | UUHC has a small number of ambulatory care facilities that do not have an on-site pharmacy. | All sites eligible for PHS |
| University Infusion Services (Home Infusion) | Home Infusion | University Infusion Services provides comprehensive care for patients needing this highly specialized care | PHS |

The Pharmacy and Therapeutics Committee and the Formulary

The Pharmacy and Therapeutics Committee (P&T) is a committee established by the Medical Board and mandated by The Joint Commission. Members include physicians from various disciplines, with additional representatives from Pharmacy, Nursing, and Hospital Administration. The main responsibility of P&T is to review the use of all medications at UUHC. P&T determines which agents will be admitted to formulary, which is the list of medications available for use at UUHC. In addition, P&T maintains an Outpatient Drug List designed to meet the needs of our ambulatory patients and staff which are reviewed in the same manner as formulary requests. Questions regarding

P&T and the UUHC formulary should be directed to the DIS.

Requesting medication for addition to UUHC Formulary:

- Only staff physicians can request drugs to be admitted to the formulary. The request needs to be submitted through the Drug Information Service (DIS).
- DIS is responsible for completing a comprehensive literature review of the medication, contact the manufacturer and request the American Managed Care Pharmacy (AMCP) dossier.
- Upon completion of the review, consideration of the formulary request is placed on the agenda at a future P&T meeting.
- All physicians requesting formulary additions are invited to attend the P&T meeting when the formulary request is discussed; if the requesting physician is unable to attend the meeting, P&T will defer action until the physician or his/her designee can attend.

P&T's Formulary Management Techniques:

- Closed Formulary: All drugs used at UUHC are reviewed prior to being admitted to the formulary. Only those agents proven safe and efficacious, and that offer advantages over other available agents are admitted to the formulary.
- Class reviews: When a request is made for a drug, all other drugs in that category are also reviewed to minimize therapeutic duplication.
- Restrictions: If an agent has limited uses or potential for inappropriate use, P&T may restrict the use of the agent via the approval of a specific service, or restrict the agent to a particular setting.
- Therapeutic Interchange: A group of drugs may be identified for therapeutic interchange if they have a similar safety profile, therapeutic use, and pharmacologic activity. The Pharmacy would then select the drug from the group that represented the most cost-effective choice. The selected drug would be the formulary agent. The others would be non-formulary. If a physician ordered the non-formulary agent from the group, the pharmacist would automatically interchange the selected agent.
- P&T uses levels designations to indicate the level of intervention.
 - Level 1 drugs have minimal interventions.
 - Level 2 drugs are admitted with either restrictions in place or as guided use drugs with approved criteria for use established.
 - Level 3 drugs require Medical Director approval for use within the facility. This designation is reserved for nonformulary drugs with very high costs, drugs that pose significant safety concerns, and drugs not used on therapeutic interchange programs.
 - MSRs are expected to only promote medications for approved criteria when criteria are established.
- The formulary is reviewed annually for additions and deletions. Products with low use or that no longer offer benefits to our patients are deleted.

Drug Shortages:

The UUHC Drug Information Service provides information on a nationwide basis about drug shortages. The information is posted at <http://www.ashp.org/shortages>.

- It is expected that MSRs and vendors share information regarding shortages, recalls and other issues with supply with the UUHC Drug Information Service and Department of Pharmacy Services.
- Please note that information regarding shortages will be shared at a national level.

UUHC Conferences:

MSRs may attend most posted conferences with the exception of Surgery Grand Rounds or Tumor Board. Please be considerate of the following issues.

- MSRs are expected to give priority to staff for attendance to the conference if space is limited.
- Conferences are not the appropriate venue to discuss individual issues with staff.
- Do not delay staff from leaving conferences.
- The conferences are teaching forums for various programs at UUHC; MSRs are not to be disruptive during the conference, saving questions for afterwards.

Educational Sessions:

Please note that educational sessions are to be free of promotional and branded materials.

- MSRs may contact the respective departments directly to set up inservices or educational sessions
- To set up a session with the Department of Pharmacy Services, please contact DIS

- UUNI: Only CME presentations are permitted; MSRs are not permitted to present inservices.

MSR Committee

This committee serves in an advisory capacity to the Department of Pharmacy Services and UUHC and performs peer review functions for MSRs. The purposes of this committee are:

- Maintain effective communication between UUHC staff and the pharmaceutical industry representatives.
- Participate in developing and implementing the organization's policies and procedures that affect MSRs at UUHC.
- Advise the Department of Pharmacy Services concerning disciplinary action against MSRs.
- Develop and conduct peer review procedures concerning the activities of MSRs.
- Orient new representatives to UUHC
- Coordinate pharmaceutical displays and maintaining finances that facilitate the display program.

The MSR Committee meets monthly and consists of 6 - 8 MSRs who are expected to serve a term of two years and is lead by an elected chairman. Representatives from the Department of Pharmacy Services serve as liaisons to the committee. Additional information regarding the MSR Committee, including contact committee contacts can be found at <http://healthcare.utah.edu/pharmacy/msr/>.

Pharmaceutical Displays or Exhibits:

Displays are coordinated through the MSR Committee. The MSR Committee arranges pharmaceutical displays and exhibits in the following locations:

- Surgery/Medicine (School of Medicine)
- Huntsman Cancer Hospital
- Diabetes Center
- Clinics: Greenwood, Madsen (OBGYN), Parkway, Redstone, Redwood, and Stansbury

Several guidelines have been set up to help the process run smoothly:

- Only members of the MSR Committee are permitted to contact the departments or locations concerning displays.
- MSRs may sign up for a display from the MSR webpage (<http://healthcare.utah.edu/pharmacy/msr/>).
- An MSR Committee member will coordinate all room and food arrangements, and distribution of flyers to notify departments of the display. A fee is collected from each MSR participating in the display to cover food expenses. Please note that this is the only exception to UUHC's no food policy; the MSR Committee is responsible for collecting fees and covering the costs of food at the displays.
- An MSR Committee member will be present on the day of the display to coordinate logistics and help with any problems.
- Sign up is on a first come, first serve basis. Certain displays may have sign up limits; refer to each specific display's requirements for limit details. However, if slots are unfilled within 2 weeks of the display, an MSR may display regardless of how recently they last participated. The Department of Pharmacy maintains an alternate list. The MSR Committee member responsible for that display will fill the slots from those listed as alternates.
- MSRs who cancel within 2 weeks prior to the display, must find a replacement or pay the fee if no alternate has signed up. An MSR who does not show up to a scheduled display is responsible to pay for their slot within 2 – 3 business days after display date. Failure to do so will jeopardize that MSR's privilege to participate in displays in the future.
- All UUHC policies regarding vendors are applicable on the days of displays. No drug samples (including OTCs) may be distributed at any display.
- Information and printed matter are the most appropriate materials to distribute at displays. Other items are prohibited by some departments. Please check to see if there are any special requirements.

Disciplinary Action Against Medical Service Representatives

The UUHC Department of Pharmacy Services and MSR Committee are committed to developing a mutually beneficial and collaborative relationship with MSRs and their respective companies. However, as problems arise, specifically with MSRs, the UUHC Department of Pharmacy Services and MSR Committee are committed to

addressing them in a constructive, fair, and timely manner.

Infractions of these guidelines or instances of interfering with patient care on the part of an MSR should be reported to Drug Information Administrative Services. Reports of infractions may be made by calling the Drug Information Service at 801-587-9842.

Department of Pharmacy Leadership and Drug Information Services coordinates MSR disciplinary action and regularly collaborates with the MSR Committee. Disciplinary action is indicated when an MSR acts in disregard to the guidelines presented in this booklet, interferes with the ability of hospital personnel to care for patients or perform their job responsibilities, or violates state or Federal laws and regulations. Actions that are not in accordance with PhRMA Guidelines would also be cause for disciplinary action. Types of action that could be taken can include (but are not limited to) any of the following:

- Discuss issue with representative and outline strategies to prevent problems.
- Discuss issue with district manager.
- One or more members of the MSR Committee may discuss the situation with the MSR that is involved. This, by itself, is most appropriate for first time problems involving less serious offenses. This is often a part of any other action that is taken.
- A letter to the MSR.
- A letter to the MSR and their district manager.
- A letter to the MSR, district manager, and company sales manager.
- Revoke display privileges.
- Ban the MSR from the HSC for a period of 3 to 12 months.
- Termination of future business.

Novation is also notified of any disciplinary actions. Novation analyzes the data it receives from its members for widespread non-compliance within the industry.

Summary

UUHC is committed to fulfilling its mission in caring for patients. In addition, UUHC is committed to active research and teaching programs. The Department of Pharmacy Services values the association it has with vendors and MSRs and look forward to collaborative and mutually beneficial relationships with them.

Contact Information

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