



# Moffitt Cancer Center

## Policy: *Vendor Credentialing via Reprax*

<b>Responsible Office:</b>	Office of General Counsel	<b>Category:</b>	Governance and Administration
<b>Authorized:</b>	Executive Vice President, General Counsel	<b>Policy Number:</b>	ADM-V001
<b>Review Frequency:</b>	3 years	<b>Effective:</b>	10/2015

### Policy Statement

- I. This policy provides a cohesive process for managing Vendor credentialing using the tracking and monitoring of Vendors and Vendor representatives. Reprax will help the Center obtain, verify and maintain Vendor credentials and Vendor access while physically at the Center.
- II. Utilization and implementation of the Reprax program is for the promotion of safety and health of our patients, staff, and Vendors.
- III. Enforcement of this policy will be the responsibility of Center staff in conjunction with Security. This policy overrides and supersedes any other departmental guidance regarding these issues.
- IV. For purposes of this policy:
  - A. Vendor credentialing is defined as the process of establishing the qualifications of an outside Vendor. The actual credentialing requirements will differ depending upon the category and the context in which the Vendor is engaged at Moffitt (see attached Vendor qualifications/requirements pursuant to category). Vendor credentialing will be used at Moffitt to assess and verify the background, qualifications, certifications, inoculations and legitimacy of a Vendor relied upon to contribute to the supply chain at Moffitt.
  - B. Vendor requirements by category are established through Reprax. Vendor requirements will be reviewed by the Moffitt Reprax Committee on an annual basis to ensure the compliance with industry standards and Moffitt's needs.
- V. General Guidance
  - A. Vendors will be expected to abide by the Center's Code of Ethics and Business Conduct in all their dealings with the Center, as well as any other policy of the Center.
  - B. All Vendors entering the Center or Research premises will be required to visit the appropriate Reprax kiosk to obtain a Moffitt-issued badge. The Vendor shall wear the temporary badge visibly on the upper torso. Upon completion of the appointment, Vendors shall return to the point where they obtained the badge, turn in the badge, and log out at the Reprax kiosk.
  - C. Vendors are required to establish appointments with specific individuals in advance of their visits to the Center. Please note that Reprax does not track appointments.
  - D. Vendors will not have direct access to server rooms, IDF closets and data centers. If they need access to a server room, IDF closet or data center, then they will have to be escorted and accompanied during their time there.
  - E. Moffitt's Vendor credentialing process does not track whether or not approved Vendors have appointments; however, it is the expectation of Moffitt that all Vendors who arrive at the Center have a valid appointment. A Vendor who arrives without a pre-approved appointment may be asked by Department Staff to leave the premises.



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- F. Vendors who violate any element of this policy may be asked to leave the premises immediately and may be prohibited from returning in the future if the transgression caused any disruption in any Center operation or patient care related services.
- G. Vendors shall be escorted at all times by staff any time the visitation occurs in a sensitive area to include: business offices, research areas, Human Resources, physician offices/suites, Health Information Management Department, Facilities, Pharmacy, the Operating Room or any area where patients are treated or being counseled.

### VI. Patient Confidentiality

- A. All Vendors working at the Center must abide by the Center's Confidentiality Policy (#ADM-C017) and may be required to sign an Information Systems Confidentiality and Software Compliance Agreement provided for review during their enrollment into Reprax.
- B. Patient privacy and patient-specific information will always be safeguarded, as required by law, and the Policies of the Center.
- C. Vendors will not be provided patient information without appropriate authorization. In support of research, and according to policy and law, data may be provided with patient information redacted.
- D. Vendors/contractors may be permitted in patient care areas, and allowed access to patient records only when essential for purposes of new equipment installation, calibration and training, service, or problem solving. In these instances, all policies pertaining to patient confidentiality will be followed.
- E. Vendors will not be allowed to participate, or otherwise attend Case Conferences where specific patient information is discussed unless they are attending a Center-approved preceptorship.
- F. Vendors are prohibited from directly contacting patients of the Center with the intent of promoting their product without specific advanced approval from Moffitt leadership.

## Purpose

This policy provides Vendors and contractors desiring to do business with the Center with guidance in the following areas:

- Procedures to follow for registering with Reprax in order to gain approval to access the Center's main campus;
- Procedures to follow for gaining access to the Center's main campus once Reprax enrollment has been completed and credentials have been verified;
- Check-in and exit processes at designated Reprax kiosks and corresponding allocation of photo badges;
- Procedure for wearing badge while at the Center and return of badge at conclusion of the visit;
- Policy and contact procedure for Vendor access disputes and compliance issues;
- Acceptable access by Vendors/contractors to patients of the Center and/or related patient-specific clinical or research information;

At no time is this policy meant to limit access or reduce competition.



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### Scope

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This policy is implemented to provide guidance, which will assist the Center including its clinical staff and physicians, in providing high quality, uninterrupted patient care, and to maintain the highest degree of patient confidentiality. All Vendors will adhere to Moffitt System Procedures, and will abide by the laws and regulations of the State of Florida, federal government, The Joint Commission (TJC), AORN, HIPAA Privacy Rule, and other regulatory standards of practice. The policy applies to all Vendors/contractors who are on main campus. Please see **Exhibit 1** detailing the Vendor categories and their corresponding definitions as defined by the Reprax system.

**Stakeholders:** Corporate Compliance, Safety/Security, Research, and Clinical.

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### Procedures

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- I. Badge
    - A. Prior to conducting business with Moffitt Cancer Center, a Vendor is required to register with Reprax, a web-based system utilized to manage vendor credentials at Reprax.com. Initial registration will be completed by the Vendor(s) at their expense. Upon confirmation of valid credentialing through Reprax, the Vendor may make an appointment to visit the Center. Please see attachment **Exhibit 1** detailing the vendor credentials required pursuant to their specific category.
    - B. Vendors are required to immediately visit the appropriate kiosk upon arrival to obtain a Moffitt badge. Reprax kiosks are available at the locations detailed below. Please see attachment **Exhibit 2** providing a map of the Reprax kiosks.
      - The Main Center entrance (Red Valet)
      - The Faculty Office Building (Blue Valet)
      - The Clinic Building entrance (Gold Valet)
      - The Stabile Research Center entrance (Gold Valet)
      - The Research Center Building entrance
    - C. Upon credential verification by the Reprax kiosk, a temporary photo badge that includes a photo, name and visit details will be printed. Reception staff shall direct the Vendor to the approved appointment location or call the receiving department for Vendor instructions.
    - D. The following groups are excluded from Reprax registration:
      - Clergy
      - Monitors for research studies
      - Visitors
      - Volunteers
      - Trainers
      - Temporary staff
    - E. Upon completion of each visit, the Vendor must log out at one of the Moffitt Reprax kiosks. Failure to log in or out could jeopardize future business with the Center.
    - F. Failure to comply with these Procedures shall result in the loss of Vendor's privileges, and exclude the Vendor representative from further transactions with Moffitt. Length of
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privilege loss will be determined on a case by case basis by the Moffitt Reprax Committee in consultation with the appropriate department(s).

### II. Enforcement of Policy

- A. Any infraction of this policy may affect the Vendor's registration and access to Moffitt Cancer Center. Based on the seriousness of delinquency of the credentials, the Vendor will be reprimanded as follows:
1. All Vendors that have not enrolled in the Reprax System will be denied the production of a badge and will in return be denied access to the Center.
  2. Non-compliant Vendors will need to contact Reprax to determine the formal reason(s) for the denial of access and they will need to rectify the non-compliance with Reprax. No questions and/or requests for exceptions to the category requirements by the Vendor will be directed to Moffitt. All inquiries regarding compliance and access issues will be directed to Reprax for discussion and resolution.
  3. A report indicating all non-compliant Vendors will be reviewed by the Moffitt Reprax Committee to determine the necessity of access for the Vendor and whether on-going access will be granted.
  4. Repetitive denials by Vendors and/or their organizations may result in indefinite revocation of access to the Center.
  5. All current Vendors will receive a one-time, seven (7) day grace period to fix all expired credentials. During this grace period, if appropriate, masks must be worn at all times. If credentials are not compliant within seven (7) days the Vendor's access will be revoked.
  6. New Vendors will receive a seven (7) day grace period to complete all credentialing requirements. During this grace period masks, if appropriate, must be worn at all times. If credentials are not compliant within seven (7) days the Vendor's access will be revoked.

## Forms

[Information Systems Confidentiality and Software Compliance Agreement](#)

## Related Information

Policy # ADM-C017 Confidentiality of Patient Information

Policy # WR-06 Identification Badge

## Education

N/A



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### **Definitions**

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**Vendors-** Any person who provides goods (solids, liquids or gases), or services to Moffitt's main campus, including all independent contractors and consultants.

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### **References**

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N/A

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### **Appendices**

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Exhibit 1 - Credentialing Requirement by Category

Exhibit 2- Map of Reprax Kiosk Locations

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### **Revision History**

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01/2015, 10/2015