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Owner Steven Fischback  
Policy Area Pharmacy  
References Policy

## Sample Medications and Pharmaceutical Representatives

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### POLICY:

It is the policy of Confluence Health (CH) that pharmaceutical representatives will not have access to Practitioners during normally scheduled clinic hours or on a Confluence campus.

### PURPOSE:

- A. To eliminate access to sample medications within Confluence Health.
- B. To eliminate the access of pharmaceutical representatives to Practitioners during normal clinic hours.
- C. To eliminate the access of pharmaceutical representatives to any Confluence Health campus.
- D. To provide the lowest cost and most efficacious prescriptions to patients.

### PROCEDURE:

- A. **ACCESS:** Pharmaceutical Representatives access is not allowed in clinical areas. Pharmaceutical Representatives are not allowed to send unsolicited emails to Practitioners and/or staff or drop off unsolicited information (including invitations for distribution) at Confluence Health. The Pharmacy Managers will be the primary contact for all pharmacy-related representatives. Each pharmaceutical company will be allowed one representative per company.
- B. **SAMPLING:** No prescription (legend) drug samples are allowed on any Confluence Health campus. No Controlled Substances may be left as samples.
- C. **DRUG FAIRS/EDUCATIONAL OPPORTUNITIES.** Drug fairs will not be allowed at Confluence Health facilities. All educational information will be conducted through the Pharmacy &

Therapeutics Committee.

- D. **FOOD AND BEVERAGES.** Food and beverages may not be provided to Confluence Health practitioners or staff. Departmental lunches or snacks will not be allowed if provided by a pharmaceutical vendor.
- E. **GIFTS.** Substantive gifts (including pens) are not to be distributed to providers or staff.
- F. **POLICY VIOLATIONS.** Violations of any part of this policy by a representative should be reported to the Pharmacy and Therapeutics Committee and will result in the following progressive disciplinary process:
  - 1. **First Incident:** Written warning from the Pharmacy and Therapeutics Committee.
  - 2. **Second Incident:** Three-month ban of the company from the CH system.
  - 3. **Third Incident:** One-year ban of the company from the CH system. Incidents involving different individuals from the same company are cumulative for that company.
  - 4. **Fourth Incident:** Potential loss of formulary status of company's products where appropriate therapeutic alternatives exist and/or ban of the company from the CH system (duration to be determined by the Pharmacy and Therapeutics Committee).

**\*\*Note: policy must be published on the Confluence Health website as updates occur.**

## Approval Signatures

Step Description	Approver	Date
PolicyStat Administrator	Crista Davis: Regulatory Standards Coordinator	3/9/2021
EVP/ COO	Glenn Adams: Chief Operations Officer	3/9/2021
WVH Administrator/DNS	Catherine Brown: WVH Administrator - DNS	3/6/2021
CWH Administrator/CNO	Tracey Kasnic: CWH Hospital Administrator and CH CNO	3/2/2021
SVP	JoEllen Colson: Sr. Vice President Ancillary Services	2/23/2021
P&T Committee	Steven Fischback: Pharmacy Manager	2/23/2021
Director/WVH	Laurel Aaberg: Pharmacy Director	2/23/2021

Director/CWH

Larry Pelham: Pharmacy  
Director

2/23/2021

Steven Fischback: Pharmacy  
Manager

2/18/2021