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Owner: Steven Fischback: Pharmacy Manager
Policy Area: Pharmacy
References: Policy

Sample Medications and Pharmaceutical Representatives

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.
- E. To provide support and decision making tools for Practitioners such that Confluence Health is able to transition from "moderately" to "well managed" systems of care delivery within Healthy Options and Medicare Advantage.

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 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).

Attachments

No Attachments

Approval Signatures

Step Description	Approver	Date
PolicyStat Administrator	Crista Davis: Regulatory Standards Coordinator	2/17/2020
EVP/WVH COO	Glenn Adams: WVH COO	2/16/2020
EVP/CWH COO	Vikki Noyes: CWH COO	1/14/2020
P&T Committee	Steven Fischback: Pharmacy Manager	1/14/2020
Director	Laurel Aaberg: Pharmacy Director	12/10/2019
Director	Larry Pelham: Pharmacy Director	12/10/2019
	Steven Fischback: Pharmacy Manager	12/6/2019