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|  <b>Kaleida Health</b><br><b>POLICY</b> | <b>Title: Kaleida Health Access</b>                       | <b># FI.2</b>              |
|  | <b>Owner: Supply Chain Management/HR/Plant Operations</b> | <b>Issued:<br/>6/12/00</b> |
| <b>Keywords:</b> vendor, access, sales representative, credential, ID badges, Symplr                                     |   |                            |

**I. Statement of Purpose**

It is the practice of Kaleida Health to manage access to its sites in a manner that will protect the rights of the organization and its employees, ensure the safety of its patients and the confidentiality of their health information, and maintain our commitment to corporate compliance and business ethics.

This policy addresses the following:

Section A: Identification Badges

Section B: Vendor Access

Section C: Safety Orientation and Building Access for Contractors

**II. Audience**

All Work Force Members - The term "Work Force Member" means employee, independent contractor, agent, volunteer, trainee, or other person who performs work for Kaleida Health. This includes, but is not limited to, full and part time employees, affiliates, associates, directors, officers, managers, supervisors, volunteers, physicians employed by or otherwise affiliated with Kaleida Health, medical residents, nursing students, or others receiving training at any Kaleida Health facility, and others who provide goods and services to Kaleida Health.

**III. Instructions – (Outline necessary steps for consistent completion of process/ procedure)**

**A. Identification Badges**

1. As a condition of employment, employees and staff are required to prominently display the official Kaleida Health ID badge at all times while on Kaleida Health property during their on-duty hours. The badge must be worn picture side forward at chest or shoulder level. The identifying photograph must be visible.

a. The ID badge will contain the following:

- 1) Photograph
- 2) Full Name
- 3) Department
- 4) Signature

b. ID badges for certain employees may require job titles as required by the NYS Education Department for example, MD, DO, RN, LPN, Pharmacist and all employees engaged in direct patient care. In addition titles will be printed for director, administrator, VP, EVP and above as well as for Home Care employees. Degrees or certificates are not included on the ID badge. "Nursing" is used for all Nursing Units.

c. All employees and OBGYN Residents working on the Mother Baby Units, NICU and Labor and Delivery Units and who may be required to move the infant are issued pink ID. The pink ID is issued only upon written approval from the Unit Coordinator.

- d. New employees, staff and others required to display the Kaleida Health ID badge (see **Attachment A**) will produce a driver's license or other government issued picture ID, have their photo taken, complete the ID information form and be issued the badge at an ID badge production office. ID badge production offices are located at the following sites:

| <b>Site</b>                            | <b>Location</b>            | <b>Hours of Operation</b>                           | <b>Phone</b> |
|--|----------------------------|---|--------------|
| Buffalo General Medical Center         | Security ID/Parking Office | - Contact Security @ 859-5442                       | 859-2637     |
| DeGraff Memorial Hospital              | ID Room; HR Hallway        | - Contact Security via the hospital operator        | 690-2220     |
| Larkin                                 | 2 <sup>nd</sup> Floor HR   | Orientation Tuesdays or by appointment: 9am-10:30am | 887- 4905    |
| Millard Fillmore Suburban Hospital     | Security Office            | - Contact Security via the hospital operator        | 568-3600     |
| Visiting Nursing Association           | Human Resources            | Monday – Friday:<br>- 8:00 AM - 4:30 PM             | 630-8603     |
| Women & Children's Hospital of Buffalo | Security Office            | - Contact Security via X-7081.                      | 878-7400     |

- e. Replacement badges will be issued through the ID production office. A replacement fee of \$10.00 will be charged to the individual for a lost or stolen badge. There will be no charge for replacement of worn cards or when name or title changes occur; however, the old badge must be surrendered at the time of replacement.
- f. Individuals who come to work without their Kaleida Health ID badge may, at the request of their manager/supervisor, be issued a temporary ID badge. The temporary badge is for identification purposes only and as such will not be programmed for access and must be returned at the end of workday to the Security Department.
- g. The ID badge may not be loaned to or used by another employee or other person for any reason. Violation may result in disciplinary action up to and including termination.
- h. The ID badge is the property of Kaleida Health and must be returned to either HR or the appropriate manager upon termination of employment or affiliation.
- i. ID badges issued on a temporary basis need to be returned to the same department that assigned it.
- j. The ID badge may not be defaced in any way including punctures resulting from the placement of pins or other designations.

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- k. The photograph is not to be covered and the last name is not to be erased, removed or covered. Failure to follow this directive may result in disciplinary action up to and including termination of employment.
  - l. Failure to prominently display the ID badge may result in disciplinary action up to and including termination of employment or status.
  - m. Failure to present the Kaleida Health ID upon the reasonable request of a Kaleida Health Security Officer may result in disciplinary action up to and including termination of employment.
  - n. Enforcement of the Plan is the responsibility of the Security Department as well as all managers and supervisors.
  - o. Kaleida Health reserves the right to use the badge photo and badge information for internal employee directories.
2. Others Requesting Issuance of Kaleida Health Identification Badges (see Attachment A)
- a. Kaleida Health ID badges are issued to non-staff only in rare cases.
  - b. The individual requiring a badge must bring a copy of the *Identification Badge Request* (see Attachment B) completed by an authorized Kaleida Health representative to the ID production office at the specific facility to obtain the badge.
  - c. Proof of a recent physical examination, approved by Employee Health, will be required if the individual will be involved in direct patient care or other activities of concern.
3. Security Access Levels
- a. At facilities where the ID badge is used for access purposes the Security Department, upon notification, will assign the appropriate access level.
  - b. In areas with controlled access, the Security Department may issue “key cards” to a designated management representative who will be responsible for day-to-day distribution, use and return of the cards.

**B. Vendor Access**

For the purposes of this document, the term “vendor” is defined as a company that provides goods or services to Kaleida Health including but not limited to medical devices, products, services and/or equipment and the employees, subcontractors, agents and representatives of such companies.

- 1. Areas that will be classified as In Scope are:
  - a. In Patient Care areas
  - b. Out Patient Care areas
  - c. Retail locations

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2. Areas that will be classified as Out of Scope are:
  - a. Common areas
  - b. Back office
  
3. Definitions
  - a. Up to date immunizations
    - 1) Vaccination or immunity to measles, mumps, and rubella
    - 2) Varicella vaccinations
    - 3) Titer or positive history is accepted
    - 4) Annual negative PPD
  
  - b. Criminal background checks
    - 1) Federal search – Felony/Sex offender
    - 2) Government watch list for Symplr vendors  
Symplr only – Kaleida not required
  
  - c. Kaleida Policies
    - 1) Corporate Annual Review
    - 2) Code of Conduct – LE.5
    - 3) Parking procedures – ADM.30
    - 4) Kaleida Health Access Guideline – F1.2 Attachment F
    - 5) Certain departments may require additional procedures
  
4. Credentialing Requirements
  - a. All vendors doing business with Kaleida Health are expected to be credentialed through 1 of 4 acceptable methods for in scope areas. The contract owner will determine the method of credentialing during contract review.
    - 1) Symplr credentialing
    - 2) Kaleida Onboarding – HR.1
    - 3) Kaleida Contracting
    - 4) Escort with Kaleida employee
  
  - b. All vendors accessing an in scope area at a Kaleida Health facility are expected to adhere to the requirements of this policy. Kaleida Health recognizes that there may be occasions in which a vendor disregards this policy and obtains access. When such a situation is discovered, Kaleida Health will follow the Consequences of Policy Violation by a Vendor (section 2 below).

c. Credentialing matrix

| <b>Method</b>    | <b>Compliance</b>   | <b>Verification</b>  |
|------------------|---|--|
| Symplr           | Follow guidelines as outlined in Attachment F of policy.<br>(Kaledia Health Vendor Access Guidelines)   | Symplr daily boarding pass                                     |
| On-Boarding      | Adhere to Policy HR.1 Orientation   | Kaledia ID tag with personal ID                                |
| Kaleida Contract | Vendors credentialed through contracts will be required to provide proof of compliance for immunizations, criminal background, and policies as defined in definitions at any time for staff that are within scope of this policy.   | Kaleida Vendor Sticker (NC03295)<br>Vendor Access Log (NC3297) |
| Escort           | Those vendors not routinely at Kaleida may be escorted by a Kaleida employee at all times when in an in scope area. It is the department managers responsibility to ensure the safety of patients for escorted vendors. In an event of an emergency the escort will be responsible to advise the vendor of the Kaleida policies to ensure safety. | Kaleida escort   |

5. Consequences of Policy Violation by a Vendor

a. The following steps will be taken in the event of violation of this policy by a vendor. The severity of any infraction may necessitate the skipping of certain steps.

- 1) Will be asked to leave the in scope area or security will be contacted.
- 2) Follow the Kaleida Health Vendor Evaluation Process (FI.33) and Corrective Action Plan.
- 3) Limited ban of vendor or sales representative from Kaleida Health property for vendor or sales activities.
- 4) Permanent ban of vendor or sales representative from Kaleida Health property for vendor or sales activities.
- 5) Termination of vendor or sales representative relationship.

b. The VP Supply Chain Management and Director of Purchasing, or designee, are responsible for enforcement of these steps.

**C. Safety Orientation and Building Access for Contractors**

1. Short Term Projects

Contractors retained to provide minor building repair and modifications are required to adhere to section 1 a of this policy if in an in-scope area, and then report to the site Plant Operations office before starting work and sign in on the Plant Operations Contractor Sign-in Sheet (Attachment C). At this time the contractor's employees assigned to the facility will receive a copy of the

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Contractor, Correctional and Law Enforcement Personnel Safety Information Sheet (Attachment D). The safety information is to be read and understood by each individual.

2. Long Term Projects  
Contractors retained for major or on-going projects, in excess of one week, are required to attend the formal Kaleida Health Contractor Safety Orientation (Attachment E). This orientation will be coordinated through the site Plant Operations office or the Corporate Projects Department and presented by one of the Kaleida Health Safety Officers. The above mentioned sign-in/sign-out procedure will be followed and all contractors will be required to wear a badge.
  
3. Contractor Entry/Work Procedures (Off Hours)  
To ensure that only authorized work is performed by contractors during off hours, contractors will not be permitted entry to any Kaleida Health facility without proper authorization from the Plant Operations, Security, Clinical Engineering or Information Technology (IT) staff responsible for the work to be performed.
  - a. Before beginning work the crew chief or foreman will present at the Security Office or post advising of the intent to perform work in the facility. If the proper notifications have been made the crew will be permitted entry after all contract employees have been signed in by the foreman and the contractor ID badges have been issued.
  - b. Security Officers will verify that the Safety Information has been previously discussed with the crew.
  - c. Security Officers will require identification or proof of employment from members of the crew as needed.
  - d. Should there be any confusion regarding entry permission or areas of work the Kaleida Health employee authorizing access may be contacted. If contact is not made work will not be permitted.
  - e. Contractors are expected to remain in the pre-designated work areas.
  - f. If hot work procedures are to be conducted the crew must present a copy of the appropriate Hot Work Permit, issued through Plant Operations. Hot Work operations will not be allowed without the permit. (see Hot Work Permit Program SS-B.4)
  - g. Security Officers will open areas for the contractors as needed and authorized.
  - h. It is expected that the contractor will notify Security when the authorized work has been completed and sign out. Security Officers will inspect the work areas to ensure that life safety has not been compromised and secure as necessary.
  - i. Any problems encountered will be documented and reported to the site Security Supervisor and the responsible Kaleida Health employee the next business day.

**IV. Approved by - (Include date)**

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| Internal Audit and Compliance       | 6/3/10, 11/13                                       |
| Chief Financial Officer             | 6/21/10, 12/13                                      |
| Corporate Policy Approval Committee | 12/13/13, 2/14/14, 2/13/15, 6/10/16, 8/12/16, 10/16 |

**V. References**

- [Fl.33](#) – Vendor Performance Review
- [LE.5](#) – Code of Conduct and Business Ethics
- [ADM.30](#) – Parking Procedures
- [HR.1](#) – Orientation
- [SS-B.4](#) – Hot Work Permit Program

NC03295 – Vendor Badge – via Forms on Demand  
 NC03297 – Vendor Access Log – via Forms on Demand

- [Attachment A](#) – Kaleida Health ID Badges
- [Attachment B](#) – Identification Badge Request
- [Attachment C](#) – Plant Operations Contractor Sign-In Sheet
- [Attachment D](#) – Kaleida Health Contractor, Correctional & Law Enforcement Personnel Safety Information Sheet
- [Attachment E](#) – Kaleida Health Contractor/Corrections/ Law Enforcement Orientation Program Checklist
- Attachment F – Kaleida Health Vendor Access Guidelines

NYS:10 NYCRR §405.7(b)(3)  
 Federal: 42 CFR §482.13©  
 DNV: PE.4 SR.1, 2 & 3

Standards and Recommended Practices and Guidelines 2002 AORN.  
 AORN 2002 Position Statement

Health Insurance Portability and Accountability Act (HIPAA)

**Version History:**

| <b>Effective Date:</b> | <b>Reviewed/ Revised</b> |
|------------------------|--------------------------|
| 11/7/16                | Revised                  |
| 8/29/16                | Revised                  |
| 7/5/16                 | Revised                  |
| 6/8/15                 | Revised                  |
| 3/2/15                 | Revised                  |

Kaleida Health developed these Policies, Standards of Practice, and Process Maps in conjunction with administrative and clinical departments. These documents were designed to aid the qualified health care team, hospital administration and staff in making clinical and non-clinical decisions about our patients' care and the environment and services we provide for our patients. These documents should not be construed as dictating exclusive courses of treatment and/or procedures. No one should view these documents and their bibliographic references as a final authority on patient care. Variations of these documents in practice may be warranted based on individual patient characteristics and unique clinical and non-clinical circumstances. Upon printing, this document will be valid for 1/11/2017 only. Please contact Taylor Healthcare regarding any associated forms.