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Administrative Manual

Section: Patient Rights and Organizational Ethics

Policy Number: 190

VENDOR / CONTRACTOR RESPONSIBILITY POLICY

Objective: To establish a policy to ensure the safety and privacy of Covenant HealthCare's staff and patients.

To establish a policy to ensure the fair and consistent treatment of vendors wishing access to solicit Covenant HealthCare for the sale of goods or services.

Scope: All Covenant-owned Facilities, including but not limited to, hospital(s), ambulatory surgery centers, home health agencies, physician practices, and other corporate departments.

Policy: Vendors may not visit any hospital department without prior Vendormate registration and sign-in for a pre-arranged appointment with a specific Covenant HealthCare staff member / department.

Vendors may not bring or ship supply items and/or equipment to any Covenant HealthCare facility unless an authorized request has been processed through the Supply Chain Management Department and a purchase order number has been assigned. This includes all equipment and/or supplies delivered for trial or for in-house use. The purchase order number must appear on all packing slips and invoices. Allowances will be made for emergency circumstances. These allowances will be coordinated through the Supply Chain Management Department or through the affected Department's Director.

Vendors will support all applicable Covenant HealthCare policies and procedures. Actions resulting from violations of this policy are outlined below. Covenant HealthCare Supply Chain Management Department provides guidance to Vendor representatives in support of this policy.

Covenant HealthCare does not and will not assume any liability under any law relating to Worker's Compensation on account of any Vendor representative.

Procedure:

1. Supply Chain Management will provide electronic Vendor clearance for the 700 and 900 Cooper and Harrison Campuses, Michigan and Mackinaw. For visitation to these campuses Vendors must sign-in at the Supply Chain Management department, Andersen Center or at the front desks of Covenant 700 and 900 Cooper, Harrison, Michigan and Mackinaw Campuses. Vendor clearance for all other Covenant HealthCare facilities will be provided by the receptionist at the main desk at each specific campus. For visitation to these campuses Vendors must sign-in at the main desk of the campus they have pre-arranged a visit with.

Covenant HealthCare facilities that do not have a reception area must document a vendor access control procedure and must communicate that procedure to Supply Chain Management.

If electronic vendor pass is unavailable reference Standard Work Sheet for Vendormate Downtime Contingency.

2. Covenant staff will meet with Vendor only with a pre-arranged appointment, after Vendor has signed in, and Vendor is wearing a Covenant HealthCare pass. If these conditions are not met, the Covenant staff will contact Covenant Security who will then escort the Vendor to the Supply Chain Management department.

Arrangements for Contractor Passes must be approved by and coordinated through, in order, Supply Chain Management, Security and Human Resources.

- a. Covenant department management requesting a Contractor Pass must authorize (via signature) and submit a Contractor Pass request form, which will be vetted by the above-referenced Covenant departments.
 - b. Vetting will include the company and individuals registering through Vendormate; level of access to Covenant facilities / departments will also be determined before a Contractor Pass is issued.
 - c. Cost associated with vetting / issuing of Contractor Pass will be bore by the requesting individual / company.
 - d. Note: Contractor Passes will be time limited.
3. All negotiations of purchased goods, services, and contracts must be conducted through Covenant's Supply Chain Management department. All negotiations are to be conducted ethically without attempts to influence by

offering gifts (including but not limited to, entertainment activities, trips, personal discounts, meals, and loans).

4. Vendors must coordinate requests for product evaluations through the Supply Chain Management department before the product is purchased. If the evaluation request is appropriate a Covenant HealthCare staff member will be assigned to champion the request to the appropriate Clinical Quality Product Value Analysis committee.
5. To ensure timely accounting for items that may potentially be used in a procedure, all previously approved items that are being brought into Covenant Healthcare will be itemized on the spreadsheet located at <https://www.covenanthealthcare.com/Main/Vendors.aspx> (Item Build Worksheet). This shall be completed at least five (5) days prior to the procedure and sent to contracts@chs-mi.com.
6. Vendors will schedule all shipments to be delivered to the Harrison Receiving Dock unless otherwise arranged with the Supply Chain Management Distribution Manager. An itemized packing slip listing each item and listing the assigned purchase order will accompany each shipment. Deliveries will be received at the Harrison Receiving Dock Monday through Friday between 6:00am and 3:00pm EST excluding recognized holidays.
7. Vendor performance is reviewed periodically based on such factors as hospital visits, deliveries, service, pricing, and Covenant HealthCare policy compliance. Vendors not performing to Covenant standards will risk the loss of Covenant business.
8. Request for Vendor Visitation
 - a. Vendor arranges appointment time, date, and location with a specific and appropriate Covenant HealthCare staff member.
 - b. Vendors will sign-in at the reception desk as outlined in the Policy above.
 - c. Vendor will disclose his/her appointment details including reason for visit, department being visited, and Covenant HealthCare staff with whom the Vendor has a pre-arranged appointment.
 - d. If Vendor is signing in electronically, the Vendor Pass will print automatically. If signing in manually, receptionist will issue a Vendor pass. The Covenant provided Vendor pass must be worn at all times above the waist, clipped on the clothing or a lanyard, while Vendor is at Covenant facilities.
 - e. At the conclusion of the meeting, Vendor will proceed directly to the reception desk at which he/she signed-in,

electronically/manually sign out, and surrender his/her Covenant HealthCare pass, and immediately exit the facility.

- f. The receptionist will forward the sign-in sheet, when completed, to the Supply Chain Management department via inter-office mail so that Vendor compliance can be monitored.

Policy Violations

The following information exemplifies what Covenant HealthCare defines as violations to these (and related) policies and procedures: (This is not meant to be a comprehensive list.)

1. Failure to check in upon visiting Covenant HealthCare
2. Failure to wear a Covenant HealthCare pass while conducting business at Covenant HealthCare
3. Attempting a visitation without a pre-arranged and specific meeting time, location, and individual
4. Attempting to negotiate prices for goods, services, and/or contracts without Supply Chain Management involvement
5. Bringing and/or shipping supply items and/or equipment to Covenant HealthCare without an assigned purchase order
6. Attempting to circumvent Covenant HealthCare's Clinical Quality Product Value Analysis procedure
7. Providing non-approved meals or refreshments
8. Failure to comply with Covenant HealthCare's gift policies to individual Covenant staff members
9. Solicitation in unauthorized areas
10. Displaying products in non-pre-approved Vendor Display areas

A first violation will result in a warning sent, via e-mail and USPS, to the Vendor representative and the Vendor's corporate office, from Covenant HealthCare's Supply Chain Management Director.

A second violation will result in a warning sent, via e-mail and USPS, to the Vendor representative and the Vendor's corporate office, from Covenant HealthCare's Supply Chain Management Director. This representative will be banned from all Covenant HealthCare facilities until he/she has attended a counseling session with the Director of Supply Chain Management.

A third violation, or any independent act(s) considered grievous, will warrant immediate expulsion of the Vendor representative from Covenant HealthCare, a permanent ban of future access to any of its facilities (for either their current represented company(s) and any future company(s) he/she may represent), with further consideration of an immediate termination of the Vendor business relationship, including any of its existing contracts.

Related Policies, Procedures, Guidelines, Physician Order Sets, Care Plans:

- Administrative Manual #1202 – Bribes
- Administrative Manual #1204 – Business Courtesies and Gifts
- Administrative Policy #1209 Code of Conduct
- Administrative Manual #1246 – Sanctioned Individuals or Companies Prohibition Employing
- Contractor Pass Request
- Human Resource Manual #701 Dress Code
- Human Resources Manual #805 Business Courtesies
- Administrative Policy #6.41 Clinical Quality Product Value Analysis

Effective Date: April 2004

Review Date: August 2018

Revised: July 2004, September 2004, October 2007, March 2010, March 2013, February 2016, June 2017, February 2018

Reviewed by: Supply Chain Management – February 2018

Safety Committee – April 2004, September 2004, September 2007, October 2007, March 2010, July 2017

Facilities Services Leadership – March 2013, February 2016, July 2017

Administration – September 2004, September 2007, October 2007, March 2010, February 2016, August 2017

Empower Revenue Cycle RIE / OR Charge Capture Team – February 2018

Approval:

Kevin Albosta

Kevin Albosta – Vice President/Chief Financial Officer

February 15, 2018

Date

