



Vendor Representative Access and Interaction Policy

Vendor Representatives can play an important role in a patient's care and may be present in The Christ Hospital Health Network ("TCH") facilities at the request of the attending physicians, surgeons, anesthesiologists, or appropriate hospital administrators. This policy serves to establish uniform guidelines for permitting Vendor Representatives access to TCH's operating rooms and associated areas, including but not limited to cath labs, hallways, physician offices, etc., so as to ensure reasonable control and identification of Vendor Representatives while ensuring safe patient care. A Vendor Representative is any representative such as, sales person, manager, liaison, account executive, contact, administrator, company technician, clinical support, nurse clinician, home healthcare personnel, manager, medical/scientific liaison of a manufacturer or company who visits TCH in any capacity, including but not limited to, soliciting, marketing or distributing information regarding the use of vendor products or services.

TCH Standards of Conduct and Professionalism

1. Treat all persons, including patients, families, visitors, employees, trainees, students, volunteers, and healthcare professionals with respect, courtesy, caring, dignity and a sense of fairness and with recognition of and sensitivity to the needs of individuals from diverse backgrounds (including gender, race, age, disability, nationality, sexual orientation and religion).
2. Communicate openly, respectfully and directly.
3. Encourage, support, and respect the right and responsibility of all individuals to assert themselves to ensure patient safety and the quality of care.
4. Promptly report adverse events and potential safety hazards and encourage colleagues to do the same.
5. Respect the privacy and confidentiality of all individuals. Adhere to all TCH policies and HIPAA regulations regarding personal health information.
6. Uphold the policies of TCH.
7. Utilize all TCH facilities and property responsibly and appropriately.
8. Conduct yourself in a professional manner while on TCH premises.

Vendor Representatives shall not, under any circumstances:

- Make unauthorized, unaccompanied visits to or loiter in any area of any facility within TCH.
- Introduce any new supplies or equipment (collectively, "products") for evaluation to any clinical personnel or entity prior to review and approval by TCH's Value Analysis Team. Failure to follow this policy may lead to immediate suspension. A formal process has been established for documentation of new product evaluations. TCH's Supply Chain Procurement will provide assistance with the required documents.
 - **Please Note:** Any use of unauthorized or unapproved products will not be reimbursed by TCH and will be considered a vendor donated item and no purchase order will be issued for it.
- Use cameras or audio/video recording devices to record an image and /or sound recording of a patient, hospital staff or visitor unless specific written permission has been obtained in advance.
- Discuss any confidential or patient information at any time either within or outside of TCH facilities.
- Review, search or otherwise gain access to patient or confidential information of any kind without the express permission and in the presence of a TCH staff member.
- Enter any inventory or supply room/area unless escorted by a member of the TCH staff.
- Access Physician Locker Rooms, Physician Lounges, or Employee Lounges unless authorized and accompanied by TCH department management.
- Attend any meeting where patient specific information, quality assurance activities or risk management issues are being discussed, unless authorized to do so.
- Operate any equipment or devices while being used on a patient without specific, explicit written authorization from a staff member.

- Touch patients at any time.
- Engage in the practice of nursing, surgery, or medical decision making.
- Use any TCH equipment and services including but not limited to computer work stations, telephone and fax machines.
- Sell or engage in selling without the involvement of a member of TCH's Supply Chain Procurement department. TCH reserves the right to refuse to pay for any product or service not authorized by TCH's Supply Chain Procurement. All contracts must be approved through TCH's contract approval process. Vendors are expected to comply with TCH's standard terms and conditions, which are available on its website. Any contract signed by anyone other than an officer, or their delegate, of TCH is not valid.
- Provide anything of value to a TCH employee that could influence or be perceived as influencing the judgment of the employee in the execution of his/her duties.
- Fail to disclose any apparent or perceived conflict of interest; specifically, any family, personal, or financial relationships.

Vendor Policy Violations

- TCH will handle any observed or reported vendor violation of a TCH policy (each incident, an "Occurrence") in accordance with the following guidelines. Vendors are advised that TCH, in its sole and absolute discretion, reserves the right to deviate from these guidelines as TCH sees fit.
- TCH, in its sole and absolute discretion, shall characterize each Occurrence as "Major" or "Minor" and address as described below.

Major Occurrences

- The following non-exhaustive list contains examples of behavior that TCH considers to constitute a "Major Occurrence":
 - Engaging in disruptive, unprofessional or inappropriate behavior while on TCH premises including but not limited to using profane and abusive language, practical joking, gambling, name-calling, yelling, fighting, or other disorderly conduct, etc.
 - Harassment/Discrimination including making inappropriate advances or verbal and/or physical contact, in violation of applicable laws, regulations, and TCH policies
 - Reporting to TCH facilities under the influence of any intoxicant, hallucinogen, or narcotic.
 - Unauthorized use of TCH property.
 - Unauthorized possession of a deadly weapon on TCH premises.
 - Smoking in non-designated areas.
 - Theft, willful damage, waste, or loss of TCH property.
 - Fraudulent unauthorized or illegal business practices, including falsification of records or alterations of documents.
 - Violation of Security Access/trespassing on TCH property.
 - Breach of confidentiality obligations under applicable laws, regulations, and TCH policies.
 - Any criminal activity.
 - Inappropriate physical contact with anyone.
 - Failure to follow any TCH policy.

TCH Supply Chain Procurement finds behavior that constitutes a Major Occurrence to be completely unacceptable and reserves the right, in its sole and absolute discretion, to immediately remove and permanently bar any vendor representative or vendor company in the event of a Major Occurrence.

Minor Occurrences

- "Minor Occurrence" is an incident that is less severe than a "Major Occurrence" and that does not pose an imminent risk or threat to TCH's safety or ability to provide quality patient care or reputation. Examples of a Minor Occurrence would include: parking in a non-designated vendor parking area, entering a TCH facility via the main entrance as opposed to a vendor-designated entrance, visiting a TCH staff member's office without an appointment,

etc. In general, TCH will follow the steps set forth below but may, in its sole discretion, take such appropriate action as it deems necessary under the circumstances.

- 1st Occurrence – A written documentation of the incident will be filed at Supply Chain Procurement offices, with copies sent to the vendor representative involved and his/her immediate superior. The document will state that if the incident reoccurs, the involved Vendor Representative may be barred from the institution for sales marketing activities.
- 2nd Occurrence – A letter will be sent to the involved Vendor Representative's immediate superior with a copy to the Vendor Representative's senior sales and marketing officer informing them of the second occurrence. The involved Vendor Representative may be barred from TCH facilities, in TCH's sole and absolute discretion. Should it be decided the transgression warrants such a decision, another Vendor Representative may be substituted so as to continue the vendor/institutional relationship. The Vendor Representative's superior will notify Supply Chain Procurement staff immediately of the substitute representative.
- 3rd Occurrence – Upon the third Occurrence, Supply Chain Procurement will schedule a meeting with an executive of the vendor to formally inform the vendor that a subsequent Occurrence will result in removal of vendor from the TCH Approved Vendors status list for a minimum of ninety (90) days. Additionally, any existing contracts or bids under construction may, in TCH's sole and absolute discretion, be considered null and void during this period. Depending on the severity of the violations, Supply Chain Procurement may permanently bar the involved Vendor Representative from any of the TCH premises. TCH security will be notified to deny access and or remove the Vendor Representative on TCH property and to contact law enforcement, if necessary. The involved Vendor Representative's superior will be notified of such action.