

		Policy Title:	Corporate Vendor Policy & Procedures
Effective Date:	February 1, 2019	Policy Number:	SC-0110
Review Date:	January 21, 2019	Section:	Corporate Supply Chain Management
Revised Date:	January 10, 2019	Oversight Level:	Corporate
Administrative Responsibility:		Corporate Director, Supply Chain Management	

1. Purpose

- 1.1. To protect the privacy and safety of our patients and ensure that we provide the highest quality service possible.
- 1.2. To minimize interruption of patient care and staff productivity.
- 1.3. To ensure that all McLaren Health Care (MHC) subsidiaries conduct all business with Vendors with the highest ethical standards intended to protect patient confidentiality, and ensure appropriate and cost-effective use of medical devices, supplies, service and equipment and pharmaceuticals.
- 1.4. To require Vendors that conduct business with MHC subsidiaries to complete a certification process and act in accordance with all established MHC policies and guidelines.

2. Scope

- 2.1 Applies to all Vendors who are selling a product and/or service including those that provide medical devices, supplies, pharmaceuticals, service and equipment. Admittance to any of the locations to any of the MHC subsidiaries by a Vendor is a privilege, not a right.
- 2.2 Applies to MHC and its subsidiaries. All employees, physicians, residents, and trainees are required to adhere to this policy. It is the responsibilities of MHC subsidiaries to ensure that Vendors and staff are knowledgeable and compliant with this policy.
- 2.3 Applies to all Vendors, including those involved in patient care procedures where their presence may be necessary in an advisory capacity.
- 2.4 Applies to Vendors providing training or in-service on supplies or equipment as it relates to their presence in procedural areas.

3. Definitions

- 3.1.** Vendors are any representative of a distributor, manufacturer, or any other company, who visits for the purpose of soliciting, marketing, or distributing products or information regarding the use of medical devices, supplies, services, pharmaceuticals, and equipment.
 - 3.1.1.** This does not apply to service relationships that require an on-site presence as a condition of providing the contracted service. Such services must be documented by a written contract i.e. ATOS, Morrison Health, IT service providers, contractors/repairs, auditors, attorneys, etc.
- 3.2.** MHC Pharmacy policies include drug use guidelines, formularies, and utilization management initiative approved by MHC.
- 3.3.** Vendor Certification is the process to qualify a Vendor who wants to come onsite a MHC subsidiary. The certification and educational process will include but not be limited to MHC policies and procedures, privacy regulations, conflict of interest and HIPAA requirements. Vendor will acknowledge the understanding of MHC policies which must be completed as part of this process.
- 3.4.** Staff is defined as all employees, managers, directors, administrators and employed physicians.
- 3.5.** Service is defined as purchased services or repair service to facilities or equipment.
- 3.6.** Patient care areas are defined as areas or departments where patients are present and/or PHI may be present. Examples of patient care areas include operating rooms, pharmacy, sterile processing, etc.

4. Policy

- 4.1.** Vendors that interact with MHC are required to comply with all applicable MHC patient care, privacy, pharmacy guidelines, health requirements, research integrity, HIPAA, Code of Conduct requirements, and follow the practice procedure requirements of this policy.
- 4.2.** Vendors who visit any McLaren subsidiary more than 4 times per year are required to register and complete the certification process before visiting MHC subsidiaries.
- 4.3.** It is the responsibility of the MHC subsidiaries to ensure that Vendors and staff are knowledgeable and compliant with these guidelines.
- 4.4.** Staff members are required to uphold the highest professional standards in interactions with all Vendors.
- 4.5.** Enforcement of this policy and ongoing monitoring is the responsibility of all staff.

4.6. Staff is required to report all violations of this policy to their Department Head and Supply Chain.

4.7. Violators of this policy will be subject to the following disciplinary action (also listed in Section 5.10 Compliance and Disciplinary Action):

4.7.1. **1st Offense:** Rep will be given a written warning.

4.7.2. **2nd Offense (for the same type of violation):** Rep will be suspended from visiting all McLaren facilities, and the Vendor will be asked to provide a new Rep to service McLaren's needs.

5. Procedure

5.1. General Guidance

5.1.1. Vendors are only permitted to visit MHC subsidiaries by an approved appointment set up through the PremierPro Security Dashboard. Employees and physicians are under no obligation to grant appointment requests. Vendors cannot drop in without an approved appointment.

5.1.2. If the Vendor is visiting more than 4 times per year, they must go through the certification process.

5.1.3. Request for appointments must be made by calling ahead prior to the requested day and creating an appointment request in the PremierPro Security Dashboard. Product or service to be discussed must be identified at the time the appointment is made.

5.1.4. Should unanticipated patient care requirements arise, the appointment may need to be rescheduled. The Vendor will respect the decision to cancel and reschedule at another time.

5.1.5. Vendors will be required to check in and check out at the designated check in and check out area(s) at the respective subsidiary.

5.1.6. Vendors must obtain a PremierPro Security identification badge to be allowed on site. The PremierPro badge must be clearly displayed at all times during the visit. Badges must be obtained through PremierPro Security upon completion of registration. Badges will be used to check in and out of appointments.

5.1.7. Vendors can bring associates with them. If the associate has not registered to be certified (see section 5.2 Certification process), he/she must sign in and receive a temporary Vendor Guest paper badge. If the associate is visiting more than 4 times per year, he/she must get registered through PremierPro Security.

- 5.1.8. Vendors must not solicit procedure or patient volumes or competitive cost information from MHC staff or physicians. This information may only be shared with a Vendor with the approval of Supply Chain Management.
- 5.1.9. Staff and physicians may not share pricing, internal reports, communications, agendas, minutes, or other documents intended for internal distribution with Vendors.
- 5.1.10. Pricing comparisons are frequently misleading since the ultimate cost of supplies is dependent on many factors, including contracted discounts and rebates. Therefore, only pricing/cost information that has been approved by Supply Chain Management and/or Pharmacy may be discussed and only upon the request of the administrative or clinical department leader. No contracts under any circumstances may be given to or signed by staff.
- 5.1.11. MHC reserves the right to limit the number and duration of time a Vendor can visit an MHC subsidiary.

5.2. Certification Process:

- 5.2.1. Vendors are granted access to MHC locations as a privilege not a right.
- 5.2.2. Vendors interested in visiting a MHC subsidiary must be knowledgeable to all applicable MHC policies and requirements including those addressing privacy and confidentiality. Vendors who will visit more than 4 times per year are required to successfully complete a certification process through PremierPro Security prior to scheduling any appointments.
- 5.2.3. The Vendor must pay a non-refundable annual fee to PremierPro Security to cover the cost of providing the education, certification and associated ongoing compliance monitoring. The annual fee will be evaluated on a periodic basis.
- 5.2.4. Certification will be conducted online through the PremierPro Security dashboard.
- 5.2.5. The Vendor will be required to confirm that they have reviewed and agree to comply with the policies therein through the PremierPro Dashboard.
- 5.2.6. Once the certification process has been successfully completed, a PremierPro photo identification badge will be shipped to the Vendor. The Vendor is required to check in and out at the designated scanning station with their PremierPro identification badge, provided the Vendor has a scheduled appointment.
- 5.2.7. Vendors must be recertified on an annual basis and pay the annual fee.
- 5.2.8. Vendors will have online access through the PremierPro Security dashboard to all applicable Supply Chain Management and other MHC policies.

5.2.9 The following actions will occur if a Vendor submits a positive drug screening result for ANY drug:

5.2.9.1 McLaren Supply Chain Manager will contact the company to notify them of the Vendor's positive drug screen and will ask to determine if the Vendor is eligible to a re-test.

5.2.9.2 If the company would like the Vendor to re-test, a temporary replacement Vendor will be asked to fill in until the re-test results come back.

5.2.9.3 If the re-test results are negative, the original Vendor can resume his/her relationship and visitation with McLaren. If the re-tests results are still positive, a new Vendor will be asked to take the original Vendor's place.

5.2.10 Vendors are subject to random drug screening requests from McLaren Health Care at the Vendor's expense.

5.3. Patient Care Procedure Area Requirements:

5.3.1. Vendors who are allowed in patient care areas during procedures with the consent of the patient, physician, and the manager in charge to protect patient privacy and safety Vendors must adhere to the following criteria:

5.3.1.1. As part of the certification process, Vendors must provide a letter of competency from their employer that states that the Vendor has had the qualified training to supervise procedures utilizing the described company equipment/tools and/or the ability to train others in the use of their product.

5.3.1.2. Vendors that will access patient care areas need to provide documentation for the following, which complies with JCAHO standards:

5.3.1.3. TB - Tested within the last 12 months (PPD recommended)

5.3.1.4. Varicella (Chicken Pox) - 2 vaccinations or titer of demonstrating immunity

5.3.1.5. Measles - 2 vaccinations or titer demonstrating immunity

5.3.1.6. Mumps - 2 vaccinations or titer demonstrating immunity

5.3.1.7. Rubella - 2 vaccinations or titer demonstrating immunity

5.3.1.8. Tetanus-Diphtheria-Acellular Pertussis (TDAP vaccine only required for representatives visiting obstetrical and nursery units)

5.3.2. Vendors will wear attire (e.g., scrubs or cap), designated by McLaren when in patient care areas.

5.4. Vendor Access:

5.4.1. Vendors must enter wearing their designated PremierPro Security photo ID at all times while on MHC premises and check in and check out at the designated area(s) of the facility by scanning their badge. Badges must always be worn and clearly visible from the waist up.

5.4.1.1. Any Vendor who has not checked in and entered through the designated area will be considered in violation of the policy. Supply Chain Management will notify the rep to leave and will issue a written warning.

5.4.1.2. An exception may be made to certain contracted Vendors that are delivering supplies and equipment for clinical procedures. For example, Orthopedic Implants and Cardiac Rhythm Management devices.

5.4.1.3. These type of vendor reps will only be allowed access to these departments for the sole purpose of delivering supplies and equipment for the clinical procedure. Any other sales related discussions would require the vendor rep to register with PremierPro and have an approved appointment as shown in 5.1.1 General Guidance.

5.4.1.4. Vendors will be required to scan their PremierPro badge to properly sign out before leaving the facility.

5.4.1.5. Vendors that do not enter the building are not required to check in or wear a badge. I.e. Lawn Care Vendors.

5.4.1.6. Violation of this will result in disciplinary action shown in Section 5.10 Compliance and Disciplinary Action.

5.4.2. Vendors are prohibited from entering patient care areas within MHC subsidiaries including but not limited to the Emergency Department, Operating Room, Cardiac Interventional Areas, other interventional areas, patient care units, outpatient clinics, clinic staff rooms, and any staff or physician lounges.

5.4.2.1. An exception to this is when a Vendor is:

- Required for training on new equipment or devices already purchased by the MHC subsidiary (refer to 5.3).
- Operating Room and other clinical areas exceptions where Vendor's presence is required to assist physicians or necessary to develop competency with the device or equipment. These instances will be prescheduled as part of the OR boarding process and/or preapproved by the department Head.

5.4.3. Vendors shall only use those areas in the facility designated for visitor use.

5.5. Displays

5.5.1. Other than specifically allowed for in this section, Vendors are not permitted to display products or product information within any MHC subsidiary.

5.5.2. Vendors cannot place information in mailboxes of staff or post Supply Chain on bulletin boards within any MHC subsidiary.

5.5.3. Displays may be allowed adjacent to meeting rooms in conjunction with approved MHC CME courses, approved research symposia or other education activities if:

5.5.3.1. The course director approves having commercial displays.

5.5.3.2. Placement is not a condition of providing support.

5.5.3.3. Vendor does not engage in any sales activity within the area that the education is occurring.

5.5.3.4. Displays are consistent with policies endorsed by the Accreditation council for CME Standards for Commercial Support.

5.5.3.5. Pharmaceutical displays must be approved by the Director of Pharmacy and must be consistent with the subsidiary approved drug formulary.

5.5.4. Displays may be allowed in staff lounges for training if approved by the Department Head.

5.6. Promotional Activities:

5.6.1. Cash or other incentive programs are strictly prohibited at any MHC subsidiary.

5.6.2. Breakfast, lunch or dinner may be provided by a Vendor only as part of an educational session.

5.6.3. Vendors are not permitted to distribute, post, or leave any type of unsolicited printed or handwritten material, advertisements, signs or invitations at any MHC subsidiary.

5.6.4. Vendor-sponsored raffles, lotteries, or contests, which result in gifts to the winner, are forbidden.

5.6.5. Promotion of drugs against established drug formularies are strictly prohibited. Vendors who discuss such agents will be suspended from visiting MHC subsidiaries pending review of the event. If the Vendor is found in violation of any policy, the ability to visit any MHC location will be suspended for a

minimum of one month. Repeated and flagrant violations can result in indefinite suspension of privileges for the individual and, if necessary, the company.

5.6.5.1. Sample medications will not be accepted from Vendors unless the practice has received approval through the Special Cause Variation process.

5.6.6. Preprinted prescription pads from Vendors are not permitted at any MHC subsidiary.

5.7. Gifts/Grants

5.7.1. No personal gifts from Vendors of any kind are permitted at any MHC subsidiary or to any staff members.

5.7.2. Textbooks and items of educational value may be provided to the institution if approved by the department chair/director and consistent with Conflict of Interest policies.

5.7.2.1. The standards of Commercial Support of the Accreditation Council for CME addresses institutional responsibility, handling of funds, and reasonableness of payments, disclosure, and other issues.

5.7.3. Unrestricted educational grants should go through the Foundation.

5.7.4. If the subsidiary does not have a Foundation, the grant should go through the department head.

5.8. Donations and Solicitations:

5.8.1. Support of any physician or staff CME activities must be made through the Chair or Department Head and the Department of Graduate Medical Education.

5.8.2. Physicians may attend Non-CME educational events during off-hours with the approval of the respective CEO.

5.8.3. Donations to MHC are to be coordinated through the respective subsidiary Foundation and Vendors should contact this area directly if they are interested in making a donation.

5.8.4. If the subsidiary does not have a Foundation, donations are to be coordinated through the respective Department Head.

5.8.5. MHC staff that would like to solicit donations from Vendors for any non-CME departmental activities, supplies, functions, events, fundraisers; equipment, etc. should contact their respective Foundation.

5.8.6. The Office of the Foundation will contact the Vendor and solicit the request on the behalf of the subsidiary.

5.9. Confidentiality:

5.9.1. Vendors shall not attend programs in which specific patients are discussed or when quality assurance or risk management issues are presented.

5.9.2. Preceptorship programs (programs for the education of Vendors) involving contact with, discussion of, or observation of individual patients, requires the advance consent of the patient and approval of the Department Head.

5.9.3. Any outside surgeon or physician brought in by a Vendor attending a clinical procedure will need to sign a confidentiality agreement and get the patient's approval and the medical staff's approval for the procedure.

5.10. Compliance and Disciplinary Action

5.10.1. Staff Responsibilities:

5.10.1.1. All staff is responsible for assuring that Vendors comply with this policy. Vendors in violation of this policy are to be immediately reported to the Department Head and Supply Chain Management. Supply Chain Management is responsible for contacting the Compliance Officer.

5.10.1.2. Security may request to inspect a Vendor's PremierPro Security identification badge. Vendors without proper identification badges will be escorted to the appropriate area and given information regarding certification. Uncooperative Vendors or those in violation of policies will be escorted off premises.

5.10.1.3. The Compliance Officer and Supply Chain Management will investigate any reported violations of this policy.

5.10.1.4. Vendors who violate policies are subject to loss of visitation privileges at MHC subsidiaries. There will be no refunds of fees associated with Vendor credentialing.

5.10.1.5. The Compliance Officer and Supply Chain Management will report all Vendor disciplinary action to the Department Head and the Chief Executive Officer.

5.10.1.6. If a Vendor does not adhere to this policy; the following actions will be taken:

- **1st Offense:** Rep will be given a written warning and the Vendor will be notified.

•**2nd Offense (for the same type of violation):** Rep will be suspended from visiting all McLaren facilities, and the Vendor will be asked to provide a new Rep to service McLaren.

5.10.1.7. Staff found not to be in compliance with this policy will be reported to their supervisor for disciplinary action. Depending on the severity of the situations, discipline up to and including discharge may be warranted.

5.10.1.8. Non-employed physicians that are in violation of the policy will be reported to the Department Chair and/or the Medical Executive Committee for suggested action.

6. References

6.1. Please refer to the following additional Supply Chain Management and Compliance policies:

6.1.1. MHC_Consignment Policy

6.1.2. MHC_Corporate Value Analysis and Premier Surpass Policies

6.1.3. MHC_CC0128_Medication Samples and Special Cause Variation Requests

6.1.4. MHC_Placement Policy

6.2. McLaren Credential Requirements Checklist

6.3. Physician Payment Sunshine Act - Transparency Reports and Reporting of Physician Ownership or Investment Interests (42 CFR Parts 402 and 403); Final Rule; February 8, 2013.

6.4. PhRMA Code and AdvaMed Code on interactions with healthcare professional

6.5. Standard for Commercial Support, Accreditation Council for continuing Medical Education, 2014

7. Appendix

7.1. Vendor Policy FAQs

Approvals:

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January 21, 2019

Date

David Mazurkiewicz
Senior Vice President, CFO

Previous Revisions: January 10, 2019

Supersedes Policy: Sales and Service Representatives and any and all Subsidiary Vendor
Policy & Procedures

McLaren Vendor Credential Requirements Checklist

CREDENTIALS	DESCRIPTIONS	Non-Patient Care Areas*	Patient Care Areas**
VENDOR & COMPANY INFORMATION			
BACKGROUND CHECK	A national "criminal" background check and sex offender check will be performed by Premier Pro Security Services annually. A valid driver's license is needed to run these checks. We will not accept an attestation letter from your company.	PROVIDED BY Premier Pro Security Services	PROVIDED BY Premier Pro Security Services
GOVERNMENT WATCH LIST (OIG, EPLS & Medicaid by state)	A national government watch list check. Premier Pro Security Services checks to ensure that you and your company are not on any government watch lists. This check is performed monthly by Premier Pro Security Services.	PROVIDED BY Premier Pro Security Services	PROVIDED BY Premier Pro Security Services
GENERAL LIABILITY INSURANCE	Proof of your company's General Liability Insurance including limit amounts of \$1 million each occurrence and \$2 million general aggregate, policy effective and expiration dates. Green Security, 300 Langner Rd. Suite 200, West Seneca, NY 14224, must be listed as the "Certificate Holder" for notification purposes.	Required	Required
IMMUNIZATION CREDENTIALS			
EMPLOYEE DRUG TEST (10 PANEL)	Pre-Employment drug testing to be completed by a licensed laboratory. Actual results are required; letters of attestation will not be accepted. The 10 substances are cocaine, marijuana, PCP, amphetamines, opiates, benzodiazepines, barbiturates, methadone, propoxyphene, and quaaludes.		Required
TUBERCULOSIS SKIN TEST (PPD)	TB test with negative results is required. If you have a positive TB test, further documentation is required. This includes either a chest x-ray (within 5 years) with no signs of active TB, accompanied by a symptom review or physician questionnaire/letter. All test documentation expires annually.	Required	Required
INFLUENZA	Annual current influenza vaccine which can be administered typically from August through March. An updated flu vaccine is required for each year. The time frame for meeting this requirement is November 1, 2018 to March 31, 2019.	Required	Required
HEPATITIS B	Proof of a 3-shot series of vaccinations. Documentation must include a date and clinic contact information. Clinics and/or doctor offices may draw blood to test for positive antibodies. Blood titers must be signed by a physician, NP, PA, or RN for approval.		Required
MEASLES, MUMPS & RUBELLA (MMR)	Proof of 2 doses of MMR vaccination or titer showing immunity. Documentation must include a date and clinic contact information. Clinics and/or doctor offices may draw blood to test for positive antibodies. Blood titers must be signed by a physician, NP, PA, or RN for approval.	Required	Required
VARICELLA	Proof of 2 doses of Varicella vaccination, titer showing immunity or proof of disease history. Documentation must include a date and clinic contact information. Clinics and/or doctor offices may draw blood to test for positive antibodies. Blood titers must be signed by a physician, NP, PA, or RN for approval.	Required	Required
TETANUS, DIPHTHERIA & PERTUSSIS (Tdap)	Proof of a Tdap vaccination. Documentation must include a date and clinic contact information.	Required	Required
TRAINING/COMPETENCY CREDENTIALS			
POLICIES & PROCEDURES	Vendor Policy, Standards of Conduct, Medication Samples and Special Cause Variation Requests Policy, Contractor Education Booklet	Required	Required
POLICIES & PROCEDURES - Standards of Conduct Form	Review and agree to Standard of Conduct Acknowledgement Form	Required	Required
POLICIES & PROCEDURES (LOCATION SPECIFIC)	Review and agree to Access & Confidentiality Agreement for Non-Employees Form	Required	Required
BLOODBORNE PATHOGENS	Proof of bloodborne pathogens training	Required	Required
HIPAA TRAINING	Proof of HIPAA training	Required	Required
PRODUCT & SERVICES TRAINING	A list or description of product and/or service training you have received from your company. Please provide a certificate of training or letterhead signed by your manager or superior.	Required	Required
ASEPTIC TECHNIQUE TRAINING	Proof of aseptic technique training	Required	Required
ORP PROTOCOL	Proof of OR protocol training	Required	Required
CONTRACTOR/COMPETENCY CREDENTIALS			
BONDS & INSURANCE	Individual's proof of fulfillment of the required bonds and insurance per project at the request of hospital.	Required	Required
CERTIFICATIONS, LICENSES & TRAINING	Individual's proof of all trade certifications, licenses and all company training.	Required	Required
INSERVICE & PROCEDURES	Individual's completion of any mandatory and customized policy & procedures, safety training, work hours, parking, use of the facility and any other project related requirements.		
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*Non-Patient Care Area - Vendors that don't require access to patient areas or areas where PHI may be present.

- Examples include but not limited to Accounting, Administration, Human Resources, Marketing, Security, Supply Chain, etc.

**Patient Care Area - Vendor requiring access to patient care areas or areas where PHI may be present.

- Examples include but not limited to Operating Room, patient floors, Cath Lab, Sterile Processing Department, Pharmacy, Medical Lab, etc.

**McLaren Health Care
Corporate Vendor Policy
Frequently Asked Questions**

1. Why do we need a Vendor policy?

The Vendor policy establishes requirements and processes needed to:

- a. monitor and control access by Vendors to MHC subsidiaries to protect patient safety and privacy;
- b. comply with government rules to verify businesses and representatives are not excluded from federal programs (sanction screening); and
- c. eliminate, as much as possible, any distraction and/or inappropriate influence resulting from the offering of gifts and food by Vendors and acceptance of these by MHC employees.

2. Why do Vendors need to register and be certified by PremierPro Security?

The registration and certification process allows us to educate Vendors and their representatives on our policies and standards of conduct while at MHC. For example, HIPAA Rules, patient rights and responsibilities, etc.

3. What information does the representative need to provide when they register?

If a representative will be in patient care areas, they will be required to provide documentation stating they have been trained and are competent to represent their product or service. They also will need to provide immunization records. Other examples are training certificates, driver's license, and other supporting materials requested by PremierPro Security.

4. Does this policy cover all staff and physicians?

Yes, like all MHC policies, all staff and employed physicians are expected to support and comply with this policy. Non-employed physicians will be encouraged to support this initiative too.

Appointments and Check In

5. How do Vendors make appointments?

Registered Vendors may directly call the person they wish to see and schedule a date and time. The Vendor is responsible for obtaining an approved appointment through their PremierPro Security account. The McLaren Facility Admin and/or Facility User specified in the Vendor's appointment request must approve the appointment in order for the appointment to be valid. The Vendor will check in by scanning their PremierPro Security badge at the QR scanner.

- If the Vendor forgets their PremierPro Security badge, a temporary paper PremierPro Security badge can be printed at the main PremierPro Security registration station.

6. What about Vendors who make appointments with non-employed physicians? Example: If an Ortho implant Vendor meeting in the OR takes place with a physician after a case, will the Vendor be required to make appointment through the PremierPro Security site?

Yes, the Vendor will need to create an appointment with the appropriate department head, so the appointment can be validated through the PremierPro Security website by the department head. Vendors will be expected to leave the department and hospital immediately following their appointment.

7. Where will the Vendor check in area be?

Each subsidiary will have a Vendor check in area located in the main lobby. QR scanners will also be available in various departments for ease of entrance for approved appointments.

8. The Vendor's manager is riding with them today. Must they go through the Registration and Certification process?

No, but they will be required to check in as a "vendor guest" and receive a temporary paper badge as long as the representative they are riding with has a valid appointment. Vendor guest passes can be used up to 4 times per year before having to fully register through PremierPro Security. Using more than 4 vendor guest badges per year will result in a violation.

9. I want to ask a new Vendor to come in regarding a new (non-pharmaceutical) product; does the Vendor need to go through the Certification and Registration process?

No, but they must check in and receive a vendor guest paper badge. If this will be an ongoing relationship, they will be required to go through the Certification and Registration Process. New Vendors will only be allowed to receive 4 vendor guest badges.

10. What if I have an emergency situation, and the company or representative is not registered with PremierPro Security?

Vendors will be allowed to provide services under emergency situations. They will be required to register if they will be having an ongoing relationship with us.

11. How do we handle Vendors who come into the hospital after normal business hours?

Typically, these Vendors are there to deliver supplies or equipment for a specific patient procedure or provide repair services. Each subsidiary will have a designated scanning station for Vendors to check in and out. Appointments in PremierPro can be altered to the appointment needs.

Badges

12. Who will be eligible for a permanent McLaren badge and who is eligible for a PremierPro Security badge?

Permanent McLaren issued badges are no longer used for Vendors (Vendors defined in section 3.1 and 3.1.1). If permitted, Vendors that deliver supplies and equipment may be eligible for a McLaren permanent badge, such as orthopedic implant Vendors or cardiac rhythm device Vendors. They will be allowed access to the facility only for the purpose of delivering their products. If they wish to make a sales call, they will have to make an appointment with the department manager and follow the Vendor Policy.

13. Can I have a designated support person to manage my appointments: can someone other than myself access the PremierPro Security website to add my appointment?

Yes. Facility Administrators can approve appointments on behalf of a Facility User.

14. MMG sites and other clinics do not have access to print badges; will we be required to purchase printers?

No. If the Vendor forgets their PremierPro Security badge, a temporary paper PremierPro Security badge can be printed at any regular printer.

15. Vendors that call on off-site non-patient care areas such as Corporate Services. Will they be required to check in and get a badge?

Yes, they are required to make an appointment through PremierPro Security and have it approved by the McLaren Facility Administrator and/or Facility User.

Gifts

16. Will Vendors be allowed to sponsor/fund department Christmas parties?

No. Vendors may provide breakfast, lunch or dinner only as part of an educational session.

17. What if our subsidiary policy allows for acceptance of gifts up to \$40 can I accept these gifts?

No. The policy states that no personal gifts of any kind are permitted. The Corporate Vendor policy supersedes a subsidiary policy.

18. Are pens, pencils and notepads considered personal gifts?

No. Personal gifts are tickets, business lunches, and other items that may influence business decisions.

Confidentiality

19. Is it ok to share supply volume with a Vendor? Example Pharmacy information with drug rep.

Yes, with the approval of Supply Chain Management. However, under no circumstances do we want to share our confidential pricing with any Vendor.

20. Can information be shared on a patient procedure with a Vendor who needs to bring in supplies or equipment for the case?

You may share this information with the Vendor under these circumstances.

Education

21. Can a Vendor bring in food for an educational session?

Yes. Education sessions scheduled at a provider office or clinic must be attended by the physician.

22. Is an in-service considered an educational session?

Yes. Any type of information or training provided by a Vendor to enhance the knowledge and skills of our staff is considered education.

23. Are educational programs (teleconferences or live speakers) offered by Vendors still permitted?

Yes. Vendors may offer to fund educational activities that are controlled, planned and approved by MHC Department Head or Department Chair. The selection of the speakers and assurance of the educational content of the program is the responsibility of the Department Head or Department Chair.

Promotional Activities

24. Sometimes radio stations or other local businesses donate gifts to be raffled to employees. Can we accept these gifts?

Yes. If the donation is coordinated through the Foundation and there is no obligation or expectation of providing business to the donor. And the raffle is held by the subsidiary and not the donor.

25. What about Vendors that fund or sponsor newspaper advertising?

No, this will not be allowed.

Displays

26. We sell display tables to Vendors; can we continue to do this?

Yes, a donation may be made to the Foundation for this activity. Donations for display tables may only be made in conjunction with CME courses and other education activities. Products to be displayed must be approved by the Director of Pharmacy or Supply Chain Management.

Fund Raisers

27. A Vendor buys a table or golf tickets; can an employee attend the event?

Yes, as long as it is a MHC sponsored event. The employee must document this and declare it on the annual Conflict of Interest Survey.

Speaking Engagements

28. I have been invited to speak at a Vendor sponsored conference, the Vendor will pick up the travel and hotel expenses; may I attend?

Yes, your Vice President and Corporate Supply Chain Management must approve the Engagement based on the content of the meeting and status of active corporate initiatives that may involve the Vendor. Foundation honorarium received from the Vendor must be given to the respective subsidiary.

Site Visits

29. We want to visit another customer site to see equipment used in a live application, the Vendor will pay all expenses; may I attend?

Yes, based on approval from your Vice President and Corporate Supply Chain Management. Corporate Supply Chain Management has developed guidelines for site visits.

Violations of the Policy

30. What are some Vendor violations to the policy?

A few examples are:

- Vendor does not have proper credentialing and comes onsite to a McLaren facility.
- Vendor tries to see someone without an approved appointment in the PremierPro Security dashboard.
- Vendor goes to other departments without an approved appointment and tries to solicit pricing information.

31. What are some employee violations to the policy?

A few examples are:

- An employee tries to solicit gifts or food.
- An employee shares confidential pricing.
- An employee allows Vendors to come in without appointments.

32. How do I report violations of employees, physicians or Vendors?

Contact your Department Head and Supply Chain by phone or by e-mail. They will investigate and take the appropriate corrective action for the employee or physician. They will contact the Compliance Officer to participate in corrective action with the Vendor.

How can I help with this new process and policy?

- 33. Explain to staff, physicians, and Vendors that there is a new policy and procedure for Vendor visitation and conduct.**
- a. If you see a Vendor without a PremierPro Security badge, ask them if they have checked in and direct them to the designated check in site. If they do not cooperate, call Security and Supply Chain for assistance.

 - b. In patient care areas that require scrubs, make sure the Vendor is dressing in McLaren approved scrubs and has a visible PremierPro Security badge on.