



MAURY REGIONAL MEDICAL CENTER

POLICY: To establish a procedure for communicating with vendors, defining guidelines for vendor activities, and identifying vendor disciplinary actions for infractions of Maury Regional Medical Center (MRMC) policies and to provide vendors with information necessary in order to conduct business with MRMC. It is also in place to assist in protecting our staff, visitors and patients.

SCOPE

This policy is intended for Maury Regional Medical Center personnel and its vendor representatives including Pharmaceutical vendor representatives. Vendor representatives include all salespersons, representatives, or other employees of manufacturers, distributors, suppliers and service organizations, intended for use or purchase by Maury Regional Medical Center.

POLICY

- 1) Maury Regional Medical Center is instituting a Vendor Access Management Program (VAMP) that includes feedback received from Vendor Representative surveys.
- 2) This Vendor Access Management Program (VAMP) entitles qualifying Vendor Representatives to:
 - a. A permanent MRMC/Vendor badge with their picture, name, company name and year of renewal.
 - b. Ability to e-mail or call into Supply Chain to approve their appointments.
 - c. Efficiency of going directly to and from their appointment without the requirement of stopping in Supply Chain to sign in/out each visit.
- 3) The VAMP applies to all “long-term” or “frequent” Vendor Representatives. Each Vendor Representative must visibly wear their permanent vendor badge to conduct business at MRMC.
- 4) All “long-term” or “frequent” Vendor Representatives must pay a \$50 annual processing fee for access to VAMP (*renewable January 1st*).
- 5) Vendor badges are granted to a Vendor Representative with a company. If the Vendor Representative changes companies that they represent, Vendor Representative must apply for a new badge referencing the new company. This will be treated as a new request and all information must be submitted along with paying a new annual processing fee. No refunds or partial credits will be given. Vendor Representative must turn in the old badge to Supply Chain.
- 6) VAMP participants must follow all other requirements of the MRMC Vendor Policy.
- 7) All “short-term” or “one-time” Vendor Representatives must wear a temporary MRMC vendor badge from Supply Chain to conduct business at MRMC.
- 8) All temporary MRMC vendor badges must be returned to Supply Chain upon completion of that visit’s meeting. Failure to do so will prevent future access within MRMC until failure is resolved. Supply Chain will track temporary badges and follow up on all badges not returned within 24 hours. All exceptions to this requirement must be approved by the Director Supply Chain.

- 9) Vendors Representatives who need access to Surgery or other areas of MRMC, when requested by MRMC representatives, in an emergency or after hours must have their company name badge visible and notify Supply Chain of their presence as soon as possible.
- 10) Vendors who need items sterilized for MRMC cases must have these items at MRMC by 1:00 p.m. the day before they are to be used. Implants must be in the MRMC Operating Room at least 48 hours in advance of the case. A list of contents for all items for sterilization must be presented to the O.R. staff upon arrival.
- 11) Bio-Medical Engineering is required to check all patient-specific electrical equipment before use.
- 12) For off-site ambulatory facilities and physician practices where vendor badges are not available, the Vendor Representative must clearly wear an identification badge from their respective company.
- 13) All Vendor Representatives must have a prescheduled appointment with the specific individual at the facility where they are conducting business.
- 14) All Vendor Representatives will coordinate the presentation of new products, services, and equipment through Supply Chain for consideration at a Product Value Analysis Committee (PVAC) meeting or will notify the appropriate Purchasing Agent of specific inquiries/requests made by MRMC representatives.
- 15) All Pharmaceutical Representatives will coordinate the presentation of new medications and services through Pharmacy Administration. All other meetings to discuss medications should be coordinated and approved through Pharmacy Administration. Pharmaceutical Vendors are not allowed to promote non-formulary medications within MRMC.
- 16) All service technicians, construction workers, and other non-MRMC persons providing services will report to the respective hospital's Plant Operations and Construction areas as appropriate. All will abide by MRMC's policies regarding identification badges and logging into and out of the department for time tracking purposes.
- 17) Plant Operations and Construction will provide all contracted vendors performing services on MRMC premises with a short-term vendor badge and a copy of the VAMP policy. If contractor is on campus long-term he must purchase a permanent picture badge.
- 18) All contracted vendors performing services on MRMC premises must provide documentation as appropriate with regard to the service including licenses and certificates of insurance.
- 19) Invoices for products shipped to any MRMC entity without a bona fide purchase order from the Purchasing department will not be paid.
- 20) All vendors must notify the Purchasing agent of any and all device recall & warranty credits.
- 21) All vendors must immediately notify the Director Supply Chain of inclusion to the OIG and or Excluded Providers List.

PROVISIONS

1. All Vendor Representatives must abide by the following guidelines while visiting or conducting business at Maury Regional Hospital:
 - a. All Vendor Representatives will conduct business at the MRMC on a scheduled appointment basis only.
 - b. If the Vendor Representative desires another appointment within the MRMC central campus, he/she must call Supply Chain to approve the additional appointment.
2. Supply Chain will obtain the signature of the Vendor Representative and their management on the Vendor Representative Letter of Understanding and Confidentiality Agreement

acknowledging that they have received a copy of the Vendor Policy & Procedure. MRMC Supply Chain will maintain this information on file.

3. Supply Chain staff will provide vendors with the following information:
 - a) Purchasing hours.
 - b) Vendor's role:
 - i. Product evaluation
 - ii. Contact with hospital personnel
 - iii. Bids and proposals
 - iv. Service levels
 - v. Solicitation guidelines
 - vi. Gratuities policy
 - c) Handling of purchase orders and invoices.

3. The following contraventions of Maury Regional Medical Center policies will result in disciplinary action against a business partner:
 - a. Minor infractions:
 - i. Failure to obtain and/or wear a vendor's badge.
 - ii. Calling and/or visiting Maury Regional Medical Center personnel who have no expressed interest in their products, services, or capital equipment.
 - iii. Accessing MRMC facilities to conduct business without a scheduled appointment or prior authorization from the respective Department or Supply Chain. A vendor badge must still be obtained.
 - iv. Failure to obtain a purchase order number before shipping products, services, and/or capital equipment into MRMC, including items for trial and evaluation purposes.
 - v. Failure to maintain service levels:
 - a) Shortages on a consistent basis
 - b) Over-shipments on a consistent basis
 - c) In-services inadequate
 - d) Catalogs and price lists not current
 - e) Communication lines not maintained
 - f) Vendor representatives non-responsive to hospital needs
 - g) Shipping products to wrong locations
 - vi. Failure to honor prices quoted.
 - vii. Failure to provide resources and necessary documentation to maintain account in good standing:
 - a) Failure to provide invoices, copies of invoices, or proof of delivery, upon request.
 - b) Failure to reconcile outstanding account issues within 90 days of invoice date.
 - c) Unauthorized use of credits to offset open invoices.

 - b. Major infractions:
 - i. Failure to ship the specified product, service, or capital.
 - ii. Failure to go through Supply Chain (i.e. back-door selling tactics).
 - iii. Failure to provide adequate safeguarding of protected health information.
 - iv. Offering unethical inducements to MRMC personnel.
 - v. Failure to notify Supply Chain of product recalls.
 - vi. Harassment of MRMC personnel (i.e. inappropriate language and/or physical actions).
 - vii. Failure to provide required VAMP paperwork as well as appropriate shot records as applicable.

5. Pursuant to the Health Insurance Portability & Accountability Act (HIPAA), Maury Regional Medical Center prohibits the use or disclosure of protected health information of its patients without a valid authorization, or unless that use or disclosure is otherwise permissible. Therefore, to the extent any MRMC vendor comes in legitimate contact with a patient's protected health information, he/she is prohibited from any use or disclosure of that information which is inconsistent with this, or any other MRMC policy, or as prohibited by state and federal law. MRMC shall, in its sole discretion, determine what constitutes a valid authorization, or what is, or is not otherwise permissible should a conflict arise between MRMC and one of its vendors.
6. The progressive steps in the disciplinary action process may be waived and escalated by the Director Supply Chain if the vendor commits a major infraction (i.e. endangering patient care, threatening bodily harm to an MRMC employee).
7. A vendor representative will provide Supply Chain the necessary data to maintain a current vendor profile.
8. Purchasing will review the performance of all vendors and initiate the following disciplinary actions if applicable. Violations of this policy will result in the following:
 - a. Minor Infractions
 - i. For first occurrence, a documented oral consultation of vendor representative.
 - ii. For second occurrence, letter to vendor and vendor representative's immediate supervisor.
 - iii. For third occurrence, letter to vendor district/regional manager from Director Supply Chain to arrange a meeting to discuss the issues.
 - b. Major Infractions
 - i. For first occurrence, a documented oral consultation of vendor representative by Director Supply Chain and a letter to vendor district /regional manager.
 - ii. For second occurrence, letter to president of vendor company from the Director Supply Chain detailing the issues and requesting immediate resolution.
 - iii. Termination of relationship if the issues remain unresolved.