
SYSTEMWIDE POLICY

Supplier Representatives

This Policy is Applicable to the following Spectrum Health sites:

SYSTEMWIDE

Big Rapids, Continuing Care, Corporate, Gerber, Ludington, Outpatient/Physician Practices, Pennock, Priority Health, Reed City, SH GR Hospitals, SHMG, United/Kelsey, Zeeland, Lakeland

Applicability Limited to:	N/A
Reference #:	3563
Version#:	12
Effective Date:	10/08/2020
Functional Area:	Supply Chain/Purchasing
Department Area:	Administrative, Clinical

1. Purpose

This policy establishes requirements and standards for Supplier Representatives when doing business with Spectrum Health as well as guidance for when recourse with a Supplier Representative is necessary.

2. Definitions

Supplier: Any third-party organization that supplies materials, goods or services to Spectrum Health.

Supplier Representative: An employee, agent or representative of a Supplier including, but not limited to, consultants, sales representatives, service technicians and technical support personnel.

Patient Care Area: Any portion of a Spectrum Health facility wherein patients are intended to be examined or treated.

Patient Care Facility: Includes Spectrum Health hospital facility, Spectrum Health Medical Group facilities and any other Spectrum Health facility in which patient care is provided.

In-Service Education: A pre-planned, pre-arranged group presentation that may include physicians, pharmacists, nursing staff or other health care providers in which training is applicable.

3. Responsibilities

Supplier Representatives

All Supplier Representatives will adhere to Spectrum Health policies and will abide by local, state and federal laws and any other regulations including HIPAA (Health Insurance Portability and Accountability Act) and those made by any regulatory body such as The Joint Commission, CHAP, CARFF, and all other regulatory standards of practice. If a Supplier Representative is suspended or terminated from Spectrum Health, it is the responsibility of the Supplier to provide adequate coverage and backfill.

Printouts of this document may be out of date and should be considered uncontrolled.

Spectrum Health Team Members

It is the responsibility of all Spectrum Health team members, including medical staff, who interact with Supplier Representatives to comply with this policy and to report any Supplier Representative who violates or attempts to violate this policy to the appropriate sourcing specialist or buyer.

Sourcing Department

It is the responsibility of the sourcing department to investigate, record and administer supplier reprimands. As appropriate, sourcing will collaborate with the legal and compliance departments.

4. Compliance**Spectrum Health Team Members:**

Failure to comply with this policy or report violations made by Supplier Representatives may result in performance correction up to and including termination.

Supplier Representatives:

Level 1 Violation: First written warning email documenting violation sent to Supplier Representative and their upline.

Level 2 Violation: Suspension of the Supplier Representative for a period up to three months.

Level 3 Violation: Termination of access of the Supplier Representative.

Supplier:

Any violations of this policy may affect future Supplier relations with Spectrum Health, at Spectrum Health's sole discretion.

5. Policy**Requirements Applicable to All Suppliers and Supplier Representatives for All Spectrum Health Locations, including Patient Care and non-Patient Care Facilities:****Meeting with Spectrum Health Team Members**

All Supplier Representatives must have a scheduled appointment with a specific individual. Unscheduled visits are not permitted. Regardless of appointment status, all Supplier Representatives must check in prior to proceeding to the individual's office or work area. Meetings with Suppliers are to be conducted by Spectrum Health team members in their respective office or designated areas. Meetings should be held during normal business hours. Supplier Representatives should be escorted by a Spectrum Health employee and not left unattended.

Privacy and Confidentiality

Supplier Representatives must be compliant with Federal Health Insurance Portability and Accountability Act (HIPAA) regulations related to protecting and keeping confidential Protected Health Information (PHI). Unauthorized access to and/or inappropriate use of patient information is strictly forbidden.

Product Delivery

Prior to any electrical equipment being brought on site for trial or purchase, the equipment must be inspected and approved for use by Clinical Engineering (otherwise known as Bio-Med) or Maintenance. Supplier should contact their designated procurement representative to determine the department and designee that will be responsible for conducting the inspection. Loading and unloading arrangements must be made with the appropriate department beforehand. Suppliers must abide by Spectrum Health's parking policies and procedures at all times.

Conflicts of Interests

Supplier Representatives shall disclose any actual or perceived conflict of interest in their business relationship with Spectrum Health to all involved Spectrum Health team members, ensuring a

thorough description of the influence the potential conflict may have on the product or service sourcing process. Specifically, any family, personal, or financial relationships that may exist between the Supplier Representative and Spectrum Health or its team members must be disclosed.

Additional Requirements Applicable to Suppliers and Supplier Representatives for All Patient Care Facilities and Clinical Staff Interactions:

Meeting with Clinical Staff

Supplier Representatives must schedule appointments with physicians through the medical staff office or the physician office. Supplier Representatives may not enter any patient care or administrative areas without a scheduled appointment.

New Products

Supplier Representatives shall present all new products and technological improvements to procurement before presenting them to other Spectrum Health physicians/team members. New products will be reviewed by Spectrum Health value analysis team or an alternative review committee, as determined by Spectrum Health. Supplier Representatives are required to obtain a purchase order for all goods and services prior to delivery including, but not limited to, equipment and product trials.

Post Case Billing

Supplies approved for use in surgical procedures may require a post case purchase order. Supplier Representatives are required to submit a request for purchase order in a timely fashion in accordance with the following:

- Purchase order requests are due by noon the next business day after the procedure was completed.
- For cases occurring on Friday, Saturday, and Sunday, PO requests are due by noon on Monday.
- For cases occurring on holidays (New Year's Day, Memorial Day, 4th of July, Labor Day, Thanksgiving, and Christmas), POs are due by noon on the following business day.

If a Supplier Representative does not submit a request for purchase order in a timely fashion, Spectrum Health may withhold payment to Supplier.

Patient Care-Related Services

It is acknowledged that a limited number of Supplier Representatives may be specifically requested by Spectrum Health staff or physicians, pursuant to a Spectrum Health policy or procedure, to be involved with Spectrum Health staff's or physician's provision of hands-on patient care via (i) conducting staff or physician training, (ii) consulting with staff or physicians concerning a specific patient, or (iii) calibrating a device (collectively, "Patient Care-Related Services"). Patient Care-Related Services may only be provided upon compliance with the below criteria.

Patient Care-Related Services must, at all times, be conducted under the supervision, direction and responsibility of a licensed Spectrum Health healthcare professional or physician.

Only Supplier Representatives providing Patient Care-Related Services may enter nursing units or patient Care Areas within Spectrum Health for business purposes and then, only by appointment or with authorization by the department management. Suppliers shall complete the authorized business task and immediately leave the area and return to registration. Suppliers are not authorized to enter staff or physician lounges or proceed into other offices or areas without prior authorization.

Use of any device to record or transmit audio and/or take photographic images or videos are strictly prohibited.

Prior to entering a Patient Care Area, or providing Patient Care-Related Services, a Supplier Representative must sign into the supplier access system as instructed per section 6 below. Minimum requirements for access to Patient Care Areas include proof of all required vaccines, including but not limited to, Chicken Pox, Hepatitis B, MMR, TB and influenza. Other requirements such as proof of relevant training, proof of liability insurance, proof of drug screen, criminal background check and acceptance of Spectrum Health policies will be communicated via the supplier access system.

Suppliers are not allowed to operate any equipment for a procedure unless it is explicitly stated in an active and executed contract. Suppliers are permitted to calibrate programmable devices under the direction of the attending physician. These devices include, but are not limited to, pacemakers, internal cardiac defibrillators, nerve stimulators and lasers.

Patient consent should be obtained and documented in the patient's medical record regarding the presence and role of the Supplier Representative, if that person will be present during treatment, care, or a clinical procedure.

Suppliers will be solely responsible for personal and professional belongings brought into Spectrum Health.

Education

In-Service Education may be scheduled through the pharmacy, patient care department, or operational department with the approval of the department designee (and the pharmacy for medication-related in-services). If a meal is provided, please see the Gifts and Business Courtesies policy for additional expectations of all staff. [Gifts and Business Courtesies](#)

6. Facility Access and Identification

Spectrum Health Hospital Group, including surgical sites, uses a supplier access system. All Supplier Representatives must sign in and print a Supplier identification badge from the supplier access system. This badge must be worn in plain sight. If a Supplier Representative has a permanent Spectrum Health issued badge, the Supplier Representative is still required to sign into the supplier access system. All Supplier Representatives are also required to wear their company identification badge. The sign-in process will print a badge with the date, amount of time in the facility, individual to be visited, Supplier Representative's name and company. Supplier Representatives will also be required to comply with any specific departmental registration processes that may exist in addition to the supplier access system.

Non-hospital sites (i.e. physician groups, designated pavilions, and health plan sites) requires all Supplier Representatives to wear their company badge when entering any facility for appointments. The Supplier Representative is required to check in at the front desk area for the appointment. Supplier appointments must be scheduled in advance with each department visited.

7. Revisions

Spectrum Health reserves the right to alter, amend, modify or eliminate this policy at any time without prior written notice.

8. Policy Development and Approval

Document Owner:

Amy Bertotti (Mgr, Value Analysis)

Writer(s) (formerly Author):

Fred Nagel (Spec, Sourcing Sr)

Reviewer(s):

Adam Post (Dir, Surgical Business Ops), Amy Bertotti (Mgr, Value Analysis), Andrea Pouloupoulos (Dir, Supply Chain Sourcing), Anne DeWys (Dir, Employee Relations), Burton Smith (Dir, Information Services), Charles Block Jr (Mgr, Plant Operations), Emily Bailey (Mgr, Supply Chain Sourcing), John Polakowski (Spec, Sourcing Assoc), Kristen Sinke (Dir, Value Analysis), Molly Nolan (Mgr, Sys Org Risk Mgmt), Patrick Repins (Dir Sr, Financial Reporting), Ryan Mix (Mgr, Surgical Svcs Operations), Travis Barkel (Dir, Supply Chain Sourcing), William Selles (Dir Sr, Procurement)

Approver:

Christina Freese Decker (President & CEO)

9. Keywords:

representative, supplier, supplier representative, vendor, vendor representative, harassment, purchasing, supplies, in-service, products, new technology, department designee, code of excellence, equipment, pharma, pharmacy, device, gifts, conflict of interest, conflict