

ADM-1255: Vendor / Supplier Facility Relations

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| Sub-Process: | Vendor Management | Activity: | Vendor Management |
| Job Roles: | SC CEO, SC COO, SC CFO, SCD, ORMM, ORMC, ORSCT, DCRD, CRD, SCT, CLMM, CLSCT, DDORSC, DCSD | | |
| Purpose: | To provide guidance and instructions for sales representatives/vendors who are doing business, or intend to do business with HealthTrust Supply Chain and/or in any HCA Healthcare facility. It is also intended for hospital personnel to assist in understanding how to effectively interface with sales representatives within HCA Healthcare standards and requirements. | | |
| Rationale: | Vendors and facilities must understand what is expected from each side when a vendor would like to do business with an HCA Healthcare facility. | | |
| Impact / Value: | Consistent treatment of vendors and facility personnel alike | | |
| Related Documents: | Example Letter Vendor Data Sheet EDHP Log | | |
| Policy: | <p>A. HealthTrust Supply Chain is an HCA Healthcare entity and as such supports and gives priority to HealthTrust (HT) National Agreements for supplies, equipment, technology and services.</p> <p>B. HealthTrust contracted vendors must first meet with the CRD, DCRD or DCSD to evaluate a new product and follow the Supply Chain review and approval process before meeting with facility stakeholders.</p> <p>C. Vendors without a HealthTrust Contract must first meet with the DCRD or DCSD to evaluate the product. When a product has unique characteristics and a similar product is not on contract, then supply chain may decide to vet the product through the value analysis process.</p> <p>D. Vendors without a HealthTrust contract and wishing to do business with HCA facilities must reference the following website for the process for submitting information for evaluation: www.healthtrustpg.com.</p> <p>E. Only vendors approved to be in the facility as part of a procedure, to perform service or maintenance on equipment, to install new equipment or update software are allowed in HCA Healthcare facilities. The DCRD/DDORSC may approve vendor education on newly approved product if deemed necessary by division and facility leadership. If the product is on contract, the CRD may approve education.</p> <p>F. Vendors who refuse any health screening upon entry into the facility or refusal to wear appropriate PPE must not be allowed in the HCA Healthcare facility.</p> <p>G. It is incumbent upon each vendor to comply with this policy in all respects. Failure to do so must be reported to the sales representative's company and to HealthTrust. Violation of this policy may result in permanent debarment from doing business with the facility, division, or company.</p> | | |

Facility Responsibility:

- A. All facility and supply chain employees are tasked with adhering and complying with Ethics and Compliance policy EC.023, as well as, policies related to the introduction, evaluation, and purchase of products.
- B. Additionally, Supply Chain employees must only accept samples in quantities required for trial purposes.

Supply Chain Director Responsibility

- A. Each Supply Chain Director must gain access through their eDHP/VPRO administrator to run, print, and review the DHP Visit Report by the 15th of each month for the previous month's visit.
- B. The Supply Chain Director must review the visit report to include Supplier Representative/Managers for unknown vendors or suspicious activity inconsistent with scheduled procedures and/or facility operations.
- C. All unknown vendors or suspicious activity must be reviewed with the responsible Department Heads for legitimacy and annotated on the printed report.
- D. All illegitimate or unauthorized vendor visits must be reviewed with hospital leadership and with the vendor to determine if there is adequate justification for the visit and if the vendor will be authorized continued access to the facility.
- E. The Supply Chain Director must sign and date their EDHP/VPRO log noting that they have reviewed the monthly DHP Visit report. Annotations must be made on the report and retained for one year either in paper or digital form.
- F. The Supply Chain Director must notify Division Supply Chain leadership of any vendor or vendor personnel banned from the facility as a result of the Edhp/VPRO review.

Required Facility Procedures:

- A. Sales representatives/vendors must follow the facility/division check-in and any screening procedures immediately upon entry into an HCA Healthcare facility.
Facility procedures must include:
 - 1. Pre-scheduled appointment is required, except in emergent situations
 - 2. Appropriate area to park upon arrival.
 - 3. Appropriate place to check-in and request an audience with Supply Chain.
 - 4. An electronic vendor tracking system must be utilized for credentialing and/or badge access.
 - 5. Appropriate security procedures (i.e. badge/ID that identifies the individual as a vendor/supplier representative or colored scrubs / bouffant cap).
 - 6. Appropriate waiting area if the appointment is delayed.
 - 7. Appropriate areas to conduct business (i.e. non-patient areas).
 - 8. HCA Healthcare Contract Compliance statement and the appropriate introduction of items into facilities.
 - 9. Appropriate processing of After Hours or Emergency Orders.
 - 10. Vendor must follow Ethics and Compliance Policies for their company.

Sales Representative Badges:

- A. All sales representatives/vendors must wear the appropriate form of identification, such as badge or nametag, as indicated by the facility policy even when their own company ID is worn.
- B. All sales representatives/Vendors must comply with wearing the badge, or they will be required to leave the facility.

Appointments:

- A. All sales representatives/vendors must not be seen without an appointment. Appointments must be made in advance. Drop-ins or "cold calls" must not be seen unless there is an urgent or compelling reason

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- B. Sales representatives/vendors who do not comply must be asked to leave the facility.
- C. Sales representatives/vendors who do not comply must be reported to the DCSD by the SCD/CRD.

Product Introductions, Changes and Upgrades:

- A. Sales representatives/vendors must introduce any new, changed or upgraded products through the Division Clinical Resource Director (DCRD) prior to introducing any product to a facility.
- B. Sales representatives/vendors must make an appointment with the DCRD prior to arriving at the Division Supply Chain office or before visiting a facility.
- C. DCRD product approval allows the sales representative/vendor to make an appointment with the facility Clinical Resource Director or Supply Chain Director. Since it is neither possible, nor necessary to meet with every sales representative, sales representatives desiring to introduce products as previously outlined, must provide product literature to the CRD indicating the clinical and/or financial benefits of the product, and why the facility should consider its use.
- D. Additionally, the information must indicate whether or not the product is included in a current valid HealthTrust contract and provide the contract number.
- E. The CRD must review the product information with the DCRD and appropriate Department Directors and follow policy [SEM-2215 New Product and Technology Introduction and Approval Process](#).

Products for Surgical and Procedural Cases:

- A. All products required for Surgical and Procedural cases must be pre-approved by Supply Chain
- B. All items utilized in a procedure must be removed from the facility within 24 hours post the procedure.
- C. Products that are not owned or consigned by the facility must not be stored at the facility..
 - 1. Stored vendor-owned supplies at a facility for future usage that is not part of a consignment agreement or dedicated for use in a scheduled case.
 - 2. For cancelled cases, vendor-owned supplies must be picked upon returned to vendor within two (2) business days
- D. All items used during a case must be on a Vendor Billing Sheet within 24 hours after completion of the procedure.
- E. All sales/vendor representatives must arrive at least thirty minutes prior to the scheduled case.
- F. Supply Chain must ensure that supplies brought in for a surgical or procedural case are properly listed and priced upon completion of the case.
- G. All appropriate hospital vendor forms must be completed by the vendor per OR-2036 (e.g. orthopedics, pacemakers, ect.). The form MUST be complete and submitted with 24 hours of the procedure – No additions will be made to the PO after submission.
 - 1. Supply Chain must notify the Facility CFO, sales representative supervisor, and HealthTrust via the Healthtrust Member Portal when sales representative/vendors fail to comply with the 24-hour rule.
- H. Invoices must be submitted within 20 days from the date of the procedure. The invoices(s) MUST match the applicable PO(s) issued to the vendor for the above referenced case (i.e. multiple PO's require multiple invoices). The preferred method of invoice submission is EDI. IF this is not available, submit invoices by email to the appropriate CSC.
- I. The ORMM/ORICC must ensure all items listed on the Surgical Billing Sheet remain in the facility and are used on or implanted in the patient.
- J. All Surgical/Procedural Vendors participating in surgical/procedural procedures must participate in the Time-Out. All members of the surgical/procedural team must

participate in the positive verification of the patient, the intended procedure and the visualization for the marked site of the procedure.

K. The following vendors are permitted to participate in cases in the facility:

1. General Facility

- a. New or high risk service line procedure
- b. New product or equipment education or trials
- c. Product quality concerns
- d. Vendor for equipment maintenance or repairs

2. Surgical and Procedural Access

- a. New service line, product and trials
- b. Trauma
- c. Spine, neuro, navigation (Mazor), neuromonitoring, neurostimulators
- d. Ortho, navigation (Makko)
- e. AAA stents, TAVR, Watchman, Mitraclip
- f. Contracted Vendors for Laser and Neuromonitoring

3. Cath and EP Lab

- a. EP Mapping and ablation, CTO
- b. Permanent pacemaker, placement, ICD, CRT
- c. Peripheral Vascular
- d. Impella, EP device checks and reprogramming

4. Interventional Radiology

- a. Stroke procedures, neurocoils
- b. Fistula

L. The following Vendors are Not Allowed to participate in OR Cases and must be directed to Division Supply Chain

- 1. Pharmaceutical – DVPRx
- 2. Lab – DCSD
- 3. Commodity – DCRD

Purchase Orders

- A. The Purchasing Department personnel are the only authorized representatives of the hospital allowed to commit hospital funds, and to place purchase orders.
- B. Sales representatives/vendors must not order on behalf of the facility, except those using a Bill Only Ordering system (i.e. IPM).

Product Decisions

- A. Value analysis teams are comprised of facility executives, key department directors, clinicians, and the supply chain representative must make the final decision as to whether a product is accepted or rejected.

Non-Contract Vendors

- A. Compliance with HealthTrust contracts is mandatory for each HCA Healthcare facility. As a result, introduction and/or use of non-contract commodities may be reviewed when a HealthTrust product category does not exist.
- B. The fact that a company is negotiating with HealthTrust is not sufficient to use a product. HCA Healthcare will not consider noncontract products when a HealthTrust contract product exists for a similar product.
- C. If a facility contract is required, it must be approved through the value analysis process.
- D. Sales representatives/vendors from non-contract companies and/or selling non-contract products are allowed in the facility by appointment, after division approval by the DCRD or DCSD.

Contract Vendors

Contract Vendors

- A. HealthTrust Supply Chain must comply with contracts to the extent indicated on the contract (sole source, multi/dual-source and optional vendor contracts).

Business Requirements/Conditions

- A. Vendors desiring to do business with the facility must provide the following for all products to be considered for use in the facility if requested:
 - 1. Product literature.
 - 2. Published information on clinical/technical evaluations, and product trial results.
 - 3. Price lists.
 - 4. Cost comparisons and analysis to establish financial feasibility of product use
 - 5. In-service training/education for all clinical units, departments and staff involved.
 - 6. The facility may request a list of hospital references (hospitals currently using the product, equipment or service).
 - 7. Vendors must identify consignment opportunities for items being introduced to the facility.

Product Trials

- A. Vendors who have received approval to "trial" specific products within the facility must comply with the following requirements:
 - 1. Provide sufficient product to conduct an appropriate evaluation of the product.
 - 2. Provide in-service training/education for all staff involved in evaluating trial products. Training must be coordinated by the vendor in advance through the facility Education Department and with the SCDor CRD, after approval has been received to trial the product.
 - 3. Provide evaluation forms in advance of the trial to help determine efficacy of trial.
 - 4. Provide assistance and guidance, and monitor and document the progress of the trial.

Vendors Code of Conduct:

- A. Vendors must:
 - 1. Comply with this policy in all cases. If there are questions or concerns, the sales representative/vendor must address them with the SCD or CRD. The sales representative/vendor must supply their business card to the SCD/CRD.
 - 2. Honor and support facility decisions regarding product selection or non-selection.
 - 3. Be on time for all scheduled appointments.
 - 4. Assist the facility in all aspects of converting the facility to the vendor's product, if the product has been approved for trial or use. This includes guidance, instruction, in-service, labor, technical advice and expertise, as the facility deems necessary.
 - 5. Ensure that no new, or changed products are introduced into the facility without first gaining approval from the value analysis team as outlined previously.
 - a. Any new or unapproved items brought into the facility will be at no charge to the facility and the patient will not be billed for the item.
 - b. Only approved items will be reimbursed to the Sales representative/vendor.
 - c. Sales representatives/vendors who represent multiple distributors/manufacturers are not to upsell during the case (i.e. ortho vendors cross marketing pharmaceuticals)

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6. Vendor representatives must not be allowed in any hospital department without approval and a prior appointment. Ensure that all equipment brought into the facility for trial, installation, or temporary use must be inspected by the Bio-Medical Engineering Department prior to issue and use.
7. Follow facility policy regarding the use of cellular phones.
8. Understand and adhere to facility code of conduct.
9. Understand the facility's privacy policy as it relates to HIPAA.
10. Understand the facility's Emergency Codes, and respond appropriately.

B. B. Vendors must not:

1. Use any facility locations for sales calls, unless by previous appointment. No "cold" sales.
2. Intentionally undermine the facility in anyway, or for any reason with doctors, patients or facility personnel.
3. Use the facility to gain market share at the expense of the facility, or other HealthTrust contract vendors.
4. Provide free, or at-cost product or product samples directly to facility employees without prior authorization by the SCD or CRD. Samples must never be provided directly to staff or patients by vendors under any circumstances.

References:

[EC.023](#)

Effective:

06/09/03

Revised:

05/27/20

Reviewed:

05/27/20

Business Owner:

Chris Mitchell

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