

SYSTEMWIDE POLICY

Supplier Policy

This Policy is Applicable to the following Corewell Health sites:

SYSTEMWIDE

Continuing Care, Corewell Health Beaumont Grosse Pointe Hospital, Corewell Health Beaumont Troy Hospital, Corewell Health Big Rapids Hospital, Corewell Health Dearborn Hospital, Corewell Health Farmington Hills Hospital, Corewell Health Gerber Hospital, Corewell Health Grand Rapids Hospitals (Blodgett Hospital, Butterworth Hospital, Helen DeVos Children's Hospital), Corewell Health Greenville Hospital, Corewell Health Ludington Hospital, Corewell Health Medical Group East, Corewell Health Medical Group West, Corewell Health Niles Hospital, Corewell Health Pennock Hospital, Corewell Health Reed City Hospital, Corewell Health Specialty Pharmacy, Corewell Health St. Joseph Hospital, Corewell Health Taylor Hospital, Corewell Health Trenton Hospital, Corewell Health Watervliet Hospital, Corewell Health Wayne Hospital, Corewell Health William Beaumont University Hospital (Royal Oak), Corewell Health Zeeland Hospital, Corporate, Hospital Outpatient Departments West, Priority Health

Applicability Limited to:	N/A
Reference #:	3563
Version#:	13
Effective Date:	01/16/2024
Functional Area:	Supply Chain
Department Area:	Supply Chain

1. Purpose

This policy provides clarity around expectations and responsibilities, as well as guidance around norms for Corewell Health team members, physicians, affiliated personnel, suppliers, and Supplier Representatives.

2. Definitions

- **Approved Display:** A supplier display approved pursuant to this policy that involves the distribution or provision of educational material solely on items or services accepted for use in CH facilities and/or formulary.
- **Buyer/Assistant Buyer:** Purchasing representative responsible for sourcing of requisitions to purchase orders, following up on delayed orders and managing the RMA process relative to returns.
- **Corewell Health (CH) team member:** Any person who is an employee, physician, resident, volunteer, fellow, student and/or affiliated person of or at CH or a CH entity.
- **Delivery Person (DP):** A person who works for a supplier but whose primary job is the delivery of goods and services. DPs often use loading dock as their point of entry to CH entities and deliver goods and/or services either to the loading dock or to an individual department.

Entities will reference associated Documentation contained within this document as applicable
Printouts of this document may be out of date and should be considered uncontrolled.

- **Design & Construction Services:** Limited to service firm Client Management personnel that provide design, construction, and installation services.
 - *Example:* A third party project manager hired to assist with architectural design.
- **Employed team member:** an individual on payroll who may also receive benefits, if eligible, directly from the organization; may also be referred to as *employee*.
- **Honor System:** An honor system or honesty system is a philosophical way of running a variety of endeavors based on trust, honor, and honesty. A principle that is governed by the "honor system" typically does not have strictly enforced rules.
- **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.
- **Non-employed team member:** an individual that does not receive payroll or benefits from Corewell Health, performs 'work' on behalf of the organization, and has physical (badge) access and/or logical (information system) access.
- **Patient Care Area:** Any place where patient or resident care may be offered, including, but not limited to, areas where patient-related conversations occur such as patient lounges, operating rooms, patient waiting areas, therapy areas, visiting areas, sitting rooms, hallways or corridors where patients wait for or receive treatment, areas in which patients are transported and nurse stations (regardless of whether patients or visitors are present because patient conversations regularly occur in these areas). With respect to lounges, waiting areas, visiting areas, admitting areas, sitting rooms, registration areas, hallways and corridors, this provision only applies during hours of operation when patients frequent the areas.
- **Patient Confidentiality and Information:** Patient health information (PHI) shall be protected, consistent with CH confidentiality and privacy rules as well as State law and federal Health Insurance Portability and Accountability Act (HIPAA) regulations.
- **Research Support Staff (RSS):** individuals who are under contract with, or employed by, a pharmaceutical or device company to assist with approved research. RSSs typically are present on site to monitor research or assist in orientation of CH Personnel involved with the research.
- **Regional Director of Graduate Medical Education (GME):** The Corewell Health associate responsible for administration of the graduate medical education program.
- **Service Representative (SR):** individuals that support the application or use of his/her company's products, or perform services associated with his/her company's products or services. The Service Representative may regularly on CH premises during the week. SRs are not primarily responsible for the sale of goods or services. SRs are required to schedule appointments, but due to the frequency of visits, may have the option to obtain a reusable Supplier Representative badge once they meet the requirements identified in this policy.
 - *Example:* A certified maintenance repair person responsible for performing quarterly on CT scanning capital.

Entities will reference associated Documentation contained within this document as applicable
Printouts of this document may be out of date and should be considered uncontrolled.

- **Sourcing Team Member**: Employees in a Sourcing buyer, contract specialist, Sourcing specialist or category manager, who are part of the Sourcing team.
- **Supplier**: Any third-party organization that supplies materials, goods, or services to Corewell Health.
- **Supplier Representative**: A salesperson, pharmaceutical representative, device representative, or person whose primary responsibility is to encourage the use or purchase of the company's products or services whom they are employed by.
- **Workday Strategic Sourcing (WSS)**: refers to Corewell Health's strategic Sourcing software platform used for strategic Sourcing requests, Supplier relationship management and most Sourcing Activities.

3. Compliance

Team Members are expected to take the time necessary to read and become familiar with the details of any policies that apply to them, as well as to follow any expectations outlined in the respective policies. It is at the discretion of the employee to seek clarification from his/her leader, or Human Resources HR, if needed. When policies aren't followed, performance correction or coaching may be required.

Corewell Health expects all Supplier Representatives to adhere to this policy. Compliance should be a top priority, however, in the event an incident occurs, a tiered, disciplined approach (See 3.1) will be followed.

- 3.1. The scenarios described below are examples of action that Corewell Health *may* take in response to a Supplier Representative's non-compliant behavior. The list is not intended to be comprehensive, nor does it limit Corewell Health's ability to act if an incident occurs that is not captured in the table below.**

***Note "(x)" to be determined by Clinical Operations Leader and Sourcing.**

	Definition	Examples of Offense
Written / Verbal Warning	Supplier Representative will be notified verbally, or in written form, of the warning by a member of the Corewell Health Sourcing or Purchasing team	<ul style="list-style-type: none"> – Appearing on-site without having a pre-scheduled appointment. Failure to schedule on-site visit. – Dress requirement violation – Solicitation/loitering with no viable reason to be onsite with Corewell Health team members. – Improper use of badge and/or access – Late submission of Implant Management System (IMS) documentation for payment; (after 24 hours) – Provide unapproved products to clinical staff for use, i.e., trunk stock

Suspension / Probation Period	Supplier Representative will be placed on a probation period of 15–60 days. Throughout the period of time determined, the Supplier Representative will not be allowed onsite	<ul style="list-style-type: none"> – 2* or more written or verbal warnings; (<i>*to be determined at the discretion of Corewell Health</i>) – Disrespectful behavior; (<i>i.e., arguing with providers, staff or in presence of team member</i>) – Wearing CH scrubs outside of CH facilities; (<i>i.e., wearing scrubs in parking lots, outdoor seating, etc.</i>)
Permanent Suspension / Expulsion	The Supplier Representative will be removed from Corewell Health's account. In response, an alternate representative may be requested, or the supplier relationship terminated	<ul style="list-style-type: none"> – 2* or more suspension/probation periods occur; (<i>*to be determined at the discretion of Corewell Health</i>) – Unapproved use of any device to take photos/video in an operating and/or patient rooms.

4. Policy

4.1. Supplier Representatives Responsibilities

4.1.1. All Supplier Representatives (SR)

All SRs will adhere to Corewell Health policies and will abide by local, state, and federal laws in addition to all HIPAA (Health Insurance Portability and Accountability Act) standards and laws governed by regulatory bodies such as The Joint Commission, CHAP, CARFF, and other regulatory standards of practice.

If a Supplier Representative's behavior or actions violates the [Compliance section](#) of this policy, the reprimand process (3.1) will be followed.

It is the responsibility of the Supplier to provide adequate coverage and backfill if a Supplier Representative is suspended or access is removed.

Use of any device to record or transmit audio and/or take photographic images or videos are strictly prohibited and will be cause for permanent suspension as a Supplier Representative at Corewell Health.

4.1.2. Corewell Health (CH) Team Members

It is the responsibility of all Corewell 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 team member or buyer. The violation will be recorded by the Sourcing team member or buyer in a credentialing tool or Workday Strategic Sourcing.

4.1.3. Sourcing Department

It is the responsibility of the Sourcing department to investigate, record and administer supplier reprimands. As appropriate, Sourcing will collaborate with Clinical/Operations, Legal, Security and Compliance.

Entities will reference associated Documentation contained within this document as applicable
Printouts of this document may be out of date and should be considered uncontrolled.

4.1.4. Minimum requirements to access to Patient Care Areas*

- Proof of all required vaccines; (*including, but not limited to, Chicken Pox, Hepatitis B, MMR, TB, and influenza*).
- Proof of relevant training
- Proof of liability insurance
- Proof of drug screen
- Criminal background check
- Corewell Health policy review and acknowledgement

***NOTE:** Requirements to be uploaded/stored in appropriate vendor management system (VMS): (Corewell Health East VMS is *Vendormate*. Corewell Health West/South VMS is *Intellicentrics*)

4.1.5. Accessing Patient Care Areas and Clinical Staff Interactions

Prior to entering a Patient Care Area, or providing Patient Care-Related Services, a Supplier Representative must sign into the vendor management system as instructed per the [Facility Access](#) section below.

If there is a desire or need to meet with CH clinical staff, Supplier Representatives must schedule appointments with staff members via the medical staff office or the physician office. Supplier Representatives may not enter any patient care or administrative areas without a scheduled appointment. If this occurs, clinical staff have the right to refuse entry and/or ask that the Supplier Representative exit the premises and reach out to schedule an appointment. CH clinical staff are required to report the violation to a Sourcing team member or buyer.

4.1.6. Patient Care Areas with Supplier Presence

Supplier Representatives may be granted admittance to a Patient Care Area only if the below guidelines are followed.

- An appointment is made in advance and authorization from the department management is obtained.
- Supplier Representatives should not enter staff or physician lounges or proceed into other offices or areas without the necessary authorization.
- At all times, Supplier Representatives must be under the direction and supervision of a licensed Corewell Health healthcare professional and/or physician.
- Supplier Representatives providing Patient Care-Related Services may enter nursing units or Patient Care Areas within Corewell Health for business purposes and only by appointment or with authorization by the department management.

If a Supplier Representative is present during treatment, care, or a clinical procedure, patient consent should be obtained in advance and documented in the patient's medical record.

Supplier Representatives are not allowed to operate any equipment during a procedure unless it is explicitly stated in an active and executed contract. Supplier Representatives are permitted, however, 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. In

addition, Supplier Representatives are not permitted to assist in patient care, i.e., moving patients, positioning patients, and/or opening of sterile product.

4.1.7. Supplier Representative Dress Requirements

- A supplier badge must always be worn.
- In areas in which scrubs are required, supplier shall wear CH issued*, or Supplier issued, scrubs.
- Other protective items, such as PPE, as defined by department and/or as directed by clinical operations leader, may also be required.
- Supplier Representatives working in areas in which scrubs aren't required must dress in a manner consistent with CH's dress code for the respective area.

***NOTE:** If protective attire is provided by CH, Supplier shall reimburse CH a fee to cover CH's cost for supplying the items. The fee may be set by a contract. CH may establish a Supplier Representative scrub color to clearly differentiate Supplier Representatives for identification purposes.

4.1.8. Specific Supplier Request

At times, a specific number of Supplier Representatives may be requested by Corewell Health staff or physicians to assist with the below:

- Conduct staff or physician training
- Consult with staff or physicians regarding a specific patient
- Calibrate a device; (collectively, "Patient Care-Related Services")

4.1.9. New Products

Supplier Representatives shall bring all new products and technological improvements to Corewell Health's Sourcing team before presenting them to Corewell Health physicians and non-Sourcing team members. New products will be reviewed by Corewell Health [Value Analysis Team](#) (VAT) or an alternative review committee, as determined by Corewell Health.

4.1.10. Purchase Orders (POs)

Supplier Representatives are required to obtain a purchase order (PO) 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. Products that are not approved to be used at Corewell Health may not be approved for payment. Suppliers may reach out to Sourcing to obtain a list of approved items.

Supplier Representatives are required to submit a request for purchase order in a timely fashion in accordance with the below guidelines:

Procedure completion Monday – Thursday	POs are <u>due by noon the next business day</u>
Procedure completion Friday – Sunday	POs are <u>due by noon the following Monday</u>

Procedures completed on a holiday <i>(New Year's Day, Memorial Day, 4th of July, Labor Day, Thanksgiving, and Christmas)</i>	POs are <u>due by noon on the following business day</u>
--	--

NOTE: If a Supplier Representative does not submit a purchase order request in a timely fashion, Corewell Health may withhold payment from the Supplier.

4.2. Education

In-service education may be scheduled through the pharmacy, patient care department, or operational department with the approval of the department designee and/or pharmacy for medication-related in-services. If a supplier meal is provided as part of the in-service education, Corewell Health team members should ensure they are in adherence with the respective company policy governing the acceptance of supplier meals.

- CH West and South team members should reference the [Gifts, Meals and Entertainment](#) policy.
- CH East team members, should reference [Conflict of Interest Policy](#)

Education meeting the requirements of professional organizations (e.g., approved Continuing Medical Education) may be offered. For accredited Continuing Education (CE) events, Accreditation Council for Continuing Medical Education (ACCME) standards for commercial support should be followed. All education sessions must identify attendees via a sign-in sheet specific to the educational session time, date, location, subject, and a detailed outline of the presentation and other material presented.

4.3. Promotions

4.3.1. Promotional Activities

Supplier's cash or other incentive programs directed at Corewell Health employees, medical staff members, residents or affiliates are prohibited.

4.3.2. Grants and Gifts

Suppliers may make gifts and grants in support of Corewell Health charitable endeavors. Such gifts should be made through the Corewell Health Foundations of Southeast Michigan, Southwest Michigan and/or West Michigan. Corewell Health reserves the right to refuse any such gifts and grants and reserves the right to direct the gifts in the least restrictive manner possible. Suppliers supporting such endeavors may be recognized either verbally or in writing at the start of the program. Rebates or credits from Suppliers will not be accepted as gifts.

Supplier gifts or grants should not be made during a purchasing transaction or be accepted in exchange for the purchase of services or goods from a Supplier. Such contributions are more likely to be considered discounts and should be properly addressed in the purchasing process. Any such offers should be reviewed with the Corewell Health East Reimbursement Office or the Corewell Health West/South Compliance function.

4.3.3. Corewell Health Prohibition for its Employees and Committee

Entities will reference associated Documentation contained within this document as applicable
Printouts of this document may be out of date and should be considered uncontrolled.

Corewell Health employees, independent contractors, and persons serving on Corewell Health committees responsible for pharmaceuticals, services, and goods selection and/or procurement (e.g., pharmacy and therapeutics) are expected to comply with this policy and shall not accept gifts or gratuities inconsistent with this policy or the Corewell Health policy on gifts and gratuities, whichever is more restrictive.

4.4. Supplier Diversity

Corewell Health's overall sourcing strategy supports the use of qualified and competitive diverse Suppliers. It is Corewell Health's practice to build relationships with diverse Suppliers capable of providing quality products and services at a competitive value.

4.5. Facility Access

The sections below are specific to Corewell Health West/South locations and Corewell Health East locations. A Supplier Representative must follow the site-specific instructions depending on which site they are gaining access to. Instructions will be further harmonized in the future when all locations leverage one enterprise third party supplier access system and credentialing tool.

4.5.1. Corewell Health West and South via IntelliCentrics

Corewell West and South locations, including surgical sites, utilize IntelliCentrics as their supplier access system. When onsite, the below requirements must be adhered to/upheld.

- 4.5.1.1.** Supplier Representatives must sign in and print a supplier identification badge from the supplier access systems or kiosk found throughout facilities. The sign-in process will print a badge with the date, duration of time allowed in the facility, employee overseeing the Supplier Representative's visit, as well as the Supplier Representative's name and company.
- 4.5.1.2.** The supplier identification badge must be worn in plain sight. If a Supplier Representative has a permanent Corewell Health West/South issued badge, the Supplier Representative is still required to sign into the supplier access system.
- 4.5.1.3.** Supplier Representatives, whether at a hospital or non-hospital site, are required to wear their company identification badge.
- 4.5.1.4.** Supplier Representatives are required to comply with any specific departmental registration processes that may exist in addition to the supplier access system.
- 4.5.1.5.** Supplier Representatives are required to both schedule an appointment in advance, as well as check in at the front desk area for their appointment.

4.5.2. Corewell Health East via VendorMate

Corewell Health East locations, including surgical sites, utilize Vendormate as their supplier access system. When onsite, the below requirements must be adhered to/upheld.

- 4.5.2.1. Supplier Representatives are expected to check in as directed by way of an automated system at each of the Corewell Health East sites and will be provided with a supplier identification badge.
- 4.5.2.2. Supplier Representatives are required to display a Corewell Health East supplier identification badge in the badge holder provided.
- 4.5.2.3. Honor System Badges, (badges that are produced on demand), may be issued by Corewell Health Security as deemed acceptable.
- 4.5.2.4. Honor System Violation: Supplier Representatives who have been found to have violated this policy by arriving without an appointment, failing to check in or check out, failing to return a Corewell Health East supplier identification badge or other offense in contradiction with Corewell Health East policies will be restricted from doing business with Corewell Health East.
- 4.5.2.5. In addition to general sign-in and sign-out, if required by the site pharmacy manager, pharmaceutical Supplier Representatives are to check in with the on-site pharmacy manager or team member.
- 4.5.2.6. Vendormate appointment override: Appointments for Supplier Representatives in failed status should only be approved in emergency situations in which patient care may be affected. All other overrides are not allowed. Corewell Health's Sourcing team members and buyers will monitor the overrides and may reach out to request justification.
- 4.5.2.7. Delivery Person (DP) Badge Exception: DPs are not required to obtain a Corewell Health East supplier identification badge but must have a company badge as described above.
- 4.5.2.8. Supplier Identification Badge Return: Corewell Health East badges are issued temporarily to Supplier Representatives and shall be returned at the close of the Supplier Representatives' meeting. If the badge is produced from an electronic "check in/check out" terminal, the paper badge is to be discarded upon exiting the Corewell Health East site. All individually issued Corewell Health East Vendor Rep (VR) badges must be forfeited to Corewell Health East in the event the relationship with the supplier is terminated.
- 4.5.2.9. Supplier Representatives are to return their badge holder to the respective marked bin and dispose of the badge when checking out at a workstation prior to leaving the building.

5. Exceptions

Chief Financial Officer.

6. Revisions

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

7. References

Corewell Health East Policies:

- [Conflicts of Interest Policy](#)

Corewell Health West/South Policies:

- [Gifts, Meals and Entertainment](#)

8. Policy Development and Approval

Entities will reference associated Documentation contained within this document as applicable
Printouts of this document may be out of date and should be considered uncontrolled.

Document Owner:

Alyssa Shull (Dir Supply Chain Bus Ops)

Writer(s):

Andrea Pouloupoulos (SVP, Supply Chain), Danielle Baldwin (Athletic Trainer), Emily Bailey (Dir Sr, Clinical Sourcing), Kristen Podein (Mgr, Category Supply Chain Sourcing), Matthew Verley (Operations Specialist)

Reviewer(s):

Adam Post (Dir Sr, Clinical Business Ops), Bart Berndt (Dir Sr, Surgical Clin Care Svcs), Burton Smith (Dir, Service Management), Jeremy Rusticus (Dir, Supplier Performance Mgt), John Shull (VP, Imaging), Kevin Vos (SVP, Facilities), Matthew Brinkman (VP, Security Services), Molly Nolan (Dir, Organization Risk Mgt), Patrick Droste (Mgr, Supply Chain Tech/Analytics), Sarah Doelee (Compliance Partner), Sarai Vanderwood (VP, Supply Chain Operations), Tyson Stewart (Dir, Imaging)

Approver:

Christina Freese Decker (President & CEO), Matthew Cox (Chief Financial Officer), William Selles (SVP, Supply Chain)

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