



## NORTHERN LIGHT HEALTH SUPPLY CHAIN STRATEGY

### Vendor Rules of Conduct and Access

*Northern Light Health views vendors as partners in support of our mission to provide the best products and services for our patients. Our team recognizes vendors as a key resource in supporting quality, cost effective solutions and technologies to provide the highest level of care to the communities we serve.*

Our vision is to create a supply chain support organization that has accountability for all supply chain resources, Our supply chain strategy seeks to reduce variation—as clinically appropriate and reasonable—in products, utilization, suppliers, and processes. This strict set of vendor rules has been developed to assist suppliers wishing to conduct business at Northern Light Health and to enhance patient confidentiality by limiting access to Northern Light Health facilities. In order to provide a safe environment and to maintain compliance with organizational procedures, guidelines or rules, vendors should abide by this document along with all federal and state laws, statutes, and regulations governing the industry.

### VISITING NORTHERN LIGHT HEALTH FACILITIES AND EMPLOYEES

Visitation to Northern Light Health facilities requires vendors to make an initial appointment with Supply Chain Management. Pharmaceutical vendors must make an appointment directly with the Pharmacy. For an appointment, Vendor representatives may contact the applicable Northern Light Health member main phone number and will be directed to the appropriate department.

Visitation of Northern Light Health facilities through the course of Supply Chain Management approved activities must be accomplished in a manner that does not impede patient care and is under the direction of the visiting department's management.

### Code of Conduct

Northern Light Health's Code of Conduct outlines the expected behavior and conduct for all Northern Light Health employees and vendors are expected to adhere to the same standard. The Sales Representative Code of Conduct Agreement is located on the vendor credentialing system. The Code of Conduct policy is located at <https://www.northernlighthealth.org/Legal/Vendor-Information>

Vendors are expected to report any suspected wrong doing, including safety concerns, immediately to the department manager. While on site, Company personnel shall adhere to the Northern Light Health Code of Conduct Policy.

### VENDOR RELATIONSHIPS

**Vendor expectations:** Vendors are not allowed to visit, email, or make cold calls to any Northern Light Health owned facility, department, nursing unit, or physician's practice until authorization has been granted by Supply Chain Management. Likewise, Northern Light Health employees are not allowed to contact vendors without going through Corporate Supply Chain Management.

**Vendor badges at Northern Light Health facilities:** All vendors and visiting representatives must completely register with our Vendor Credential and Compliance Monitoring System and complete required information prior to conducting business with Northern Light Health. All sales representatives will be required to sign in and wear a badge issued for that appointment. Badges must be worn at all times while on Northern Light Health's premises and displayed in a visible place for the duration of the visit. Failure to wear a badge may result in immediate disciplinary action and non-access. Northern Light Health will not conduct business with any vendor excluded, debarred, or ineligible to participate in federal or state health care programs such as Medicare and Medicaid, or whose officers, directors or employees are excluded from participating in federal or state health care programs. Vendors are responsible for taking all necessary steps to ensure employees involved in providing goods and services directly or indirectly, remain eligible to participate in federal and state health care programs. Register at: <https://registersupplier.ghx.com/reg/>

### ACCESS TO PATIENT AREAS

5/13/2021

Vendors are restricted from all patient care areas without the approval of the appropriate leader at the MO and department. Patient care areas include any area where direct patient care occurs, such as patient rooms, procedure rooms, nursing units, outpatient clinics, and the emergency departments. Vendor access to an operating room (OR) requires documented approval from OR management. Vendors are restricted to the surgical suite where the procedure is being performed and must exit upon procedure completion and leave the facility. Vendors must go directly to and from their appointment and may not loitering/solicit in hallways, lounges, cafeterias, and other areas of the hospital.

#### **PATIENT PRIVACY**

Vendors are prohibited from requesting or attempting to gain access to confidential information concerning patients or product/technology use without a Business Associate Agreement (BAA). The need to safeguard Northern Light Health patients' rights to privacy and confidentiality as defined by the Health Insurance Portability and Accountability Act (HIPAA), and to preserve the integrity of the environment of care for caregivers and medical staff, requires Northern Light Health to construct and enforce reasonable guidelines for appropriate vendor access and behavior.

#### **VENDOR REVIEW PROCESS**

Appropriate Northern Light Health Supply Chain team members will meet with vendors to review product/service/ technology offers and existing contracts. They may then exercise any of the following options:

- Send information to an existing value analysis subcommittee.
- Reject the offer based on current contract obligations.
- Approve a meeting with appropriate hospital staff member(s) or physician(s) as necessary.

#### **PURCHASE ORDERS/AUTHORIZATION TO BUY**

All products, equipment, and services require a purchase order number to be issued by the NLH Supply Chain Corporate Department and prior to the order and use of a product, equipment, or service. Hospital team members cannot verbally order any product or service from a vendor without following the Procurement of Goods and Services Policy. Night and weekend emergency orders will be handled through Supply and Distribution departments and the Administrator on Duty. Northern Light Health is not responsible for any product without a "purchase order" and a duly authorized "receipt", according to the NLH Procurement Policy which is located on <https://www.northernlighthealth.org/Legal/Vendor-Information>

#### **INVOICES**

All invoices must be sent to the address specified on the Purchase Order.

**PLEASE NOTE:** Any unapproved additional invoice line items that are not in the body of the purchase order will not be paid.

#### **DELIVERIES**

Deliveries of supplies and equipment must be sent to the address specified on the Purchase Order. No shipments will be received without a valid purchase order number. The purchase order number must be noted on the packing slip and label. Shipment without identifying purchase order numbers will be returned at the vendor's expense.

#### **CONTRACT NEGOTIATION**

Contract negotiations for supplies, equipment, and services will be conducted by appropriate Northern Light Health Supply Chain Contract Managers. Contracts are considered null and void unless signed by an authorized agent of Northern Light Health. Department team members, managers, and directors are not authorized to sign contracts on behalf of Northern Light Health.



**Business Review:** Vendors will conduct business reviews with the appropriate Supply Chain team member. Business reviews will include but not be limited to utilization, volumes, GPO tier level access, industry best practice, potential savings opportunities and a review of other pertinent information such as product quality, back orders, substitutions, vendor representative performance etc.

#### **NON-COMPLIANCE**

Hospital team members will neither meet with, nor allow within their areas, sales or service representatives lacking a valid pass. Violations will be reported to Supply Chain Management and/or Security after normal business hours. Failure to comply with the vendor registration and identification process or any other established policy of Northern Light Health will result in disciplinary action. Depending on the severity of the violation, the Associate Vice President of Supply Chain Management reserves the right to enact one or more of the following measures:

**First offense:** Written notification of offense sent to vendor representative and his/her manager.

**Second offense:** Written notification of suspension not to exceed six- month suspension from all Northern Light Health facilities.

**Third offense:** Permanent ban of vendor representative and possible discontinuation of any products/ services used from that company.

#### **PROMOTIONAL PRACTICES**

Vendors and NLH employees will comply with the NLH Conflict of Interest Policy 10-003 which is located at <https://www.northernlighthealth.org/Legal/Vendor-Information>. This policy outlines provisions for gifts, entertainment/meals, travel, training and education. The vendor will be required to sign an attestation form on Vendormate acknowledging they have read, understand and will comply with this policy. Vendors are not permitted to distribute, advertise, issue news releases, or broadcast any other general public announcement regarding its products, equipment or services to Northern Light Health facilities unless prior written authorization from appropriate Northern Light Administrator.

#### **SAMPLES**

Pharmaceutical Samples are prohibited.

Non-Pharmaceutical samples must be approved by the Northern Light Health Value Analysis Team for use within the Member Organization.

#### **SUPPLIER DIVERSITY**

We expect all of our suppliers to provide top-quality products along with the highest level of service. All vendors will demonstrate that they are proactive, innovative, and able to think strategically. Northern Light Health supports programs that foster diversity in our organization and in our communities. Where applicable, Northern Light Health expects its vendors to mirror our commitment through sub-contract opportunities with diverse and small businesses.

***Failure to comply with guidance of Northern Light Health Vendor Rules of Access and Conduct can result in immediate and permanent expulsion from Northern Light Health.***