

**AUDIENCE LEVEL**

- Organization-wide
 Ambulatory
 Departmental

VENDOR GUIDELINES**Purpose:**

To ensure that all vendors doing business with, or providing services for, Boulder Community Health (BCH) are identified and properly informed about BCH vendor requirements and guidelines to promote the security of all patients, visitors and staff.

To ensure registration and proper supervision for any vendor that has access to BCH facilities.

Scope:

This policy applies to all areas of BCH and all vendors, sales representatives, or contractors conducting business at any BCH location.

Policy Statements:

- BCH will ensure that all vendors with whom BCH conducts business are correctly identified and educated about BCH policies and vendor requirements.
- BCH staff is expected to uphold the highest ethical standards in interactions with all vendors.
- BCH shall not enter into any agreement for the purchase of medical devices, supplies, pharmaceuticals or any other item or service if it determines that the transaction is intended to influence the referral pattern of a physician who utilizes the item purchased by BCH.
- Vendors are required to schedule appointments via the ComCenter (303-415-7411) or visits with individuals of the specific department at BCH prior to being allowed to visit.
- Vendors will only be allowed on BCH premises if they have obtained prior approval and have satisfied any applicable policy, education, or vaccine requirements.
- Each BCH department is responsible for notifying vendors of the check-in process.
- All BCH staff are required to report any violation of this policy to the ComCenter and the Purchasing department.

Procedural Guideline Statements:

1. Vendor Check-in Process and Identification.
 - a. Vendors are required to check in at the Green Security kiosk, or designated area, and have a Green Security hard badge or print a temporary paper identification badge prior to visiting any department.
 - i. If a paper badge is printed, the ComCenter will issue a Contractor badge and record the vendor's name, company name, work date(s), and work to be



- performed by the approved contractor or vendor.
- ii. If the vendor is registered through Green Security, they must login to Green Security at the beginning of every visit, all training documents and policies will be reviewed using the Green Security system.
 - iii. Vendors that are not registered with Green Security will be offered copies of appropriate training documents and policies by the ComCenter. Policies for review include:
 1. Vendor Guidelines
 2. Compliance Policies
 3. Construction and Maintenance: Infection Control
 4. Surgical Attire
 5. Safety Management Policies
 6. Code of Conduct
 7. HIPAA Privacy Policies
- b. Vendors are responsible for complying with all BCH compliance policies.
- i. Policies are available upon request or can be accessed directly on the BCH website and searching for “Compliance Policies” (www.bch.org).
- c. All product Sales Representatives must register through BCH’s registration software, Green Security..
- i. Company and individual representative information and acknowledgements must be entered prior to obtaining a vendor identification badge.
 - ii. Vendor registration must be updated at least annually via Green Security.
- d. Vendors must display appropriate identification at all times while on BCH premises.
- e. Upon completion of on-site work, the vendor will return the identification badge to the ComCenter and sign out.
- i. If the vendor logged in using Green Security, they must also check out using Green Security.
2. New Products or Equipment
- a. The Purchasing department will coordinate all contact with vendors for any new product or equipment purchase.
 - b. Any new product or equipment must be approved through the Clinical Quality Value Analysis Steering Committee.
 - i. See LD.1003.ORG [Clinical Quality Value Analysis](#)
 - c. Any new product brought in for Surgical Procedures must receive approval.



- i. BCH will not issue Purchase Orders nor pay for products that have not followed proper process.
 - ii. Surgery Vendors must email bchcqva@bch.org with information on the product they'd like to introduce.
 - d. Any product in-service, demonstration, or trial will be coordinated by the Director of Supply Chain in conjunction with the director of the requesting department.
 - e. Criteria for evaluation and length of the trial period will be determined in advance.
3. Purchase Orders
 - a. Any product shipped to BCH for any reason must have a valid purchase order or payment for product will be denied.
 - b. Purchase orders will not be issued for new products (including replacement and upgrades) until presented to and approved by the Clinical Quality Value Analysis Steering Committee.
4. Contracting with Vendors/Intermediaries with Financial Relationships with Physicians or Their Immediate Family Members
 - a. BCH prohibits purchasing items or services for use in patient care, including but not limited to pharmaceuticals, implants, instruments, and other medical devices, from any supply chain that involves a physician-owned vendor or intermediary with which any affiliated physician or their immediate family member has a financial relationship.
 - b. All vendors and intermediaries of medical devices and supplies shall be contractually required to disclose to BCH all financial relationships (whether direct or indirect) involving physicians or their immediate family members who are either employed by BCH or who serve on the medical staff of BCH.
 - c. Such disclosures shall include non-monetary benefits if the annual value exceeds \$350 annually. In addition, contracts with vendors or intermediaries shall contain an ongoing obligation to disclose such future financial relationships and shall contain provisions for the prompt termination of the business relationship in the event of a failure to disclose or the disclosure of a prohibited financial relationship.
 - d. "Immediate family member" shall be defined as a spouse, natural or adopted child, sibling, sibling's spouse, parent, or an entity or trust of which any of the preceding persons is the trustee or beneficiary.
 - e. The contracting vendor or intermediary must complete the BCH Vendor Certification Form provided by Accounts Payable prior to the completion of any business transaction with BCH.
 - f. Exceptions to this policy for physician owned vendors or intermediaries may be approved only by the BCH Compliance Officer or the BCH General Counsel provided that the items or services are not utilized by the physician who has, or whose family member has the financial relationship with the vendor or intermediary. An exception



may be found where relationships with physician-owned vendors or intermediaries are necessary, and the contractual relationship is consistent with fair market value, and all other applicable legal standards are satisfied.

- g. Contact Legal Services for questions regarding this policy or the Vendor Certification Form.

5. Violations of this Policy

- a. Any violation of this policy will be reported to the Director of Supply Chain and the Environment of Care (EOC) Committee.
- b. Violations will be investigated to determine the nature, extent and potential risk.
- c. Green Security will be used to monitor vendor and individual Sales Representative compliance to determine eligibility for entry:
 - i. Sales Representatives must be compliant for all vaccine requirements.
 - ii. Failure to resolve Green Security non-compliance vaccine notifications within 48 hours will result in access suspension until resolved.
 - iii. Sales Representatives must be compliant for all credential requirements listed in Green Security.
 - iv. Failure to resolve any non-vaccine, non-compliance notifications within 14 days will result in access suspension until resolved.
- d. Vendor Representatives not following proper new product processes will be suspended for 30 days after the first offense, and permanently suspended after the second offense.
- e. Violations of this policy may include termination of the vendor's contract or prohibition of the vendor from further interactions at BCH.

6. Exceptions and Exemptions

- a. Vendors required for an emergency situation at BCH are exempt from the provisions of this policy until such time as they are able to safely remove themselves from their duties.
- b. Delivery employees such as UPS, Federal Express, Airborne Express, US Postal Service employees, and all other delivery employees, shall be exempt from the provisions of this policy due to the short-term nature of their work and their limited access to BCH areas.
- c. Any other exceptions to the above policy must be approved by the Vice President over the requesting department or the President/CEO.

7. Compliance monitoring

- a. Green Security and the Comm Center logs will be used to monitor policy compliance.
- b. Administration of the Green Security system will be performed by Supply Chain staff, this includes:



- i. Updating required credentials
 - ii. Running reports
 - iii. Configuring system notifications
 - iv. Performing audits
- c. Credential requirements in Green Security for individual Sales Representatives will be emailed to department contacts in procedural areas.
 - i. Departments should follow up with Sales Representatives to remind them of an upcoming requirement that needs met and that failure to complete this will result in access termination.
- d. The following reports will be provided to the EOC:
 - i. Monthly, the Green Security log and Comm Center log will be reconciled to identify any inappropriate entry and reported.
 - ii. Results of ten (10) random audits per month will be completed and reported.

Definitions:

1. **Vendor:** A person or representative of a company (including independent contractors) that has a contract or Business Associate Agreement with BCH or is seeking to provide support, services and/or maintenance at BCH.
2. **Sales Representative:** Any healthcare product, medical device, or medical equipment company employee whose job duties include sales and marketing or clinical support of their product through interactions with physicians and staff.

Resources:

None

References:

None

Other Related Policies:

- [LD.1003.ORG Clinical Quality Value Analysis](#)
- [LD.3007.ORG Compliance: Gifts, Sponsorships, and Business Courtesies](#)
- [SUR.6003.DEPT Surgical Attire](#)

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