

	COMPLIANCE DEPARTMENT POLICY AND PROCEDURE DIRECTIVE
SUBJECT Vendor/Outside Provider Interaction Policy	NUMBER 2015-2-01 <div style="text-align: right; margin-right: 50px;">1</div> <div style="text-align: right; margin-right: 50px;">2</div>
PREPARED BY Donna Rooney Vice President of Corporate Compliance	EFFECTIVE OR REVISED DATE 3-23-2015 (Note: Individual pages may be revised and revised date shown on them)
DISTRIBUTION All facilities and corporate offices	APPROVED:

Purpose:

To ensure proper decorum and legally compliant behavior of vendor sales representatives or outside providers doing business with Mid-Atlantic Health Care, LLC (“MAHC”) and its managed skilled and rehabilitation facilities and to ensure compliance with all applicable laws.

Policy:

It is essential that all persons and organizations that do business or may want to do business with Mid-Atlantic Health Care and its managed skilled and rehabilitation facilities, including pharmaceutical, durable medical equipment, medical device, and diagnostic equipment

manufacturers, (“Vendors”) remain aware that the primary objective of Mid-Atlantic Health Care and its managed skilled and rehabilitation facilities is resident care. (See Ambulance Services Exception, p.4).

Providers and Vendor sales representatives will be permitted in Mid-Atlantic Health Care’s (herein “MAHC”) skilled and rehabilitation facilities as long as they follow the MAHC policies below and do not cause or create interference with resident care.

Providers and Vendor sales representatives are expected to conduct themselves in a professional manner at all times. In addition to MAHC and its managed facilities’ general policies, Providers and Vendor sales representatives are required to comply with the Vendor-specific policies set forth below.

Procedures Applicable for Vendor Sales Representative:

I. On-site Visits to MAHC and any of its Managed Facilities

A. Registration

a. At the time of their initial visit to an MAHC skilled nursing and rehabilitation facility, all Vendor sales representatives must first register with the receptionist/front desk.

B. Sign-in

Each time a Vendor sales representative visits Mid-Atlantic Health Care and any of its managed skilled and rehabilitation facilities he/she must proceed directly to the front desk, sign in and procure a temporary visit badge with the date of that visit. The visitor badge must be visible at all times while the Vendor sales representative is on the premises.

C. Acknowledgment :

Each Vendor sales representative must be presented with a copy of this policy and must sign the form below indicating that he/she has read and understood the policies governing the conduct of Vendor sales representatives.

D. Authorized Visits

Unless otherwise agreed upon by the Administrator, visits by Vendor sales representatives to Mid-Atlantic Health Care and its managed skilled and rehabilitation facilities personnel should be made on an appointment only basis. Sales representatives should call the person (or administrative assistant) they wish to visit and arrange an appointment time (unless arrangements have been made by Administrator that due to the nature of Vendor’s business, appointments are unnecessary).

E. Access to Patient Care Areas

Providers and Vendor sales representatives are prohibited from entering unauthorized resident care areas. Exception: Vendor sales representatives may access patient care areas when (1) access is required for measuring or customizing on new equipment or supplies ordered by a physician.

- a. Vendor sales representatives may not enter patient care areas unless there is disclosure to, and consent by, the patient or the Administrator.
- b. Vendor sales representatives may not approach nursing staff to retrieve resident PHI for vendor billing purposes.
- c. Vendors are not to walk through the nursing facility, access resident areas, resident records or nursing station areas.

F. Request For Documents:

All Vendors who require documentation for billing purposes should send in a request 24 hours before arrival to facility. The Medical Records /or Central Supply Clerk will prepare necessary documents for pick up.

II. Personal Gifts and Meals

- A. Providers and Vendor sales representatives are prohibited from providing personal gifts (as defined below) to MAHC and any of its managed facilities employees (as defined in the MAHC Compliance Plan). General lunches or snacks for staff are acceptable.

III. Evaluation and Demonstration Products by Vendors

A. Vendors sales representatives may provide **reasonable quantities** of evaluation and demonstration products to MAHC to allow the employees to assess the appropriate use and functionality of the products and determine whether or not to use or recommend the products in the future, subject to the restrictions below.

B. Evaluation and Demonstration Products include single use products and multiple use products. Vendors and Vendor sales representatives may provide single use products to MAHC employees only if the representatives provide a quantity no greater than reasonably necessary for adequate evaluation.

IV. Vendor Training and Education Programs

A. Vendors may provide training and education on their products and medical technologies to Mid-Atlantic Health Care and its managed skilled and rehabilitation facilities provided that (1) the programs are conducted in settings that are conducive to the effective transmission of information, (2) programs providing “hands on” training are held at appropriate facilities, and (3) training staff have the proper qualifications and expertise.

B. Vendors may **not** provide Personal Gifts to MAHC employees or MAHC residents attending training and education programs to induce business for the vendor.

C. Vendors may not utilize an educational training session to market their products to employees and residents/families to induce business for the vendor.

D. Vendors may provide product and company information at a designated place for families to seek out information for resident care purposes.

Notice: Vendors who violate this policy may result in notification of suspension or termination of services.

Ambulance Services Exception: Due to the emergent nature of services provided by ambulance services, this policy does not apply.

Contact: Vice President of Corporate Compliance, (410) 308-2300, Extension 227.

Vendor Agreement

As a Vendor doing business with Mid-Atlantic Health Care and /or one or more of its managed facilities I agree to the follow:

1. I will not access patient/resident information unless required by my vendor purpose to do so.
2. I will limit my movements while in the Mid-Atlantic Health Care facilities to only those areas required by my vendor purpose.
3. I will comply with HIPAA regulations and not access patient/resident information unless required to do so.
4. I agree that all medical records information that is required to be copied for vendor billing purposes will be presented to the medical records person 24-72 hours before arrival.
5. I will not present new product information to staff at the facilities. I agree that new product information must be presented to the Sr. Vice President /or Chief Clinical Officer. Please call (410) 308-2300.
6. I will not market my business to other residents/families or staff.

Name : Print _____ Date: _____

Name: Signature _____

