



**HUNTERDON
HEALTHCARE
SYSTEM**

Standards of Business Conduct For Vendors

An Introduction to the Hunterdon Healthcare Vendor Management Program

Hunterdon Healthcare System
2100 Wescott Drive
Flemington, NJ 08822

Revised May 2015



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Dear Business Partner,

Hunterdon Healthcare System exists for one single purpose: To improve the quality of life for the community we serve. As we have grown from a community hospital to a nationally-recognized health care provider, so has the complexity of standards set forth by the government, accrediting bodies and professional medical associations. During the past few years, the role of vendors in the provision of health care has generated a great deal of interest among those who establish standards for health care and those who provide direct patient care. Though from different perspectives, these groups are unified by their advocacy for greater transparency in the relationship existing between a health care provider and its vendors. The underlying need for improved transparency is abundantly clear: to protect the safety and privacy of the patient.

In consideration, Hunterdon Healthcare System is implementing the Hunterdon Healthcare Vendor Program ("Vendor Program") to foster an environment of transparency in our vendor relationships. We are committed to conduct business legally and ethically, and we want to collaborate with vendors who share this commitment with us. The purpose of this guide is to communicate our policies related to our purchasing process, patient safety, the provision of health services with limited distractions, and the highest standards of business conduct.

If you have any questions regarding the information contained within this document, please contact the Director of Materials Management as listed below. We thank you for your support.

Materials Management
Telephone: (908) 788- 6123
Fax: (908) 788-6450
Hours: Monday – Friday 7 AM – 5 PM

Hunterdon Healthcare System Mission

The people of the Hunterdon Healthcare System will be leaders in the provision of quality health care that is compassionate and effective. This shall be achieved through teamwork, personal initiative and continuous innovation. We shall build lifetime relationships based on anticipating the needs and exceeding the expectations of those we serve.

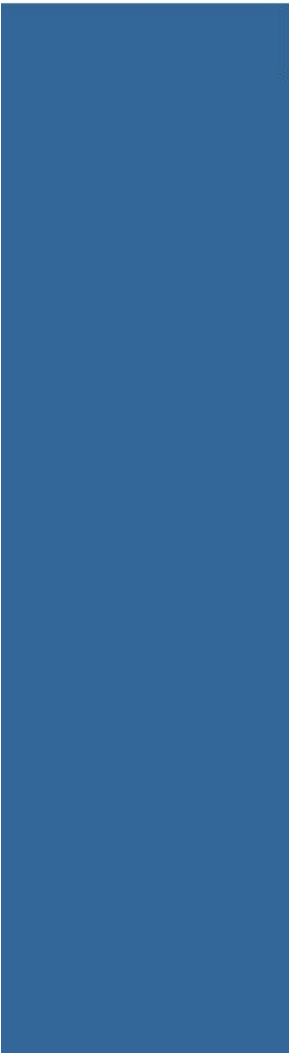
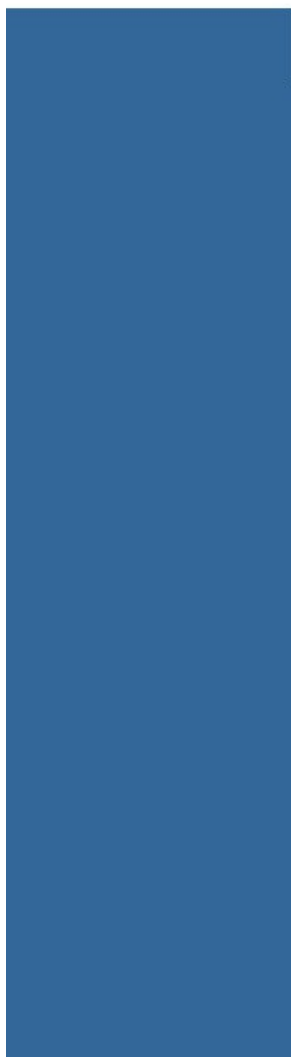


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About Hunterdon Healthcare System

Hunterdon Healthcare System is a non-profit health care organization in Flemington, New Jersey committed to providing a full range of quality services that respond to the needs of the community through the following member organizations:

- **Hunterdon Medical Center**

The 178-bed Medical Center provides comprehensive medical, diagnostic, surgical, behavioral health, rehabilitative and preventive health services to inpatients and outpatients. Hunterdon Medical Center's array of services include the Hunterdon Regional Cancer Care Center, Hunterdon Regional Breast Care Program, diagnostic imaging services, the Maternity and Newborn Care Center, and cardiac care services – among other services. The Hunterdon Health and Wellness Center is a hospital-based facility in Whitehouse Station that combines fitness with disease prevention and health enhancement.
- **Hunterdon Medical Center Foundation**

This is the charitable organization which supports the Hunterdon Healthcare System through fundraising activities and educational programs and seminars.
- **Hunterdon Regional Community Health**

This entity was formed in 1996 to develop community programs and expand home care services. Its member organizations include Hunterdon Hospice, Visiting Health and Supportive Services, Hunterdon Community Care, and Hunterdon Infusion Services.
- **Mid-Jersey Health Corporation**

Mid-Jersey Health Corporation focuses on alliances and partnerships to develop health services. Partnerships include:

 - Hunterdon Cardiovascular Health (Cardiac Care at Hunterdon Medical Center)
 - Hunterdon Doctors Office Building (adjacent to Hunterdon Medical Center and contains independently-owned physician offices)
 - Hunterdon Imaging Association (MRI Services)
 - Center for Surgery
 - King's Court Imaging Center
- **Hunterdon Healthcare Partners, LLC**

Hunterdon Healthcare System partnered with Hunterdon Physician Practice Association to form Hunterdon Healthcare Partners LLC, an integrated delivery network consisting of 125 physicians dedicated to enhancing medical care in the community.

The Hunterdon Healthcare Vendor Program

Purpose: To comply with regulations regarding patient safety and privacy while enhancing information transparency for Hunterdon Healthcare System's vendor partnerships.

Effective **March 1, 2008**:

- All vendors and their representatives currently serving Hunterdon must complete an online registration process, managed by Vendormate, Inc. in order to continue their business relationship with Hunterdon. Vendors must register separately from their representatives.
- An annual, per company fee, ranging from \$25 to \$250, must be submitted with the vendor's first registration. This flat fee, based on the scope of a vendor's business relationship with Hunterdon, is paid to Vendormate to cover expenses such as continuous background checks, communication, and database maintenance.
- All vendors **must** have scheduled appointments. **Cold calls will no longer be accepted.** Vendor representatives arriving at Hunterdon without an appointment will be turned away.
- Vendors with scheduled appointments will be required to check in upon arrival and obtain a badge. Vendors must complete a check-out process upon the completion of their visit.

Vendors may obtain additional information about Hunterdon's Vendor Program by accessing an "Information for Vendors" section contained on Hunterdon's website:

- Click www.hunterdonhealthcare.org/vendors.asp

Overview of the Registration Process

To access the registration website directly, visit the following website:

<https://hunterdonhealthcare.vendormate.com>

The registration process consists of two phases:

- Registration of the vendor as a company
- Registration of each sales representative and/or other staff members who visit Hunterdon for business purposes

The company and each representative will be required to provide contact information and upload documentation as specifically required to become a registered "vendor company" or registered "vendor rep".

Note: The registration process requires entry of the vendor company's federal tax identification number. This number must be available to avoid delays in completing the registration process.

The company/vendor registration process entails the following steps:

1. Business Identification:
 - Legal business
 - Type of business
 - Federal Tax Identification Number (FEIN)

2. Basic Business Information:
 - Business address and telephone
 - Catalog of products sold (identified using UNSPSC codes)
 - Estimated amount of business done with Hunterdon during past 12 months
 - Representative's Information

3. Acknowledgment of Hunterdon's policies

4. Payment:

Payment of annual "per company" registration fee to Vendormate, using a credit card. Note: This fee is paid **only** during the first registration a vendor completes. Each vendor rep registering thereafter will not be required to pay a fee.

Registration Fee Structure

Vendor Groups ¹	Annual Fee ²
Level I Vendors	\$250
Level II Vendors	\$100
Level III Vendors	\$25

5. Confirmation:

You will receive an email and click link to confirm your email address and login information.

¹ A vendor is placed in a vendor group as predetermined by Hunterdon Healthcare System – on the basis of the scope of the business relationship, access to patient areas, and other qualifying criteria. A vendor does not select a level for registration purposes.

²The annual fee represents a "flat, per company fee" to be paid annually when the first registration is completed for either the vendor's company profile or for one of its representatives. There is no fee assessed for multiple representatives associated with the same vendor.

For More Information

About the Vendor Program: vendors@hunterdonhealthcare.org

For Online Registration Technical Support:

hunterdonhealthcare@vendormate.com or call (877) 754-1636

Registration/Certification Requirements for Vendor Representatives

Based on the scope of products and services marketed to Hunterdon, a vendor representative will be classified into one of the three aforementioned categories, based on the representative's product offerings, access to patient areas, and other qualifying criteria. There are certification requirements specific to each category; these requirements are consistent with standards set forth by the following:

- Health Insurance Portability & Accountability Act of 1996 (HIPAA)
- Association of peri-Operative Registered Nurses' (AORN) Standards for Health Care Industry Representatives in Operating Rooms
- The Joint Commission
- Hunterdon Healthcare System Policies and Procedures

Regardless of classification, all vendor representatives must acknowledge and abide by the following principles to conduct business with Hunterdon Healthcare System:

1. **Conflict of Interest**. Vendors must provide a full disclosure about any conflicts of interest that exist.
2. **Corporate Compliance Program, Deficit Reduction Act (DRA) of 2005, and False Claims Act**. Vendor acknowledges and abides by Hunterdon's Compliance Program and agrees to disseminate to its employees information about Hunterdon's Compliance Program and DRA Provisions – and require its employees to abide by the same.
3. **Tobacco-Free Policy**. Vendor agrees not to use tobacco products while on Hunterdon's premises.
4. **HIPAA and Patient Confidentiality**. The discussion, release, or use of any patient-related information viewed or overheard may not be used for any purpose other than that which is related to job assignments and in compliance with patient privacy laws.
5. **Confidentiality of Business and Other Proprietary Information**. Any type of information generated in connection with Hunterdon Health's operations must not be accessed, downloaded, discussed, used, or disclosed for any purpose other than to conduct business with, or on behalf of, Hunterdon Healthcare System. Agreement to not improperly disclose confidential information continues after termination of the vendor business partnership.
6. **Scheduling of Appointments**. Vendor must schedule appointments in advance of visits, display a Hunterdon-issued badge while on Hunterdon's premises (if required), and complete the required check-in and check-out process.

7. **Accompanying Guests.** Vendor Rep agrees to accompany, at all times while visiting Hunterdon's facilities, any guests accompanying the Vendor Rep who are not registered with the Hunterdon Healthcare Vendor Program.
8. **Conduct & Interactions with Hunterdon's Employees & Medical Staff.** When in Hunterdon's facilities and interacting with Hunterdon employees and Medical Staff, Vendor understands and agrees that:
- Conversations with staff in patient care areas should be minimal, must be professional and case related only. No socializing.
 - All patient education materials must be evaluated by the Patient Education Department prior to their use.
 - Procedure rooms are to be entered only at the request of, and as directed by, the physician(s). The Vendor Rep cannot change or touch any equipment, carts, or sterile equipment. The Vendor Rep must follow the instructions of the Circulating Nurse at all times.
 - Standards governing introduction of new products and the removal of expired or recalled products are abided by as a condition of doing business with Hunterdon.
 - Policy for providing gifts, meals, and education to Hunterdon's employees and Medical Staff must be followed.
 - Items and services provided to and accepted from Hunterdon will not exceed those that are reasonable and necessary for ethical business purposes and that the amount paid to, or payable by, Hunterdon will be at a fair market value amount.

Compliance with the above standards, as well as those set forth in this Standards of Business Conduct Guide, shall extend to the Vendor Representative's Company, Co-workers, agents, and subcontractors.

Conducting Business With Hunterdon Healthcare System

General Facility Access Standards

Vendor Reps may enter Hunterdon Healthcare System facilities for the purpose of conducting business only when the following conditions are met:

- **Vendor Reps New to Hunterdon Healthcare System**

A new Vendor Rep is required to make an initial appointment with the Materials Management Department to become acquainted with the Purchasing Staff and to address any questions that the new Vendor Rep may have. Appointments will be coordinated with the Senior Buyer, Buyer or Contract Coordinator per their designated expertise. The Vendor Rep and its company must complete the registration process and the initial meeting with Materials Management prior to meeting with any other HHS personnel.

- **Tobacco-Free Facilities**

Effective January 1, 2007, Hunterdon's facilities are **tobacco-free** facilities. No tobacco product use of any kind will be permitted inside or outside of any Hunterdon Healthcare System property.

- **Scheduled Appointments**

The Vendor Rep must have a scheduled appointment – a meeting or clinical case, for example – and must limit his/her business-related activities at HHS to the scheduled appointment(s). Under **no circumstances** will cold calls (visits without previously-scheduled appointments) be allowed after March 1, 2008. Drop-in visits to other departments are **not** permitted.

Scheduling of department appointments must be arranged by the department and the Vendor Rep. Materials Management is not responsible for scheduling vendor appointments for other departments.

- **Badge and Check-In Process at Facilities Other Than Hunterdon Medical Center**

The Vendor Rep must check in, obtain a badge, and sign out at the conclusion of the scheduled appointment(s). This process is to be completed with assistance from Front Desk staff at the location where the appointment is occurring. With the exception of the introduction meeting that a new Vendor Rep must complete, it is **not** necessary for a Vendor Rep to report to Materials Management prior to attending a scheduled appointment at another HHS facility.

Fire Safety

In the event you hear the fire alarm while conducting an appointment at Hunterdon, you should listen for an overhead paging announcement of "Code Red", Hunterdon's "code" for fire – along with an announcement about the location of the alarm. If the alarm is not near your location, you may continue what you were doing. However, **do not use the elevators**, use the stairs instead.

For your safety, and that of others, remember the word "**RACE**" as a reminder about the appropriate action to take – at Hunterdon, your home, or elsewhere. RACE is an acronym for Rescue, Alarm, Confine, and Extinguish/Evacuate.

Rescue:	Rescue individuals who are in immediate danger
Alarm:	Pull the nearest fire alarm box by grabbing the center handle and pulling down until it stops. Release the handle and notify the closest Hunterdon employee.
Confine:	Confine the heat and smoke by closing all doors and windows in the area of the fire, plus adjacent areas.
Extinguish/Evacuate:	Use a fire extinguisher to put out the fire, if you feel comfortable doing so and if use of an extinguisher would be effective in eliminating or greatly reducing the fire. Otherwise, evacuate the area immediately, closing the door behind you.

To use a fire extinguisher, remember the word "PASS" to correctly use the device:

P	Pull the pin
A	Aim the nozzle at the base of the fire
S	Squeeze the handles to release the extinguishing agent
S	Move the extinguisher in a back and forth sweeping motion, as though you were operating a broom, to extinguish the fire.

Infection Control: Important Facts

To reduce the risk of transmitting pathogens, there are a few precautionary practices to employ:

- **Wellness:**
Stay home if you are sick with something infectious. If you are not feeling well, for your own health and for consideration of others, we prefer that you cancel your appointment and reschedule when you are feeling better.
- **Bloodborne Pathogens:**
Bloodborne pathogens are microorganisms present in human blood and other potentially infectious materials. Examples of common illnesses spread by blood borne pathogens include Human Immunodeficiency Virus (HIV), Hepatitis B

(HBV), Hepatitis C (HCV), and Malaria. Any body fluid with visible blood may be infectious.

These microorganisms can cause disease or death when transmitted from an infected person to another person. The transmission may occur when blood or body fluid from an infected person enters another person's body. For healthcare workers, this transmission may occur:

- through accidental puncture from contaminated needles, other sharps, or broken glass
- contact between mucous membranes and infected body fluids

- **Standard Precautions:**

In 1996, the Centers for Disease Control issued "Standard Precautions" as recommendations for the protection against the transmission of blood borne diseases and other diseases when treating all patients. To protect yourself and others, always treat all blood, body fluids, secretions and excretions, non-intact skin and mucous membranes as if they are infected with bloodborne or other pathogens.

- **Handwashing**

Handwashing is one of the most important precautions for preventing the transmission of infections. A standard handwashing technique consists of: soap, a vigorous rubbing together of all surfaces of lathered hands for 10 – 15 seconds, thorough rinsing under a stream of water, thorough drying hands with a clean, disposable paper towel, turning off faucets with the paper towel, and disposing of the paper towel in a garbage receptacle.

Handwashing must occur:

- Before and after treatment with each patient
- Before donning gloves and after gloves are removed
- Immediately when accidental bare-handed contact with blood, body fluids, secretions and excretions, non-intact skin, mucous membranes, or infected equipment occurs.

- **When Blood Spills Occur:**

To clean up blood spills, wear gloves, blot the blood with absorbent materials, use a disinfectant to clean the area of the spill, and discard the blood-soaked materials in a biohazard bag.

- **Contaminated Sharps and Linens:**

Sharps: When handling sharps, always wear gloves. Do not recap the needles. Dispose of the used sharp in a needlebox immediately after use.

Linens: When handling contaminated linens, always wear gloves, and handle

the linens as little as possible. Place the soiled linens in a leak-proof bag if soaking is likely.

HIPAA and Patient Confidentiality

Hunterdon respects the privacy of its patients and requires that all who conduct business with Hunterdon share this commitment. HIPAA, the Health Insurance Portability and Accountability Act of 1996, enhanced the protection of a patient's privacy. HIPAA prohibits a Vendor Rep from reviewing the medical records of patients for the purpose of determining which patients may benefit from the Vendor Rep's products or services.

All information regarding patients of Hospital and Affiliates and their treatment, will be held in strict confidence. This information will not be discussed with third parties or in public places. HIPAA privacy standards require Hospital to regulate business associates.

Therefore, any person or company performing an activity or service for Hunterdon that involves the use or disclosure of individually identifiable health information must agree to enter into a business associate contract to ensure that each business associate protects protected health information (PHI). The business associate contract must contain provisions that establish the permitted and required uses and disclosures for PHI. Furthermore, the business associate contract must provide that the business associate may not use or further disclose the information other than as permitted by the contract or as required by law.

All contracts proposed by vendors should include appropriate HIPAA compliance provisions. In any event, the vendor must agree that any and all actions taken or authorized by the vendor regarding the transaction, goods, or services involving or relating to Hunterdon shall comply with all applicable laws pertaining to standards for electronic transactions, including those set forth in the Health Insurance Portability and Accountability Act of 1996, and all rules promulgated there under. The vendor is also responsible for requiring all agents or subcontractors to comply with such applicable law. Upon the request of the Hunterdon, the vendor will provide appropriate documentation of its agents or subcontractors compliance with such requirements.

Confidentiality of Information

In the course of interacting with Hunterdon Healthcare System, you may receive information about Hunterdon's patients, employees, donors, and its financial or business operations. Some of this information may be considered "confidential" by law or by Hunterdon's policies. Confidential information may exist in any form –

e.g., written, oral, overheard, observed, or electronics. It is your responsibility to comply with Hunterdon's policies by accessing only such information that you need to perform your job and in accordance with the law. Individuals receiving confidential information are prohibited from disclosing such information to friends, relatives, co-workers, patients, and others unless permitted by Hunterdon's policies, applicable law, or as required to perform your assigned job duties. Confidential information must be protected while doing business with Hunterdon and after your business relationship with Hunterdon ends. Violation of Hunterdon's confidentiality policy may subject you to adverse action, up to and including termination of your business relationship with Hunterdon, as well as civil or criminal penalties as applicable by law.

Corporate Compliance Program

Hunterdon Healthcare System ("Hunterdon") is committed to providing quality health care services in an ethical and legal manner. The business partnerships that we have with your organization, and our other vendors, are an important aspect of our ability to fulfill our commitment of providing quality health care to the community we serve. Therefore, we must work together to ensure that we maintain a partnership that is compliant with the multitude of government regulations, accreditation standards, and industry codes of ethics – for hospitals, physicians, and manufacturers – that impact our business interactions and thereby minimize the probability for noncompliance to occur.

Our Corporate Compliance Program is based on the following seven key elements:

- **Policies and Procedures**

A series of policies and procedures, including a Code of Ethics, have been developed to address components of Hunterdon's Corporate Compliance Program. Our Code of Ethics states that all HHS personnel must conduct themselves according to the highest ethical standards in accordance with all applicable laws, rules and regulations. Vendors, contractors, and agents conducting business with us, or on our behalf, are expected to comply with our Code of Ethics as business is carried out.

- **Corporate Compliance Officer**

Ann Michaels serves as Corporate Compliance Officer for Hunterdon Healthcare System and provides oversight to the day-to-day operations of the compliance program. She can be reached at (908) 237-7098 or by email at michaels.ann@hunterdonhealthcare.org.

- **Education and Communication**

The Corporate Compliance Officer provides a discussion about our compliance program to new employees attending Orientation. Additionally, all employees are required to complete at a minimum, at least one compliance education

course. Our compliance education outreach now extends to our vendors and suppliers through our Vendor Management Program. Vendors are required to review our corporate compliance program and agree to abide by our policies in order to conduct business with us.

- **Communication (Incoming)**

Employees, vendors, contractors, and agents have an obligation to report suspected fraud, false claims, or other issues of potential non-compliance to us so that we may properly address the allegation. Anyone reporting an issue in good faith is protected from retaliation, as set forth in federal and state laws.

Hotline. Hunterdon has a confidential Hotline that is available 24 hours a day, 7 days a week to receive questions and concerns of potential compliance issues. An individual can choose to remain anonymous when using this voice-mail reporting system unless a response is expected. However, sufficient detail must be provided in order for the issue to be investigated. The Hotline can be reached at (908) 788-2585 and is available for use by Hunterdon's contractors and vendors, as well as by employees and medical staff members.

Other Options. Other options for reporting a suspected violation include: department supervisors, senior management, and the Corporate Compliance Officer.

- **Response to Compliance Issues**

The Office of Corporate Compliance ensures that potential issues are thoroughly and promptly investigated and that corrective actions are taken as necessary. Corrective action may include policy development, reporting to a government agency, or disciplinary action for an individual committing a violation.

- **Routine Auditing & Monitoring**

The Corporate Compliance Officer works with departments to identify and monitor compliance risks and correct issues that could potentially lead to non-compliance.

- **Disciplinary Action**

The Corporate Compliance Officer works with Human Resources to ensure that appropriate employee disciplinary action is carried out when non-compliance occurs.

Compliance Issues to Report

From a vendor's perspective, the types of general compliance issues that you should report to the Corporate Compliance Officer, or other person of authority, include, but are not limited to, the following categories:

- Misuse of Hunterdon's assets, including improper use of the internet and computer systems
- Billing or coding issues
- Conflict of interest issues
- Non-compliance with HHS policies or procedures
- Confidentiality and patient privacy violations (including review of medical records unrelated to job responsibilities)
- Safety and security issues
- Harassment by a Hunterdon employee or medical staff member
- A request for a gift or other item of value in exchange for referring or using your company's products – or a gift whose magnitude is prohibited by Hunterdon's policy
- Receipt of kickbacks, rebates, or special discounts from another vendor in exchange for purchasing and/or referring the other vendor's products

Deficit Reduction Act

The Deficit Reduction Act of 2005 ("DRA"), which became effective January 1, 2007, requires Hunterdon, as a healthcare provider, to maintain policies and procedures that address federal and state laws regarding fraud, waste and abuse in federal healthcare programs. The DRA also requires that we disseminate these policies and procedures to our employees, contractors, vendors, and agents.

As a vendor to Hunterdon, you are required to review, become familiar with, and abide by our False Claims Act (FCA) Policy. The FCA is a law by which the federal government prosecutes, criminally or civilly, individuals or entities that submit or cause to be submitted, claims for payment by the government, when the claims are known to be false. In the healthcare industry this includes submission of claims to Medicare, Medicaid and other federal healthcare programs. Pure and simple, this policy states that we will not knowingly submit a false claim to the government and that our business partners will not cause us to file a false claim to the government. This policy, and additional information about our corporate compliance program, is available by visiting the following link:

<http://www.hunterdonhealthcare.org/vendors>

We believe that much, if not all, of what is contained in our policy closely resembles information you have received through your own company's compliance program. However, if any of this information is new to you and you are the owner or a principal officer of your company, we ask that you share this information with your employees.

Conflicts of Interest

Hunterdon expects its employees, contractors, and vendors to conduct business in an honest and objective manner. Vendor Reps, and their vendor companies, have an obligation to avoid and disclose any relationships and/or ethical, financial, or legal interests involving Hunterdon and its associates that could potentially impair their ability to make objective decisions involving Hunterdon Healthcare System.

Examples of situations involving a vendor and a Hunterdon associate (defined as employee or medical staff member) that could impose potential conflicts of interest include, but are not limited to, the following:

- A personal relationship existing between the vendor and the Hunterdon associate who makes purchasing decisions about the vendor's products and services
- A Hunterdon associate who has a substantial financial interest in the vendor's company or serves as on a Board connected to the vendor's company
- A vendor who is also a part-time employee of Hunterdon – or vice versa
- Knowledge of confidential business information, gained about the business partner through the business relationship, that could be improperly used for personal gain.

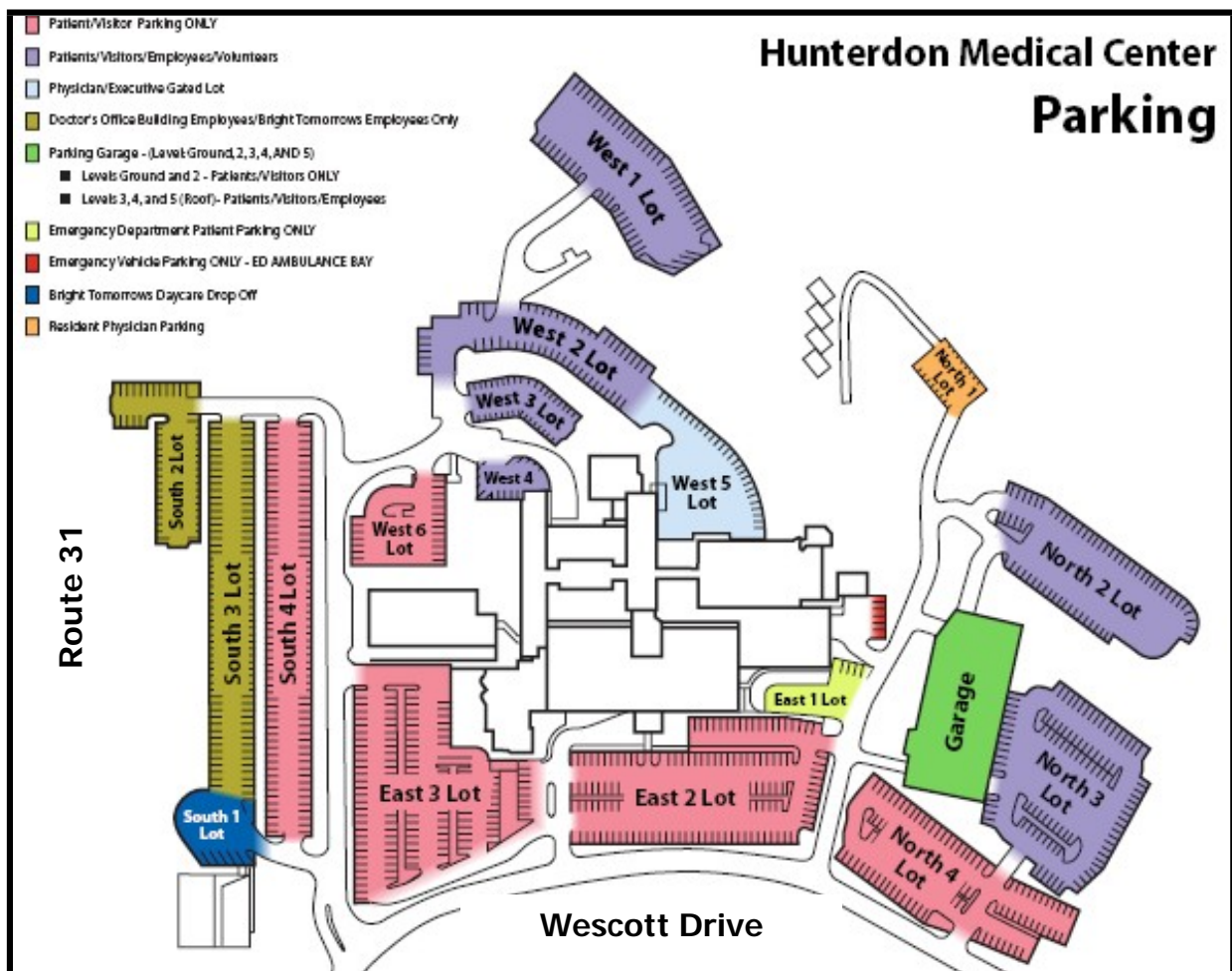
Conducting Business at Hunterdon Medical Center

Parking at Hunterdon Medical Center

Vendor Reps may park in the following location at Hunterdon Medical Center:

- Parking Garage
- North Lots 2, 3
- West Lots 1, 2, 3, 4

The parking lot directly in front of the Hospital's Main Entrance and the parking lots closest to the Cancer Center and Doctors Office Building are reserved for patients and their visitors.



Badge and Check-In Process at Hunterdon Medical Center

The Hospital's Main Entrance is open from 6:00 AM to 9:00 PM and serves as the primary entrance for vendor Reps and other visitors. For appointments at Hunterdon Medical Center (HMC) occurring between 6:00 AM and 9:00 PM, the

Vendor Rep must complete the check-in and badging process at the badging station located in the Materials Management (Purchasing) Department or at a badging station identified by the department the Vendor Rep is visiting.

Materials Management, located in the basement of Hunterdon Medical Center, can be accessed:

- By entering the second door on the left side, after passing the Information Desk in the Front Lobby. The stairs lead downward to the Basement; Materials Management is the second door on the left. OR
- By way of elevator, via the first open hallway on the left side after passing the Information Desk.
- By way of the patient elevators, located across from the Pharmacy, which is located on the first floor.

Check-Out Process at Hunterdon Medical Center

The check-out process must occur at Materials Management, at the department where the appointment occurred, or via the self-service kiosk. The badge must be returned during the check-out process.

Appointments After 9 PM and Before 6 AM

When appointments at the Hospital occur after the Main Entrance closes at 9 PM, the Vendor Rep must enter the Hospital through the Emergency Department Entrance, located on the second floor of the Hospital, and to the right of the Main Entrance.

Vendor Reps are not allowed to enter the Facility using an employee's badge; during off-hours, Vendor Reps are still required to complete the check in and check out process and obtain a badge.

The Manager of the department being visited by the Vendor Rep is responsible for ensuring that the Vendor Rep gains access to Hunterdon Medical Center when the Main Entrance is closed and for notifying the Vendor Rep of the process for gaining access. It may be necessary for the Vendor Rep to present some form of photo identification to the Security Officer in order to gain access. Therefore, it is recommended that the Vendor Rep has in his/her possession a photo ID issued by his/her employer – bearing the company's name and the vendor rep's name.

The department being visited is responsible for ensuring that the Vendor Rep's arrival time and departure times are correctly reflected in the online Vendor Registration Program.

- **Access to Patient Care Areas**

Vendor Reps are not allowed to enter patient care areas of the Hospital without specific permission from a director or manager of that department. While in patient care areas, the vendor should be accompanied by a Hunterdon Medical Center employee at all times and must follow any internal policies of the respective department.

- **Access to Common Areas of Hospital**

Excluding appointments, a Vendor Rep may spend up to one hour in the Hospital's cafeteria, snack bar, lobby, and corridors. However, the Vendor Rep is **prohibited** from approaching physicians or Hunterdon employees in these areas, as well as in elevators or patient care areas, for the purpose of conducting business discussions.

Use of Cell Phones & Hospital Equipment

A Vendor Rep is permitted to use wireless devices in posted designated areas only. Cellular phones and wireless cellular PC card use is permitted in most areas with the exception of the following prohibited areas, where phones **must be turned off**:

- ICU
- Operating Room (2nd Floor and Maternity)
- PACU (2nd Floor and Maternity)

Use of Hunterdon equipment, such as telephones and computers, is prohibited unless the Vendor Rep is visiting the Hospital for the purpose of conducting business or the Materials Management department grants permission to the Vendor Rep.

Materials Management (Purchasing) Policies

The Materials Management (Purchasing) Department for Hunterdon Healthcare System is located in the basement of Hunterdon Medical Center. This Department is open from 7:00 AM to 5:00 PM, Monday through Friday and can be reached at (908) 788-6123 to schedule appointments. After March 1, 2008, all visits to Materials Management must be scheduled in advance; cold calls are no longer accepted.

Use of Purchase Order

All purchasing-related transactions require a purchase order – including those for which there is not an exchange of funds – in order for the Accounts Payable department to submit payment.

Group Purchasing Membership

Volume purchases must be reported through our Group Purchasing Organization. Hunterdon is a member of VHA/Novation and Amerinet. Additional information is available by contacting the Purchasing Department.

Standard Payment Terms

Standard non-contracted payment terms are Net 75 and shipments are FOB destination.

Non-Pharmaceutical Samples & Products for Trial Use

It is the policy of Hunterdon Healthcare System that all new patient care products or substitute products (with the exception of pharmaceutical products) to be used at a Hunterdon facility will be evaluated for cost and quality by a Product Value Analysis Committee. This Committee will conduct a patient safety and product efficacy evaluation to ensure that there is a standardized review process before patient care products are recommended and purchased.

New Product Introductions

Vendor Representatives are responsible for scheduling an appointment with Purchasing to introduce new products **before** these products can be discussed with physicians or Hunterdon Medical Staff. The product must be left with Materials Management for review and evaluation by Product Value Analysis Committee whenever possible. Equipment/supplies furnished by the Vendor Rep must be in usable and unopened condition at the time it is brought into the hospital. Hunterdon Medical Center assumes no responsibility for supplies or equipment left by vendors in the organization for the purpose of evaluation. It is the responsibility

of the vendor, unless agreed to by the requesting department, to deliver, install, and remove the equipment or supplies upon completion of the evaluation.

The Department wishing to use the new or substitute product is responsible for completing a "New Product Request Form" and forwarding it to the Value Analysis Committee Chairperson or to the Purchasing Department.

The Committee will be responsible for conducting product trials and for reporting the trial's results back to the requesting department. Any time the product evaluation process surpasses 120 days, that product will be rejected. If a product is accepted, the product will be assigned a Hospital number to be entered into the Purchasing Department computer. that designates the year it was evaluated/approved. The product may now be ordered and used with patients.

Vendor Reps performing maintenance service on medical equipment must deliver a customer-signed service report to the Purchasing or Maintenance Department upon completion.

Clinical Equipment

Clinical equipment can only be brought in with a no charge purchase order (PO) and must go directly to Biomedical Engineering prior to the trial.

Removal of Product

The Vendor Rep cannot remove any supply, product, and equipment without authorization by Materials Management during visiting hours and by charge personnel after business hours. A product return document will be issued when returning equipment – for tracking purposes.

Product Recalls

Vendor Reps are required to notify the appropriate Department Manager about product recalls, with such notification to include identification of the product (including lot numbers affected and quantities removed from Hunterdon), the reason for the recall, and a copy of the recall or FDA information. Similar information about product substitutions must be provided to the Department Manager.

Vendor Interactions with Hunterdon Employees & Departments

Hunterdon Healthcare System is committed to conducting business on the principles of honesty, fairness, and the merits of a vendor's products or services. Neither the Vendor Rep nor anyone working on behalf of the Vendor Rep may offer or give money, gifts, gratuities, favors, entertainment, the opportunity to earn money, or other items of value to any person associated with Hunterdon Healthcare System or its Affiliates for the purpose of inducing such person to use, prescribe, or refer the Vendor Rep's products or services. Additionally, under no circumstances may a Hunterdon employee solicit a gift from a Vendor Rep whose products are billed to a federal healthcare program.

Vendor Reps are encouraged to follow the principles set forth by their own companies regarding interactions with health care providers. For Vendor Reps in the medical manufacturer industry, ethics codes established by AdvaMed, PhRMA, and NEMA provide excellent guidance and are being respected by Hunterdon Healthcare System.

Meals Provided to Employees

Hunterdon employees may accept meals from Vendor Reps under the following circumstances:

- The meals are modest and infrequent in nature.
- The meals do not include spouses or guests of Hunterdon employees, unless there is a business-related reason for doing so.
- The meal is provided as part of a business discussion or sales call conducted at a Hunterdon facility to discuss appropriate business topics such as product features, contracts, and sales terms.
- The meal is provided as part of a legitimate educational session focusing on a topic of interest to the invited Hunterdon employees. The value of the meal is modest; the venue is modest and conducive to learning; and the meal is subordinate in time and focus to the educational portion of the session.
- The meal is provided at a professional conference as part of a vendor-sponsored event.

Business meals provided to a Hunterdon employee at an off-site location are acceptable when such meals are infrequent, modest in value, reasonable, at an appropriate location conducive to business discussions, and does not incur travel and lodging expense.

Gifts to Employees

Vendor Reps may provide gifts to Hunterdon employees under the following conditions:

- With the exception of gifts provided in recognition of a major life event (if such gift-giving is an acceptable practice for the Vendor Rep's company), all gifts provided to Hunterdon employees must have an office-related use, patient benefit, or educational benefit and should be provided during a business discuss or educational session.
- Gifts intended to be passed on to patients for their use must be limited to \$10 per item (maximum \$50 per year) because of federal laws prohibiting gifts being transferred or offered to Medicare or Medicaid beneficiaries in excess of the \$10/\$50 limit.
- Gifts with an office use or educational benefit must be nominal or modest in value – not exceeding \$100.
- Nominal gifts are defined as items such as pens, note pads, coffee mugs, etc. bearing a product's name or the vendor's name.
- Gifts of a personal nature can be provided only in recognition of a major life event such as the birth or adoption of a child, marriage, or death and must be appropriate for the occasion being recognized.
- Consumable gifts, such as a December holiday gift basket, may be accepted by employees as long as the value is modest and the items are shared among department employees.
- Gifts provided in recognition of the December holiday season are allowable – as long as modest and not for the personal use of an individual employee.
- The gift must not be cash or a cash equivalent.

Unacceptable gifts include items such as sporting event tickets, gift certificates, and travel – even if the cost to the Vendor Rep is zero. The underlying principle is the fair market value of the gift – not the price paid by the Vendor Rep or vendor.

In-Service Training Sessions

All in-service must be on formulary items and **must** be approved by the Department Manager in advance of the training being conducted. Meals and gifts may be provided during these training sessions; refer to the paragraphs about gifts and meals.

Hands-On Product Training

Programs requiring “hands on” training about medical procedures, medical devices, or medical equipment must be held at training facilities, laboratories, hospitals, or other appropriate facilities conducive to learning. The training staff must possess the proper knowledge, skills, and certifications (if applicable) to conduct such training. Hunterdon employees may attend meals and receptions provided with product training programs, as long as the meals and receptions are modest in nature and subordinate in time and focus to the educational session. Reasonable travel and lodging costs may be paid for Hunterdon employees, provided that the

training is necessary to correctly employ the procedure, device, or equipment and is applicable to the employees' current job responsibilities. It is not acceptable to pay for guests of Hunterdon employees. Travel expenses to be absorbed by the vendor must be approved in advance by a Vice President of Hunterdon.

Educational Conferences Sponsored by Hunterdon

The following support may be provided by vendors for independent, scientific conferences that promote the safe, effective delivery of healthcare, scientific knowledge, or the advancement of medicine:

- **Educational Grants**

Vendors may provide an educational grant to the Hunterdon Medical Center Foundation to defray conference costs or allow medical students or other health care professionals to attend a specific conference. The conference must be scientific and/or educational in nature, and Hunterdon designates which health care professionals will attend, without undue influence from the vendor providing the grant.

- **Meals and Hospitality**

If in accordance with the vendor's approved practices, a vendor may provide funding to support a modest meal or reception at an educational conference, as long as the time and focus of the meal/reception is subordinate to the educational purpose of the conference.

- **Advertisements**

Vendors may purchase advertisements and lease booth space at conferences sponsored by Hunterdon Healthcare.

Pharmaceutical Manufacturer Representatives Conduct Policy

Vendor Representatives detailing pharmaceuticals, intravenous solutions, tubing or any item marked "Federal law prohibits dispensing without a prescription" shall deal directly with the Hunterdon Medical Center Department of Pharmaceutical Services.

1. Pharmaceutical Vendor Reps must schedule appointments by contacting the Pharmacy Secretary at (908) 788-6120.
2. Pharmaceutical Vendor Reps must report to the Pharmacy Office, which is located in the basement of Hunterdon Medical Center. The Pharmacy Secretary will then verify the representative's appointment and print a badge for the Vendor Rep.
3. Pharmaceutical Vendor Reps **MAY NOT** enter patient care areas, e.g.: Emergency room, Operating Room, Nursing Stations, and Anesthesia.
4. No samples, legend or over-the-counter product may be left in this facility. Any educational or promotional programs for prescribing medications must be registered in the Pharmacy prior to discussing with Hunterdon Medical Center Staff.
5. As new products become available, objective information shall be provided to the Pharmacy for further evaluation.
6. Only Formulary approved medications may be "Detailed" on Hunterdon Medical property. The Formulary status of a medication may be determined by contacting the Pharmacy Department.
7. Displays are not permitted in public areas. Funding for educational programs is encouraged. Speaker programs may be arranged through the Pharmacy or Medical Education Departments.
8. Hunterdon Medical Center has a "closed" formulary system. Non-Formulary medications are not available for use on patients in this facility. Requests for addition of items to the formulary must be initiated by a physician with privileges at this institution and reviewed by the Pharmacy and Therapeutics Committee. The requesting physician must contact the Pharmacy directly and provide appropriate documentation for P&T Committee consideration.
9. Violation of these policies by the Pharmaceutical Vendor Rep will result in expulsion from the institution and suspension of visiting privileges.

Vendor Representatives In Procedural Patient Care Areas

General Standards

Hunterdon Healthcare System recognizes the need for education and introduction of new technology, procedures, and techniques to health care professionals in the perioperative setting. At the same time, a patient's right to privacy and safety must be protected – particularly when a Vendor Rep is present during a surgical procedure. All Vendor Reps present in procedural areas must abide by the following general standards:

- A Vendor Rep may observe a procedure or **only** at the request of a physician performing the procedure.
- If a new medical product is being used, the product **must** be approved by Materials Management **before** the product can be introduced to the physician and/or other clinical staff and before the product can be used with a patient.
- Vendor Reps are **not** permitted to:
 - scrub in
 - assist with procedures (other than technical assistance in the form of verbal consultation)
 - open sterile products, or
 - have patient contact
- Vendor Reps or Technical Support Reps with specialized training may perform remote calibration of their company's products – e.g., pacemakers and pain management devices – to the physician's specifications.
- A Vendor Rep's presence during a surgical procedure is to be recorded in documentation of a patient's surgical procedure.
- Sales calls with physicians must be conducted in non-patient care areas only.

Required Documentation & Competencies

A Vendor Rep that is present in the **operating room, catherization lab, or other procedural patient care areas** during a procedure are REQUIRED to maintain documentation of certain competencies, health status, and background checks on file with Hunterdon.

The Vendor Rep must provide the following documentation in advance of being granted access to a procedure:

- Educational training and/or certification of the products/services the Vendor Rep is authorized to perform
- Competency assessments for the products/services provided: Evidence of the Vendor Rep's comprehension and retention of the training received
- Pre-employment background checks, including criminal background checks and drug testing
- Liability (or Malpractice) Insurance Certificates
- Documentation of Education/Training for the following areas:

- Aseptic Principles and Infection Control
- Bloodborne Pathogens
- Sterile Techniques
- Product Complaints and Medical Device Reporting (MDR) requirements
- Product Recall Processes
- Patient Rights, Confidentiality, and HIPAA
- Documentation of Vendor Rep's Current Status for the following:
 - MMR (Measles, Mumps and Rubella) Vaccination
 - Hepatitis B Vaccination
 - History of Varicella (Chickenpox)
 - TB Testing (if positive, documentation of chest x-ray)

Operating Room Standards

Purpose: To protect the rights and confidentiality of our surgical patients and to eliminate unauthorized solicitation by Vendor Reps accessing the Operating Room.

For the purpose of this document, Vendor Representatives are included in the group referred to as "non-medical advisors".

1. Non-medical advisors may be present in the Operating Room **only** with the advance approval/request of the physician performing the procedure. **No walk-ins will be accepted.**
2. Non-medical advisors must **first** check-in with the Materials Management Department or at a self-service kiosk prior to arriving in the Operating Room area.
3. When entering the Operating Room non-medical vendor advisors will:
 - a. Approach the O.R. front desk.
 - b. Leave a business card that is to be given to the appropriate Circulating Nurse.
 - c. Have their Hunterdon-issued badge displayed prominently at all times.
 - d. Be suitably attired, according to Hunterdon Medical Center's Operating Room policies.
 - e. Leave brief cases/bags in the Assistant Director's Office. They are not to be taken into the Center Core or Operating Rooms.
 - f. Turn off cell phone. **Cell phone use is not allowed anywhere in the Operating Room.** A cell phone will affect some ventilators and monitors that are in use.
 - g. Adhere to the Hunterdon Medical Center standards of confidentiality and Infection Control.
 - h. Not be allowed to participate in the actual procedure or make any adjustments to equipment used during the cases.
 - i. Not be allowed to open sterile supplies and implants.
 - j. Enter the Operating Rooms through the scrub area.

- k. Enter the Operating Room only after induction of anesthesia or unless invited by the Surgeon prior to induction of anesthesia.
- l. As an invited guest they will function under the direction of the Circulating Nurse and the Director of Surgical Services. Noncompliance to directions from either of the nurses could result in removal from the OR.

AORN Position Statement

The Role of the Health Care Industry Representative in the Perioperative/Invasive Procedure Setting

PREAMBLE

AORN recognizes the need for a structured process for education, training, and introduction of procedures, techniques, technology, and equipment to health care professionals practicing within the perioperative/invasive procedure setting. By virtue of their training, knowledge, and expertise, health care industry representatives can provide technical support to the surgical team to expedite the procedure and facilitate desired patient outcomes. Health care industry representatives may function in any of several positions (e.g., clinical consultants, sales representatives, technicians, or repair/maintenance personnel). The primary responsibility of the perioperative registered nurse is to ensure the safety of patients undergoing operative or other invasive procedures. Core nursing activities that, by licensure, may not be performed by non-nurses are assessment, diagnosis, outcome identification, planning, and evaluation.

The surgical setting is one of the most potentially hazardous of all clinical environments and is subject to strict regulations, clinical practice guidelines and standards of care to preserve patient safety. It is important that the health care industry representative understands how to safely work in the operating room to assist the perioperative team in maintaining the patient's safety, right to privacy, and confidentiality when a health care industry representative is present during a surgical procedure.

POSITION STATEMENT

AORN supports the education of perioperative team members on new procedures, techniques, technology, and equipment with which personnel are not familiar before their use in a surgical procedure. AORN believes the following.

- The RN is accountable for the patient's nursing care during the procedure and advocates for the patient's safety, privacy, dignity, and confidentiality.
- Health care industry representatives may be permitted in the perioperative setting to provide technical support in accordance with facility policies, local, state, and federal regulations.
- Health care industry representatives should not provide direct patient care or be allowed in the sterile field. However, AORN believes the health care industry representative with specialized training and facility approval may perform calibration/synchronization to adjust/ program devices (such as but not limited to implanted electronic devices, radio frequency devices and lasers) under the supervision of the physician.

- Patients have a right to be informed about the presence of a health care industry representative in the perioperative/invasive procedure setting during a surgical procedure according to local, state, and federal regulations.²
- Health care facilities should incorporate the local, state, and federal regulations regarding health care industry representatives in the perioperative/invasive procedure setting.

Disciplinary Action

Vendor Reps who do not adhere to Hunterdon's policies will be subject to remedial actions ranging from suspension to permanent dismissal of rights to conduct business with Hunterdon on behalf of their companies. Because Hunterdon does not want to hinder the delivery of patient care, the Vendor Rep's company may assign another Vendor Rep to service Hunterdon during the suspension or permanent dismissal of the Vendor Rep violating Hunterdon's policies.

- First Violation: Written notification of a 60-day suspension of facility visits and selling for the Vendor Rep committing the violation.
- Second Violation: Written notification of a one (1) year suspension of business interactions with Hunterdon for the Vendor Rep.
- Third Violation: Written notification of a permanent ban of business interactions at Hunterdon by the Vendor Rep committing the offense.

Required Documentation Checklist for Vendor Reps

The following table represents a summary of documentation and competencies that are required for specific groups of vendor representatives. You may find it helpful to refer to this page in preparing your registration package.

	Pharmaceutical Reps	Reps in Procedural Areas (OR, Cath Labs, Etc.)	Medical Equipment Service Personnel or Clinical Service Techs	General Maintenance or Repair Personnel
Health Status or Immunizations				
MMR (Mumps, Rubella, Rubeola)		X		
History of Chickenpox (Varicella)		X		
TB Skin Test (Chest X-Ray if positive)		X		
Education/Training				
Products/Services being provided	X	X	X	X
Competency Assessment on Product Knowledge	X	X	X	X
Pre-Employment Screening of Criminal Background Check	X	X	X	X
Pre-Employment Drug Testing	X	X	X	X
Bloodborne Pathogens		X		
Compliance/Ethics	X	X	X	X
HIPAA, Patient Privacy, Patient Rights	X	X	X	X
Liability Insurance	X	X	X	X
Photograph (Recent Head Shot) for Badge	X	X	X	X

Notes