

# *Supplier Policies and Procedures*

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## Supplier Relations Policy Summary

- All patient health information must be confidential.
- Intermountain reserves the right to revoke Supplier access for cause in its sole discretion.
- Supplier access is controlled and monitored in Intermountain facilities and entities.
- Intermountain facilities and entities designate locations where Suppliers may meet with clinicians and employees to avoid interference with patient care and employees' duties.
- Gifts of any kind from Suppliers are **discouraged and never solicited** including items such as pens, books, note pads, clocks, holiday gifts, promotional items, or any other articles, and entertainment. Such items should never be used in Intermountain facilities or entities.
  - Suppliers may make donations to a general educational fund at Intermountain. These funds are available to all departments to support training and other educational activities. Donations are coordinated through the facility or entity's administration to determine their use.
  - Gifts do not include donations to Intermountain foundations or related capital fundraising efforts.

- Meals or snacks provided by Suppliers are **discouraged and never solicited**, but may be held if there is a legitimate educational or business purpose to justify the event.
  - The value of such meals should be modest and the occasions for them should be infrequent. Weekly or monthly meals from the same Suppliers throughout the year are generally deemed unnecessary and may be considered abusive of this policy.
- Suppliers may pay for Intermountain staff to visit their site to demonstrate products, services, equipment, and the like when it is not feasible or practical for the Supplier to conduct such demonstrations at Intermountain locations. Suppliers may pay for the reasonable cost of Intermountain employee travel, food, and lodging in these instances.
  - Only Intermountain staff who are essential to evaluate the Supplier's demonstration may attend.
  - Supplier site visits must be approved in advance by the prospective attendee's manager and coordinated through, and approved by, the Supply Chain Organization. If the prospective attendee's manager is also invited to attend, the next higher level manager will review the proposal.
- Individuals who are not employed by Intermountain are not permitted to solicit employees, patients, or visitors, or to distribute literature and material for any purpose in any building owned or managed by Intermountain.
  - Suppliers may not distribute literature directly to patients or their families or leave them in areas accessible to them without permission.
  - Such literature must be given to a department manager or director for review, after which Intermountain may, at its sole discretion, distribute the materials deemed useful to patients or their families.
- Medical or non-medical equipment, supplies, or services may only be purchased through approved purchasing processes.
  - Suppliers may not provide equipment, supplies, or services in response to any order from staff unless it has been placed through approved purchasing processes.
  - Intermountain reserves the right to refuse payment for equipment, supplies, or services which have not been purchased through approved purchasing processes.
- The use of medical supplies and device samples must be coordinated with the Supply Chain Organization.

# Access Control Supplier Procedure Summary

This procedure establishes the requirements supplier representatives must satisfy to enter Intermountain hospitals and Homecare facilities.

- Supplier Representatives requesting access to Intermountain facilities must use Intermountain's supplier registration tool (Reptrax) and fulfill all requirements on an annual basis according to the *Supplier Registration Procedure*.
  - Individuals who deliver or maintain a product or service in high risk areas as defined in the *Facility Access Policy* must complete the supplier registration process and be escorted by an employee.
  - Individuals who deliver or maintain a product or service in medium risk areas as defined by the *Facility Access Policy* must sign an electronic attestation and complete the supplier registration process through Intermountain's supplier registration tool (Reptrax).
- Supplier Representatives must check-in at a supplier kiosk or with facility supply chain personnel to obtain a disposable, time-stamped identification badge. Supplier identification badges must be worn in the upper torso area while in facilities.
- Appropriate behavior is expected from Supplier Representatives at all times (see Supplier Behavior Code).
- Supplier representatives who do not complete the registration process or who do not conduct themselves in a manner consistent with Intermountain's Supplier Behavior Code may be subject to sanctions according to the supplier sanction review process.

## Supplier Registration Procedure Summary

This procedure describes supplier representative registration requirements to be completed prior to entering Intermountain hospitals, hospital-based clinics and Homecare facilities.

- Supplier Representatives requesting access to Intermountain facilities must register using Intermountain's online registration tool (Reptrax) prior to entering an

Intermountain facility for the purpose of representing or providing a product or service to Intermountain patients, employees, or affiliated practitioners.

- To register, Supplier Representatives must certify, and in some cases provide documentation, they have:
  - Read the provided Intermountain policies and procedures
  - Watched the applicable orientation videos and passed the applicable quizzes
  - Received the required immunizations and that they are current (documentation required)
  - Received comprehensive, annual training for the products or services they represent (documentation required)
  - Passed a national criminal background check (documentation required)
  - Agreed to keep PHI, employee information, and proprietary information confidential
  - Verified whether a Business Associate Agreement is required or not
  - Agreed to submit "bill only" case documentation and implant records to a designated Intermountain Healthcare employee before leaving the facility premises.
  - Agreed to comply with Utah occupational safety and health requirements for health care providers and requirements applicable to their specific occupation.
  - Comply with Intermountain's Hazardous Materials Policy and assure that any chemicals brought onto Intermountain property have been approved and are in the facility's chemical inventory database.
- Supplier Representatives requesting access to surgical areas must also provide documented evidence of training on the following:
  - Infection control, aseptic practices, and blood borne pathogens
  - Intermountain's patient rights, confidentiality, and patient privacy policies
  - Human tissue storage and handling
- An Office of Inspector General (OIG) and System for Award Management (SAM) exclusion review is performed for each Supplier Representative as part of the registration process.
- A Supplier representative's failure to register may result in sanctions or permanent removal from Intermountain facilities.
- Supplier registration requirements are not intended to modify the Supplier's contractual obligations.

# Supplier Code of Behavior Summary

Intermountain wants to assure that we practice the highest ethical and objective standards. We would like to remind everyone of Intermountain Healthcare supplier guidelines which will help with our continued success.

- Suppliers must have a formal appointment through an appropriate Intermountain employee.
- Suppliers must complete all the Reprax requirements, be approved, and obtain a sticker identification badge validating their appointment. The identification badge must always be worn in a visible location.
- Supplier check-in must occur at either a supplier kiosk, in the Supply Chain office, or at the OR/Cath lab front desk.
- Meetings with suppliers are to be held outside of patient care units and departments.
- Suppliers are not allowed in lounges, patient waiting areas, etc.
- Fax machines, copiers and phones are not to be used by suppliers unless essential for patient care.
- Products, equipment, and/or services that are not contracted or approved by Intermountain in advance and in writing are not allowed and Intermountain may refuse payment for such items.
- Suppliers providing loaned instrument sets to Intermountain facilities must deliver those sets 24 hours prior to the scheduled procedure start time to allow for inspection and sterilization of the instrument sets.
- Only technical or clinical support personnel are allowed in room during a clinical procedure at the specific request of the physician and the department manager or designee.
- No inducements are accepted (food, gifts, cash, entertainment, etc.) to assure objectivity and highest ethics in decision making.
- It is inappropriate to enter occupied patient rooms without express permission of the patient and the nurse manager for the area involved.
- Removal of any equipment or products without prior approval by the department director or designee is prohibited.
- Soliciting business from patients and non-management Intermountain staff is not allowed.
- All information related to patient care (protected health information) employee information, intellectual property, and proprietary information is confidential.
- The use of photography or recording devices is strictly prohibited.
- Cell phones must be silenced and not present distraction.
- Intermountain is a harassment free workplace.
- Intermountain prohibits violence and disruptive behavior in the workplace.
- Personal appearance must be in accordance with business standards.
- Suppliers accessing operating rooms will utilize hospital laundered scrubs. Scrubs must be returned prior to leaving the surgical services area.
- Suppliers accessing operating rooms will not wear any form of fingernail polish, artificial fingernails, or extenders. Fingernails will be natural, clean, and short at the tip.
- Suppliers must abstain from using tobacco products while at Intermountain facilities and

properties in accordance with Intermountain's commitment to maintain tobacco-free environments.

## Facility Access Policy Summary

Intermountain controls access to its facilities in order to provide an environment that promotes the safety of staff, patients, and visitors and safeguards company property and personal information.

- Unsupervised, non-public, exterior building entrances have Proxy Access control or key locks and are secured against unauthorized entry 24 hours per day, 7 days per week. Facilities are required to have a key control program with processes to track who keys are issued to and when they are returned.
- With the exception of visitors (as described in the Facility Access Classification Table) and patients, individuals entering a Facility are expected to dress appropriately and are required to wear identification while in the Facility.
  - Intermountain Healthcare and SelectHealth identification badges with Proxy Access are issued only after satisfactory completion of Screening and Immunization Requirements and required Orientation and Education as described in the Facility Access Classification Table found in Secondary Materials below.
    - Suppliers, Construction/Technicians and Contingent Workforce should refer to the *Facility Access Supplier Procedure*.
    - Access to freestanding Medical Group clinics is according to the *Access Control Medical Group Procedure*.
    - Facilities may implement more stringent visitor identification requirements.
- Loitering is not allowed in Facilities.
- Individuals entering Facilities are classified as low, medium, or high risk for security purposes based on the purpose, duration, and location of their visit as noted below:
  - Low Risk
    - Business areas of a Facility (Intermountain invited guest)
    - Patient Care Areas (patient invited guest)
  - Medium Risk
    - Patient Care Areas (not participating in direct patient care)
    - Non patient care areas with access to Intermountain assets or protected information

- Patient Care Areas or non patient care areas (fulfilling a business need)
  - High Risk
    - Patient Care Areas (participating in direct patient care)
    - Security Sensitive Areas
- Proxy Access is granted according to the *Proxy Access Procedure*.
  - Proxy Access is only permitted to authorized individuals.
  - Proxy Access is only allowed for the duration necessary.
- Facility security personnel are notified when Emergency Access to a Facility is required.
- In the event of a disaster, access to a Facility is according to each facility's emergency operations plan.

## Sustainable Procurement Policy

This policy is intended to identify sustainability principles that shall be incorporated into procurement decisions, provide implementation guidance, and ensure all areas work to align programs and purchases with this policy to ensure the greatest impact. Intermountain Healthcare strongly prefers products and services that integrate community and environmental stewardship through a process that considers the economic, environmental and social impacts of the organization. To help focus on these areas, programs have been created around local suppliers, diverse suppliers, and sustainability for the environment to promote health and places of healing. Intermountain and suppliers will work together to positively impact the following areas, as well as other relevant topics:

- Water and Energy usage, Air Quality
- Natural Resources and minimizing Chemicals of Concern usage
- Waste Creation through Reducing, Reusing, and Recycling
- Packaging and Transportation
- Total Cost of Ownership
- Local and Diverse Sourcing

By being good stewards through the careful and responsible management of the environment and by doing what is right for people, we will help people live the healthiest lives possible. Intermountain Healthcare and the people we serve count on suppliers to heed this policy and see it as encouragement to innovate to meet and exceed our expectations.

# Non-Discrimination Policy

Intermountain Healthcare complies with applicable federal civil rights laws and does not discriminate against any individual on the basis of age, race, color, ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, and/or veteran status in admission, treatment, participation, or receipt of the services and benefits under any of its health programs and activities, and in staff and employee assignments to patients, whether carried out by Intermountain Healthcare directly or through a contractor or any other entity with which Intermountain Healthcare arranges to carry out its programs and activities.

Intermountain Healthcare will provide appropriate auxiliary aids and services to individuals with disabilities and language assistance services to individuals with limited English proficiency when needed to ensure equal opportunity and meaningful access to the Intermountain's health programs, services, and activities. Examples of aids and services include, but are not limited to, qualified sign language interpreters, written information in alternate formats, foreign language interpreters and information translated into other languages. Intermountain Healthcare will provide aids and services in a timely manner and free of charge. If you need these services, please contact the 504/Civil Rights Coordinator.

If an individual believes discrimination has occurred, a grievance can be filed with Intermountain Healthcare by contacting Intermountain's 504/Civil Rights Coordinator within 60 days of the incident.

Discrimination complaints can also be filed with the U.S. Department of Health and Human Services Office for Civil Rights via phone, through the [Civil Rights Complaint Portal](#), by fax, or by mail. Complaint forms are available [here](#).