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Next Review 8/8/2023

Owner Kari Adank: Vice President
Area Corporate - Compliance and Ethics
Applicability Gundersen System Wide (All-Sites)
References Policy

Vendor Visitation and Interaction, GL-3044

References

Not Applicable

Applicable To

This policy applies to Gundersen Health System, Gundersen Lutheran Medical Center, Gundersen Clinic, Ltd, Gundersen Boscobel Area Hospital and Clinics, Gundersen Moundview Hospital and Clinics, Gundersen Palmer Lutheran Hospital and Clinics, Gundersen St. Elizabeth's Hospital and Clinics, Gundersen St. Joseph's Hospital and Clinics and Gundersen Tri-County Hospital and Clinics (hereinafter collectively referred to as "Gundersen"). Note that the processes described herein related to GHX Vendormate apply only to those Affiliates which have implemented GHX Vendormate.

Purpose Statement

Admittance to Gundersen locations of business by a vendor is a privilege, not a right. Vendors that conduct business with Gundersen must do so in accordance with this policy and all other Purchasing Department and other applicable Gundersen policies.

Actual or alleged violations of this policy may also be reported on an anonymous basis to Gundersen's Compliance Hotline:

Local Phone Number	(608) 784-0477
Toll-Free Number	(877) 532-8879
Email	Available on Gladiator, Gundersen's Intranet

Definitions

Campus shall mean all property owned or rented for occupancy by Gundersen Health System, Inc. and its affiliates.

Gift is considered anything of monetary value such as a gratuity, favor, entertainment, loan, reward, pens, notepads, meals, other food items, or any vendor promotional items, such as items with a Vendor logo or items promoting a vendor's product or service.

Exclusions from the definition of a Gift (these items are acceptable and may be received by employees):

1. Genuine educational materials such as textbooks, pamphlets, medical journals or models, if the materials benefit the organization or patients. (Note: These items are acceptable even if they include the Vendor's logo).
2. Reasonable honoraria and reimbursement for reasonable travel, lodging, registration fees and meal expenses when staff serves as a legitimate faculty member at a professional meeting or continuing education conference.
3. After hours off-campus or off-site meals or entertainment activities or events sponsored by Vendors if the meal or activity is modest (less than \$50 per meal and \$338 in the aggregate per year) and when educational meetings occur in conjunction with such meal. (Note: On-campus food, drink or meals provided by Vendors is prohibited).
4. Samples requested or used for patient care activities or legitimate business purposes if allowed by the department or regional clinic.
5. Items provided at a discount as part of a Gundersen contract.
6. A rebate or discount that is made in the regular course of business to members of the public without regard to their status as a Gundersen staff member (e.g., a coupon in the newspaper for a discount on a pain reliever).
7. Items with vendor name or logo provided by the organizers of a professional meeting that are available to all attendees when the meeting is conducted under national continuing education accreditation body guidelines (e.g., a tote bag with a Vendor's name on it). However, such items may not be brought onto Gundersen premises.
8. Vendor or patient donations (product or monetary) to Gundersen Foundation.
9. Non-monetary industry or professional awards.

Gundersen Foundation shall mean Gundersen Medical Foundation and an Affiliate's Foundation.

Vendor is a company or its representative or the agent of a company that either produces or markets: drugs; devices; nutritional products; other products or services; information technology software or hardware equipment; or who serves as a consultant.

Vendor certification process is the on-line vendor management registration, certification and educational process that vendors must participate in to conduct business with Gundersen.

The vendor certification process, as defined herein, does not apply to vendors who have been classified as exempt by the Purchasing Department. Examples of exempt vendors include:

1. City, county, state and federal agencies
2. Corporate entities who provide legal or financial services to Gundersen
3. Representatives of the Joint Commission and other regulatory agencies
4. Potential vendors

NOTE: A complete listing of exceptions will be maintained in writing by the Purchasing Department.

Implementation

	Responsible Party/Action
General	<p>Unless exempt from the vendor certification process, vendors are required to register in the on-line vendor management program operated by GHX/Vendormate, Inc. The registration website address is: www.gundersenhealth.org/vendor. All registration fees are paid by the vendor directly to GHX/Vendormate, Inc., and registration must be renewed every 12 months. Registration fees are non-refundable.</p> <p>Vendor companies who are not exempt and who choose not to participate in the vendor certification program will not be selected as an approved supplier for Gundersen.</p> <p>Each vendor company may be required to provide documentation during the vendor certification program specific to the vendor's risk category in order to be credentialed for doing business with Gundersen.</p>
	<p>Vendors who do not provide all required documentation during the registration process will not be authorized to conduct business at Gundersen until all registration requirements are met.</p> <p>Vendors must acknowledge adherence to all required policies and statements during the GHX/Vendormate registration process. These documents may include but are not limited to:</p> <ol style="list-style-type: none"> 1. Compliance Policies & Standards of Conduct 2. Business Associate Agreements and/or other Confidentiality Statements 3. Purchasing Policies 4. Vendor Visitation and Interaction Policy 5. Requirements for Vendor Representatives in Patient Care Areas, if applicable 6. Safety Policies, if applicable 7. Cell Phone Usage Policy 8. SUD Reprocessing Policy

	<ol style="list-style-type: none"> 9. Parking Policy 10. Vendors must upload proof of COVID-19 vaccination status.
Vendor Representative Sign In / Sign Out	<p>Vendor representative shall sign in and out of GHX/Vendormate at one of the following locations on the day of their visit to receive a vendor identification badge:</p> <ol style="list-style-type: none"> 1. ICE House - Main Entrance 2. Information desk - Gundersen Clinic/Hospital (corridor connecting clinic and hospital, next to Clinic Pharmacy) 3. Information desk - East Building lobby 4. Information desk - Onalaska Gundersen Clinic main floor 5. Reception desk - Onalaska Services Support Building 6. Patient Liaison desk - Gundersen Regional Clinics and other regional locations including, but not limited to: vision clinics, renal dialysis locations, and behavioral health locations 7. West Salem Consolidated Service Center 8. La Crosse Heritage Lower Level - by scrub machines 9. Locations identified within Gundersen's Critical Access Hospitals. <p>The identification badge must be worn at all times and clearly displayed during the entire time the vendor representative is on-site. After the visit, the vendor representative returns to any of the above locations and must turn in their badge and sign out of GHX/Vendormate. Identification badges are valid for one day only.</p>
Access	<p>Vendors may set up booths on campus to promote retail (non-covered) products or services only and only if, the following criteria are met:</p> <ol style="list-style-type: none"> 1. Must be in conjunction with a Gundersen sponsored educational event. On campus vendors booths at non-educational events may be permitted with prior approval by the Compliance Office. 2. Vendors must be registered in Vendormate and adhere to sign in/out requirements. 3. Permitted for retail (non-covered) products or services only. 4. Giving of promotional gift items is not permitted. 5. Not permitted for insurance covered products or services.
Food & Beverage	<p>Food or drink provided by or paid for by vendors is prohibited at Gundersen locations.</p>

Displays	Vendors cannot place information in mailboxes of staff or post materials on bulletin boards within any Gundersen location. Vendors may provide only requested information.
Promotional Activities	<p>Incentive programs, raffles, lotteries or contests which result in gifts to the winner are forbidden.</p> <p>Vendors are not allowed to distribute or post unsolicited printed or handwritten material, advertisements or signs at any Gundersen location.</p> <p>Promotion of drugs against established drug policies is strictly prohibited. Vendors who discuss such agents will be suspended from visiting Gundersen locations pending review of the event.</p> <p>Preprinted prescription pads from Vendors are not permitted at any Gundersen location.</p>
Samples	Samples are controlled by GL-6018, <i>Pharmaceutical Samples</i> .
Educational Programs	<p>Vendors shall not attend programs in which specific patients are identified or when quality assurance or risk management issues are presented.</p> <p>Donations must be coordinated through Gundersen Medical Foundation. Vendors shall contact Gundersen Medical Foundation directly if they are interested in making a donation.</p> <p>Continuing education donations should be made through Gundersen Medical Foundation. Educational materials should be balanced in presentation and should not directly market a product or company; however, the educational material can include the creators name and company.</p>
Grants/Gifts	<p>Gifts, as defined herein, are not permitted at any Gundersen location nor shall they be given to any employee.</p> <p>Educational grants must go through the Gundersen Medical Foundation.</p>
Confidentiality	<p>Vendors shall not attend programs in which specific patients are discussed or when quality assurance or risk management issues are presented.</p> <p>Employees shall not share, information from a patient's chart, internal reports, communications, minutes, or other documents intended for internal distribution with vendors. Except as described in the policy entitled <i>Requirements for Vendor Representatives in Patient Care Areas.</i>, surgical or patient schedules shall not be shared with vendors.</p> <p>Vendors shall not solicit competitive cost information from Gundersen</p>

	employees.
Compliance	Employees shall report actual or alleged violations of these guidelines to the Purchasing Department, Security Department or the Compliance Office.
	Actual or alleged violations of this policy also may be reported on an anonymous basis to Gundersen's Compliance Hotline:
	Local Phone Number (608) 784-0477
	Toll-Free Number (877) 532-8879
	Email Available on Gladiator, Gundersen's Intranet
	Reported violations of this policy will be investigated by the Compliance Office.
	Vendors who violate this policy will be addressed as follows:
	<ul style="list-style-type: none"> • 1st violation - Warning letter to the individual and their supervisor, and may also lead to visitation privileges suspended for 30 days. • 2nd violation - Visitation privileges suspended for 30 days • 3rd violation - Barred from the facility permanently

Responsibilities

Application of this policy and ongoing monitoring is the responsibility of all Gundersen employees (see Related Documents section). Gundersen employees are expected to uphold the highest professional standards in interactions with all vendors and must report actual or alleged violations of these guidelines to the Purchasing Department, Security Department or the Compliance Office.

Approval Signatures

Step Description	Approver	Date
MD	Michael Dolan: MD	8/8/2022
General Counsel	Daniel Lilly: General Counsel	8/3/2022
Vice President	Kari Adank: Vice President	8/3/2022
Policy Review Committee	Sarah Melde: Manager	8/3/2022
	Kari Adank: Vice President	8/3/2022