

ARCHBOLD MEDICAL CENTER

COMPLIANCE STANDARDS FOR VENDORS

Introduction

It is the policy of Archbold Medical Center (the "Medical Center") that all employees, medical staff members, referral sources, and other business contacts will demonstrate high ethical standards and comply with all federal and state laws which may apply to any aspect of the Medical Center's operations when conducting activities with, at, or concerning the Medical Center.

The Medical Center has designed and implemented a formal corporate compliance program in support of its long-standing tradition of providing needed health care services to the community in an ethical and legal manner. As a condition of a vendor's initial and continued association with the Medical Center, a vendor is required to comply with these compliance standards for vendors. In addition, if a vendor is acting as an independent contractor that employs personnel who regularly furnish patient care, billing or accounting related services on the premises of any Medical Center entity, the vendor also is required to assure that such employees comply with the Medical Center's Code of Conduct for All Employees. This information is accessible on the Medical Center's website at www.archbold.org by clicking on Vendor Information at the bottom of the homepage. Violation by a vendor's employees of the standards and procedures contained in the Code of Conduct for All Employees may result in the termination of a vendor's association with the Medical Center.

Standards

For purposes of the following standards, the phrase, "any person associated with the Medical Center," means or includes employees, board members, as well as members of the medical staff who participate in the selection of the type and/or vendor of medical supplies or devices purchased by the Medical Center.

Money, Gifts, Gratuities, Favors, Entertainment, and Other Vendor-Sponsored Activities

- A vendor will not offer or give money, gifts, gratuities, favors, entertainment, or other such activities to any person associated with the Medical Center in order to influence such person in making decisions regarding the use of the vendor's products or services, or the referral or recommendation of patients to the vendor.
- A vendor will not offer or give money, gifts, gratuities, favors, entertainment, or other such activities to any person associated with the Medical Center to induce such person to forego normal business or professional considerations in making decisions that affect the Medical Center.

- A vendor will not offer any person associated with the Medical Center compensation, such as, but not limited to, honorariums, payment for consulting arrangements or completion of various product or evaluation surveys.
- A vendor will not offer any person associated with the Medical Center payment of expenditures such as, but not limited to, education or travel expenses.
- A vendor will not solicit or accept money, gifts, gratuities, favors, entertainment, or other such activities offered to induce the vendor to forego normal business or professional considerations in making decisions that affect the Medical Center.
- A vendor will not offer or give any gift or entertainment that exceeds the value of \$25.00 to any person associated with the Medical Center who may control or exercise influence over the vendor's association with the Medical Center, unless the gift or entertainment can be consumed or fully used at the time it is offered.
- In any 12-month period, a vendor will not offer or accept gifts, lunches, dinners, or entertainment with an aggregate value in excess of \$100.00 to or from any person associated with the Medical Center who may control or exercise influence over the vendor's association with the Medical Center.
- A vendor will never offer or give money to any person associated with the Medical Center who may control or exercise influence over the vendor's association with the Medical Center.
- A vendor may be requested to submit an accounting of expenditures, money, gifts, gratuities, entertainment, educational activities or research offered or given to any person associated with the Medical Center. The President of the Medical Center may periodically request this accounting.

Charitable Contributions

- A vendor may make charitable contributions to the Medical Center in the same manner and under the same conditions as other entities.
- Although a vendor's charitable contribution will be greatly appreciated, it will not affect the Medical Center's professional judgment regarding the goods or services it purchases, recommends, or provides to its patients.
- If a vendor wishes to make a charitable contribution, the vendor must contact the President of Archbold Foundation or the President of Archbold Medical Center.

Compliance With the Law and Recordkeeping

- A vendor must comply with all laws and legal requirements applicable to the vendor's provision of services or supplies to the Medical Center.
- A vendor will ensure that all of the vendor's billing statements and invoices accurately reflect the services and supplies provided and the correct charges for those services and supplies.
- A vendor will not intentionally, knowingly or recklessly prepare or submit false, fraudulent or misleading claims or make false statements to any government entity or third party payor in connection with the vendor's provision of services or supplies to the Medical Center.
- A vendor will maintain adequate and accurate documentation and records supporting the services and supplies provided to the Medical Center and the charges billed to the Medical Center.
- A vendor will protect the confidentiality of sensitive patient information and avoid disclosure of that information unless supported by legitimate business purposes and permitted by law.

Employment of Medical Center Personnel

- Although a vendor may offer employment to Medical Center personnel, vendor agrees that such personnel will not be permitted to conduct the vendor's business directly with the Medical Center, or any other Medical Center personnel, for a period of two years following employment by the vendor.

Education About False Claim Recoveries

- Section 6032 of the Federal Deficit Reduction Act mandates that contractors and agents are aware of the Medical Center's policy regarding "Education About False Claims Recoveries." This information is accessible from the Medical Center's website, www.archbold.org, by clicking on the "Vendor Information" link at the bottom of the homepage and then selecting "Education About False Claims Recoveries."