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I. PURPOSE

The purpose of this policy is to establish clear and consistent rules governing Vendor and Vendor Representative activities while conducting business with the Aurora Health Care system ("Aurora").

II. SCOPE

This policy applies to Aurora Health Care, Inc. and any entity or facility owned or controlled by Aurora Health Care. This policy applies to all Vendor and Vendor Representative activities; provided, however, that the approach to applying certain portions of this policy may vary as stipulated in underlying contractual agreements or as stated elsewhere in this policy. ASL (defined below) will serve as the arbitrator if any elements of this policy or its application are in dispute. This policy does not apply to the activities of private individuals, physicians or companies that lease Aurora property unless otherwise agreed upon between Aurora and those individuals, physicians or companies.

III. DEFINITIONS

"ASL" shall mean the Aurora System Logistics Department.

"Vendor" shall mean any individual or entity doing business with Aurora or soliciting business with Aurora.

"Vendor Credentialing System" shall mean Aurora's electronic vendor credentialing system (currently REPTrax).

"Vendor Representative" shall mean any employee, agent or other representative of a Vendor.


IV. POLICY

A. Certification and Registration.

1. All Vendors must be certified with ASL prior to engaging in business activities (including, without limitation, promotional or informational activities) with Aurora. To become a certified Vendor, please contact Aurora's Manager, Supply Contracts.
2. All Vendor Representatives must be registered with ASL and its Vendor Credentialing System prior to engaging in business activities (including, without limitation, promotional or informational activities) with Aurora. To become a registered Vendor Representative, please contact Aurora's Manager, Supply Contracts. In order to be registered, Vendor Representatives must meet all Aurora screening requirements (background checks, documentation of tuberculosis testing and any other requirements identified by Aurora). Aurora will communicate these requirements through its Vendor Credentialing System.

B. Appointments.

1. All Vendor Representatives visiting an Aurora location for business activities must have a pre-scheduled appointment for such visit - Vendor Representatives are not permitted to enter an Aurora location without a scheduled appointment.

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2. Appointments may be scheduled in advance by telephone, email or mail at the discretion of the department but Vendor Representatives are not allowed to visit the department or area to make an appointment.
3. If the Aurora location contains a Vendor Credentialing System kiosk, the Vendor Representative must sign-in before the appointment and sign-out after the appointment at kiosk. Vendor Representatives are only permitted to visit the individuals with whom the appointment has been scheduled – unscheduled “drop-in” visits are a violation of this policy.
4. Vendor Representatives must leave the Aurora location promptly upon completion of the scheduled appointment.

C. Identification.


1. If Aurora makes an identification badge available to a Vendor Representative (via Aurora’s Vendor Credentialing System or otherwise), it must be visibly worn at all times while on Aurora property.
2. If Aurora does not make an identification badge available to a Vendor Representative, the Vendor must provide an identification badge to its Vendor Representatives, and it must be visibly worn at all times while on Aurora property.

D. Vendor Access to Patient Care Areas.

1. Vendor Representatives are not allowed to access patient care areas unless specifically invited by Aurora clinical staff for the following limited purposes:
 - a. To conduct in-servicing, training and education with respect to a new product; or
 - b. To provide technical consultation for complex procedures, as requested by Aurora clinical staff or physicians.
2. In the limited circumstances permitted above, Vendor Representatives must meet the following requirements:
 - a. Vendor Representatives must check in as required by the particular department’s procedures and must be accompanied by Aurora employees at all times.
 - b. Vendor Representatives are permitted to offer technical advice to the surgical/procedure team regarding the Vendor’s products, but are NOT permitted to operate the product during the procedure or directly participate in the procedure in any manner, unless such activities are specifically authorized pursuant to a written agreement between Vendor and Aurora.
 - c. Vendor Representatives shall have no direct (i.e., physical or verbal) contact with patients, unless specifically authorized by Aurora in writing.
 - d. If Aurora makes Vendor scrubs available to a Vendor Representative, the Vendor Representative must wear those scrubs.

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- E. Vendor Access to Inventories / Storage Areas. Vendor Representatives are not allowed to access product inventories or other storage areas unless specifically approved in advance by ASL. In the circumstance permitted above, the Vendor Representative(s) must be accompanied by, or acting at the specific direction of, an Aurora employee at all times. All Vendors and Vendor Representatives must comply with all Aurora policies regarding consignment and consigned inventories.
- F. Promotional Activities, Materials and Displays.
1. Vendors may not display products or product information or otherwise distribute, post or leave any printed or handwritten material, advertisements, signs or invitations within any Aurora location, unless specifically permitted by ASL.
 2. Displays may be allowed adjacent to meeting rooms in connection with approved Aurora CME courses, approved research symposia or other educational activities if:
 - a. The primary Aurora contact for such activity approves the commercial display;
 - b. Placement is not a condition of providing support;
 - c. Vendors do not engage in any sales activity within the area that the education is occurring; and
 - d. The display is consistent with policies endorsed by the Accreditation Council for CME Standards for Commercial Support and other Aurora policies.
 3. Displays may be allowed in staff lounges for training if specifically approved by ASL.
 4. Vendor-sponsored raffles, lotteries or other contests in which items of value are provided to the winner(s) are prohibited.
- G. Conflicts of Interest and Vendor Business Conduct. Vendors and Vendor Representatives shall comply at all times with Aurora policies and procedures regarding conflicts of interest, compliance and business conduct. (See, [GIFTS AND BUSINESS COURTESIES](#) for example, [CONFLICTS OF INTEREST-CAREGIVERS](#) and [GIFTS AND BUSINESS COURTESIES](#))
- H. Confidentiality.
1. Any individual observing patient care or otherwise having access to confidential information must be subject to a confidentiality agreement and/or Business Associate Agreement, as required by the Aurora Legal Department.
 2. Vendor Representatives may not attend programs or meetings in which specific patients are discussed or when quality assurance or risk management issues are discussed.

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3. Vendor Representatives may not request or solicit: (a) internal reports, communications, agendas, minutes or other documents intended for internal distribution, (b) procedure or patient volumes; (c) competitive price or cost information; or (d) other confidential information unless specifically approved by ASL.

I. Introduction of New Products. Items that have not been previously purchased by Aurora may only be introduced pursuant to the processes and requirements of Aurora's New Item Approval Policy ([NEW ITEM APPROVAL](#)). Vendor and Vendor Representatives agree to comply with the terms of that policy.

J. Miscellaneous Restrictions.

1. Vendor Representatives may not open boxes or packaging from any product(s), including but not limited to Vendor products, unless specifically requested by an Aurora employee or physician.

2. Vendor Representatives may not utilize Aurora supplies or equipment, unless specifically requested by an Aurora employee or physician.

K. Site-Specific Restrictions. If and to the extent individual Aurora entities or facilities impose additional or more restrictive requirements on Vendors and Vendor Representatives, Vendors and Vendor Representatives must comply with those requirements when conducting business with those entities or facilities.

V. VIOLATIONS AND ENFORCEMENT

A. All Vendors and Vendor Representatives are required to comply with the terms of this policy. Each Vendor is responsible to ensure that all of its Vendor Representatives are aware of, and comply with, this policy, and each Vendor shall be responsible for the conduct of its Vendor Representatives.

B. Aurora staff will monitor compliance with this policy and report any suspected violations of this policy to their supervisor and ASL, as appropriate.

C. ASL will investigate reported violations of this policy. Vendors and/or Vendor Representatives who violate this policy may be temporarily or permanently prohibited from visiting Aurora locations or conducting business with Aurora, as determined by ASL.

CROSS REFERENCES:

[PURCHASE ORDER](#)
[NEW ITEM APPROVAL](#)
[CONFLICTS OF INTEREST-CAREGIVERS](#)
[GIFTS AND BUSINESS COURTESIES](#)

REFERENCES:

None

PRIOR REVIEW / REVISION DATES:

N/A