

Sanford Health's Industry Representative Management Program

Purpose

To establish consistent guidelines for the management of Industry Representatives (IRs) within Sanford Health's facilities. Patient care and safety is paramount to Sanford Health's mission and values. As a result, the Compliance and Supply Chain Departments are providing a set of guidelines to create safer standards of care within our facilities.

Scope

This program applies to all IRs who provide products and / or services, compensated or not, within Sanford Health's healthcare facilities.

Definitions

1. Industry Representatives

An Industry Representative includes anyone doing business in a Sanford Health facility who is not employed or privileged by Sanford Health or designee. This definition covers a wide range of individuals, including, but not limited to, individuals who provide technical assistance, delivery, distribution, promotion, sales, maintenance and/or training/instruction for supplies, devices, and equipment, sells any items or services, or delivers drugs or devices to health care practitioners, physicians, laboratories, patients, etc. (e.g., pharmaceutical representatives, medical device sales representatives, service technicians, delivery/facilities management personnel, consultants, distributor representatives, durable medical equipment, sales representative, etc.). In certain scenarios, this may also include students, teachers, researchers, volunteers as well as clergy and other support service individuals.

2. SEC3URE

A software Industry Representative Management System, used by Sanford Health to assist in the management of IRs compliance with such means as credentialing, communication, badging, reporting, and policy acknowledgement.

Representative Responsibilities

1. Create and maintain a SEC3URE account. Sanford Health, in conjunction with SEC3URE, will categorize each IR based upon the duties and location access within the Sanford Health facility.
2. Maintain compliance, based upon categorization, to required credentials, immunizations, education, policy acknowledgment, and other requests as required by Sanford Health and facilitated via SEC3URE. This includes updating expiring or expired credentials.
3. Immediately update SEC3URE account with any changes regarding employment, including changes in duties and / or clinic areas.
4. Sign in and out of the SEC3URE, via kiosk or mobile app, upon each visit.

5. All Representatives will follow the policies and procedures in this document as well as any other relevant policies and procedures implemented by Sanford Health.

Vendor Certification / Credentialing

Credential requirements are chosen by Sanford Health based on the categorization of the IR. All IRs are required to submit and comply with the Sanford Health required credentials noted in their SEC3URE account. This includes completing any required education and / or policy acknowledgment.

Material for credentialing should be submitted in a timely fashion to ensure compliance a minimum of four (4) business days prior to the initial facility visit. Expedite services may be available with SEC3URE. Medical and religious exemption requests may be considered by Sanford Health for immunization credentials. Exemption requests should be sent to SEC3URE who will then forward to Sanford Health for consideration.

Sanford Health credentials may include, but are not limited to:

1. Education;
2. Immunizations; and
3. Policy Acknowledgment.

Change to Required Credentials

Sanford Health may distribute additional policies, education and / or change credentialing requirements at any time. Representatives are responsible to monitor their compliance before each facility visit.

Vendor Access

1. Scheduled Meetings

Sanford Health requires IRs to have a scheduled appointment to gain access to the facility. Furthermore, cold calls, loitering in common areas, or badgering associates is not allowed by any IR.

2. Checking In and Out

IRs must sign-in and sign-out with every facility visit. Methods allowed for Representatives to check in or out of may include:

- a. Facility kiosk; and
- b. Via app on mobile device.

Access is either approved or denied upon check-in at the facility. If approved, a badge will either print, be given, or be sent as a wireless option on the SEC3URE mobile app. If

denied, the result and reasons for denial are documented within SEC3URE and notification will be sent to Sanford Health. Further action related to access will be determined by Sanford Health.

An IRs compliance to Sanford Health's credentialing requirements is normally demonstrated by way of a badge that is worn on clothing or shown on a smart phone.

Fees

IRS doing business within a Sanford Health facility shall subscribe to the SEC3URE system for registration. Depending upon the IR categorization, the IR may or may not be required to pay an annual subscription fee for credentialing management. All fees associated with SEC3URE are the responsibility of the IR.

Conduct While at Sanford Health Facilities

Sanford Health expects all IRs to review and adhere to Sanford Health's Vendor Code of Conduct. Specifically, any actual or perceived conflicts of interest must be reported to the Sanford Health Compliance Department. Specific departments within Sanford Health may have additional guidelines for IRs to abide.

The following are prohibited by IRs:

1. Entering patient care area including procedural areas, ER, OR, care units, outpatient clinics, waiting rooms, pharmacy dispensing areas without proper authorization;
2. Displaying company advertisements at Sanford Health facilities or leaving promotional materials unless requested by staff;
3. Making unauthorized visits or loitering;
4. Introducing new products without approval from the appropriate Value Analysis Team;
5. Discussing patient or business proprietary information outside of Sanford Health;
6. Entering inventory supply rooms without proper escort;
7. Accessing lounges locker rooms / meeting areas / without department managers approval;
8. Attending meetings with patient specific information, quality assurance activities, or risk management issues;
9. Providing direct patient care or attempt to assist in medical decision making;
10. Operating equipment on a patient without explicit written consent from clinic staff;
11. Accessing secure information without expressed permission and oversight from department manager;
12. Providing personal gifts, cash, or incentive programs to Sanford Health employees;

13. Wearing of Sanford Health scrubs off campus.

Compliance

Failure to comply with Sanford Health's Vendor Management Program may result in disciplinary action, up to and including, losing the privilege of continuing business activities with Sanford Health

Any reported violations by an IR will be investigated. If an IR is found to be in violation of the Vendor Management Program, Sanford Health policy, or any requirements placed upon the IR by Sanford Health, the following steps will be taken:

1. For 1st offense—Verbal warning;
2. For 2nd offense—Letter sent to vendor's direct supervisor and 30 day suspension from conducting business activities with Sanford Health;
3. For 3rd offense—Loss of business privileges with Sanford Health as determined by the Compliance and Supply Chain Departments, with the possibility of permanent suspension.
4. Sanford reserves the right to immediately ban IRs for grievous infractions

Sanford Health reserves the right to deny credentialing to any IR and restrict access to Sanford Health facilities at any time.

Sanford Health reserves the right to limit IR access, in situations and times it deems appropriate, only to IRs who Sanford Health deems essential to health care operations and / or may establish policies and procedures to limit IR access to certain hospital and clinic areas and locations.