Texas Health Resources

Business Ethics and Compliance Program

Key Information for Vendors

Texas Health is committed to the highest ethical and legal business practices consistent with health care laws and regulations and maintains a system-wide Business Ethics and Compliance Program. The Program focuses on the detection and prevention of violations of federal, state and local laws and fosters an environment of non-retaliation for questions or concerns raised in good faith.

Texas Health Mission: To improve the health of the people in the communities we serve. **Texas Health Vision:** Partnering with you for a lifetime of health and well-being.

Texas Health Values:

Respect: We are committed to respecting the dignity of all persons and to fostering a system culture characterized by teamwork, diversity and empowerment.

Integrity: In building present and future partnerships, we are committed to and accountable for conducting our system and personal lives with integrity. We seek to build relationships based on loyalty, fairness, truthfulness and trustworthiness.

Compassion: We are committed to providing health care with a sensitivity to the whole person, reflective of God's compassion and love, with particular concern for the poor.

Excellence: We are committed to excellence by continuously improving the quality of our service delivery. This is done through the commitment to education and responsible stewardship of assets and resources.

Our Texas Health Promisesm: Individuals Caring for Individuals, Together[®].

Compliance Hotline: Texas Health maintains a toll-free hotline number (1-800-381-4728) where employees, medical staff, vendors and others can ask questions or raise concerns without fear of retribution. Callers may remain anonymous, if desired.

Vendor Clearance Process: Texas Health uses an online process to verify vendor credentials such as training certifications, immunization records, proof of insurance and policy agreements. All vendors interacting with patients are required to register via the online process. Texas Health does not employ, contract with or do business with any person or entity ineligible to participate in government health care programs. Texas Health routinely reviews the List of Excluded Individuals/Entities and the Excluded Parties List System to identify ineligible individuals or entities. **Vendors must immediately notify Texas Health if the company or its employees become excluded parties.**

Texas Health's Code of Business Ethics (Code): Contractors and agents are expected to be familiar with and follow the Code. A copy of the Code and other information is available at: <u>www.TexasHealth.org/VendorCompliance</u>



Federal and State False Claims Act: Texas Health is committed to compliance with Federal and State False Claims Acts and the prevention and detection of fraud, waste and abuse.

Non-Retaliation: No person, who in good faith, reports suspected misconduct involving the Code, Texas Health policies, laws or regulations, patient safety or quality of care issues will suffer retaliation. Texas Health has a strict non-retaliation policy.

Business Courtesies & Gifts: Employees may not solicit, accept or offer substantial business gifts or courtesies from or to any vendor or potential vendor with whom Texas Health does business or seeks to do business. Business gifts/courtesies must be infrequent, low in value (normally less than \$100) and must not be perceived as influencing an employee's fairness. Cash

equivalents such as checks, gift certificates/cards or any other item redeemable at a store for products or cash are prohibited in any amount. In addition, vendors must not pay for employee travel expenses to attend focus group meetings, educational conferences or other events.

Solicitation: Vendors and others may not solicit employees or distribute brochures, coupons or other material on Texas Health property.

Donations, Grants & Other Charitable Gifts: Vendor donations, grants or contributions should be directed to the appropriate Texas Health Foundation. Transactions should not involve department level personnel or vendor sales or marketing representatives. Charitable donations, grants and contributions must be philanthropic in nature with no expectation of anything in return.

Relationships with Suppliers and Representatives: All purchasing relationships must be independent, fair and free from conflicts of interest. No vendor or vendor representative will be given special favors based upon a family relationship to a Texas Health officer, employee, board member or medical staff member. All purchase details must be fully stated in a written agreement including information necessary for accurate accounting including any rebates or discounts.

Product Samples, Demonstration Equipment, and Acceptance of Vendor Products: Texas Health standards must be followed for arrangements involving samples, demonstration equipment or delivery of vendor products at no charge. Texas Health will not accept items at reduced prices in return for future purchases of the same or different product or service.

Vendor Endorsements, Demonstrations and Education: Texas Health does not endorse or promote a specific vendor, products or services to patients, employees or business associates. Vendors should not use the Texas Health, hospital name or logo in press releases, advertising materials, brochures or articles without Texas Health's prior written approval. Guidelines for on-site demonstrations and participation in patient, community or physician education must be strictly followed. Texas Health employees should not be asked to write articles or provide quotes for use in vendor materials.