Business Ethics and Compliance Program

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 (LEIE) and the Excluded Parties List System (EPLS) to identify ineligible individuals or entities.

Vendors must immediately notify Texas Health if the company or its employees become excluded parties.

Premier's Code of Conduct

Texas Health participates in group purchasing services with Premier, Inc. Texas Health abides by Premier's Group Purchasing Code of Conduct. The Code and additional commitments are located at

Premierinc.com/about/mission/ethics-compliance/index.jsp

Texas Health's Vendor Compliance website

Vendors should review the entire Code of Business Ethics and other information posted to the Texas Health Vendor Compliance website located at

TexasHealth.org/VendorCompliance.

Business Ethics and Compliance Program
CONTACT INFORMATION

SUPPLY CHAIN MANAGEMENT 628-236-7517

TEXAS HEALTH COMPLIANCE HOTLINE 1-800-381-4728

VENDOR COMPLIANCE WEBSITE TexasHealth.org/VendorCompliance

Texas Health Resources

Texas Health Mission

To improve the health of the people in the communities we serve.

Texas Health Vision

Texas Health Resources, a faith-based organization joining with physicians, will be the health care system of choice.

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.

Texas Health Promise

Healing Hands. Caring Hearts.SM



Healing Hands, Caring Hearts,™

Doctors on the medical staff practice independently and are not employees or agents of the hospital except for resident doctors in the hospital's graduate medical education program.

1-877-THR-WELL (1-877-847-9355)

TexasHealth.org



Business Ethics and Compliance Program





Texas Health is committed to the highest ethical and legal business practices consistent with health care laws and regulations. Pursuant to this commitment, Texas Health maintains a system-wide Business Ethics and Compliance Program (Program). The Program includes policies, procedures and guidelines designed to assist employees, contractors and agents in addressing various business scenarios that may arise. 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.

Compliance hotline 1-800-381-4728

Texas Health maintains a toll-free phone number as part of an internal communications process where employees, medical staff, vendors and others can ask questions or raise concerns without fear of retribution. Callers may remain anonymous, if desired. The hotline is available to vendors who may have a business ethics question or concern.

Texas Health Code of Business Ethics

Texas Health's Code of Business Ethics (Code) is an important part of the Program and provides employees, contractors and agents with practical guidelines for addressing common questions that may arise in day-to-day business activities. Contractors and agents are expected to be familiar with and follow the Code. Call the Texas Health Compliance Hotline with any questions you may have. A copy of the Code and other information is at TexasHealth.org/VendorCompliance.

FEDERAL AND STATE FALSE CLAIMS ACTS

Texas Health is committed to compliance with Federal and State False Claims Acts and the prevention and detection of fraud, waste and abuse. Claims and cost reports must be based upon true and accurate information. You must adhere to these standards.

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 AND 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 and 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, gift 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. Vendors must refrain from offering business courtesies and gifts that do not conform to Texas Health's standards.

SOLICITATION

Vendors and others may not solicit employees or distribute brochures, coupons or other material on Texas Health property. This policy prevents disruption to operations, interference with patient care and inconvenience to patients, customers, visitors and employees. Please make an appointment prior to visiting any Texas Health department or employee.

DONATIONS, GRANTS AND 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. All arrangements must be in writing with full disclosure of details, prices, terms and conditions.

REQUEST FOR QUOTE PROCESS

Sufficient research will be conducted to provide confidence that the desired product or service meets Texas Health quality requirements at a competitive and fair price. If a site visit is necessary to fully evaluate the product or service, the site visit requirement should be included in the formal request for quote along with details regarding payment of travel expenses, if any.

VENDOR ENDORSEMENTS AND DEMONSTRATIONS

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 or hospital name or logo in press releases. advertising materials, brochures or articles without Texas Health's prior written approval. Texas Health employees should not be asked to write articles or provide quotes for use in vendor promotional materials. Guidelines for on-site demonstrations must be strictly followed.

EDUCATIONAL SESSIONS AND SPONSORSHIPS

Vendors or others may offer to sponsor education sessions for patients, the community, employees or physicians. Specific guidelines apply, so contact Texas Health for more information.