

Providence Health & Services

and its affiliated organizations (collectively referred to as "Providence") are committed to the highest ethical and legal business practices, consistent with state and federal laws and regulations. Along with our Mission and core values, the Providence Integrity and Compliance Program provides a road map to help us meet our legal, ethical and professional obligations.

The Compliance Program focuses on the detection and prevention of violations of federal and state laws, and fosters an environment of non-retaliation for questions or concerns raised in good faith.

Integrity and Compliance Program In Partnership with Our Vendors

Integrity Line: 888-294-8455

Integrity Online

This guide provides summary information about the Providence policies with which all vendors must comply to maintain a continuing Providence partnership. A list of applicable policies may be found via the Integrity & Compliance home page (<http://www2.providence.org/phs/integrity/Pages/default.aspx>).

If you have questions about this or related information, please contact Supply Chain Management, or, any of the other resources listed on the back of this guide or for additional resources reference the Providence Code of Conduct (<http://providence.org/CodeOfConduct>) or Swedish Code of Conduct (www.swedish.org/codeofconduct).

Vendor Clearance

Providence uses an online process to verify vendor credentials such as training certifications, immunization records, proof of insurance and policy agreements. All vendors interacting with Providence or its patients are required to register through the online system.

Providence does not employ, contract or do business with any person or entity ineligible to participate in government health care programs. Providence routinely reviews the System for Award Management (SAM) to identify ineligible individuals or entities. All vendors must immediately notify Providence if the entity or its caregivers (employees) become excluded parties.

As part of your credentialing process, please make sure you are familiar with our Health Care Industry Representatives (HCIR) In Patient Care Areas policy. To review, refer to policy on RepTrax or contact Supply Chain for a copy of the policy.

Noncompliance

Noncompliance with contract requirements, violation of Providence policy or disruptive behavior may result in Providence assuming no responsibility for products or product payment and/or vendor removal.

Federal and State False Claims Act

Providence is committed to: (1) compliance with federal and state false claims acts; (2) the prevention and detection of fraud, waste and abuse; and (3) submitting claims that contain true, complete and accurate information.

Non-retaliation

Individuals who report concerns related to fraud, waste, abuse are protected from retaliation under Providence policy and federal and state whistleblower laws.

Gifts and Entertainment

Providence caregivers are not permitted to solicit, offer, or accept business gifts or entertainment to or from any vendor or potential vendor. Vendors may not pay for caregiver travel expenses to attend education or other events except pursuant to a signed, written agreement between the parties. Vendors must refrain from offering gifts and entertainment that do not conform to Providence policies and standards.

Product/Service Endorsements

Providence does not permit the use of its name, trademarks or service marks or other images of any of its facilities for any commercial use without prior written approval. Written approval must be obtained in accordance with applicable Providence policies. Endorsements are prohibited regardless of whether compensation is received.

Solicitation

Vendors may not solicit patients, customers, visitors or caregivers, nor distribute brochures, coupons, samples or other material on Providence property. Policy prohibits disruption to operations, interference with patient care and inconvenience to patients, customers, visitors and caregivers. Vendors are required to make an appointment with a department or caregiver prior to visiting a Providence facility.

Vendor Exclusion

Vendors found to be in violation of state or federal law and/or Providence policy and standards may be removed promptly from the system and barred from conducting future business with Providence.

Patient Information and Security

Patient protected health information (PHI), personally identifiable information (PII) and other confidential information require special care. Consistent with HIPAA and other federal and state privacy laws, PHI may not be used or disclosed except for the following:

- For patient care and coordination purposes
- For payment or health care operations purposes
- For disclosures required by law
- For disclosures authorized by the patient
- For disclosures specifically permitted under Providence policy or Providence's Notice of Privacy Practices

Providence vendors have a responsibility to ensure they and their representatives comply with the following privacy and security guidelines: PHI should only be accessed, used or disclosed when there is a legitimate business need to do so and as authorized by your contract/service agreement with Providence; you should only access the minimum amount of PHI needed to perform a specific job; a patient's condition/PII/PHI should not be discussed in public areas; and PHI/PII should never be posted on social media sites. Providence is legally obligated to protect, remediate and report breaches of PHI and PII to the individual, state government and Department of Health and Human Services in certain circumstances. Breaches relating to Providence PHI/PII, must be reported immediately to the Business Associate Breach Reporting Hotline at 877-512-7119.

Reporting Process

Report any concern by contacting:

- The Supply Chain Management Office
- The local or regional integrity and compliance office
- The Providence Integrity Line at 888-294-8455

Providence expects vendors to promptly report actual or potential wrongdoing.

Contact Information

One Supply Chain Management (OSCM)
425-687-3860

Integrity Line / Integrity Online
888-294-8455 (toll free, 24/7)

[https://www.compliance-helpline.com/
ProvidenceIntegrityLine.jsp](https://www.compliance-helpline.com/ProvidenceIntegrityLine.jsp)