

Healogics®

The power to heal

HEALOGICS, LLC. WOUND CARE CENTER® VENDOR CODE OF CONDUCT

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Section 1: Introduction

- 1.1 This Wound Care Center® Vendor Code of Conduct (“Code” or “Vendor Code of Conduct”) is applicable to all entities and their representative(s) conducting business or wishing to conduct business with Healogics, LLC. and its affiliated companies (“Healogics”) at Wound Care Centers® managed by Healogics (“Centers”). Members of Healogics’ Workforce¹ who interact with vendors in the Centers are expected to have knowledge of this Vendor Code of Conduct and to report any non-compliance with this Code.
- 1.2 Wound care medical supplies and products play an integral role in the successful treatment of and outcomes for the patients at Centers. Healogics strives to treat each vendor and representative of these product and service entities fairly and professionally. Hospital customers maintain control of actual product and technology selection for use in the Centers.
- 1.3 The Healogics’ Code of Conduct and Ethics requires all Healogics employees and agents to act with integrity, use prudent judgment and comply with all applicable laws in their interactions with vendors. Healogics has created this Vendor Code of Conduct to reinforce the guidelines and procedures for continued interactions between the product/supply vendors and Healogics Workforce members in Centers.
- 1.4 All vendors are expected to adhere to this Vendor Code of Conduct when conducting business at a Center and interacting with Center personnel.

¹ “Healogics Workforce” means any individual who is either a W-2 employee or independent contractor of Healogics.

Section 2: Vendor Visits to Centers

2.1: Vendors visiting Centers must:

- Schedule a visit with Program Director (PD) or Clinical Nurse Manager (CNM) in advance. Vendors may be turned away by the PD or CNM at their discretion.
- Conform to hospital policies at all times during visit.
- Identify themselves as a visiting vendor, have identification that is clearly visible on their person.
 - ✓ The PD or Clinical Coordinator (CC) shall verify the identity of the Vendor by viewing a valid driver's license or other government issued picture identification.
- Dress in appropriate business attire (scrubs are not permitted).
- Ensure all new electrical equipment is reviewed and approved by the hospital's clinical engineering/biomedical department before arrival at the Center.
- Ensure all wound care supplies or products are reviewed and approved by the hospital's materials management department before arrival to the Center.
- Be accompanied at all times in the Center by the PD or his/her designee.
- Provide information that conforms to the Medicare Local Coverage Determination (LCD) in place for the state or jurisdiction where the hospital is located. If the Medicare Administrative Contractor (MAC) or Fiscal Intermediary (FI) does not have a formal LCD in their state or jurisdiction then the manufacture's package insert or guidelines must be followed for appropriate use of the product or supply being used.
- Follow all instructions regarding infection control practices and fire safety.

2.2 Vendors visiting Centers may not:

- Enter patient rooms, unless: a) patient and physician/physician extender have provided verbal or written consent, b) the consent is documented as a note in the medical record and c) vendor is accompanied by the physician/physician extender.
- Access or attempt to access Healogics or hospital customer databases or reports printed from those databases.
- Access or attempt to access patient medical records.
- Be in the Center unaccompanied.
- Assist or perform any care, treatment or service to the patient that involves physical contact.
- Distribute reimbursement, billing or coding information to Center staff or physicians while in the Center. (Reimbursement questions from the Healogics staff should be directed to their area's Revenue Cycle Manager).
- Take photographs, unless allowed by hospital policy and patient's consent is documented in the medical record.
- Meet with the center's medical director and/or panel physicians without the consent of the PD.
- Engage in unauthorized selling or lobbying for a product. Such behavior shall be grounds for removal from the Center.
- Distribute marketing materials at the Center without the consent of the Center's PD.
- Promote any off-label use of their products during their site visits, in email communications or during phone conversations with Center staff or Providers.
 - ✓ Note that while vendors may not promote off-label use of products, providers, in the exercise of their medical judgment, may elect to order products for off-label use.

2.3 In all situations the vendor and other product/service company representatives must conduct themselves in an ethical manner and not engage in any unlawful or unacceptable behavior.

Section 3: Educational Activities

3.1 In-service Training: Product or Pharmaceutical vendor representatives who wish to conduct educational events on-site at Centers must:

1. Obtain CNM or PD approval prior to conducting the event
2. Be a hospital approved vendor.
3. Be qualified clinical product representatives of the vendor or manufacturer.
4. Comply with all hospital and Healogics policies relating to on-site in-service training sessions and comply with such policies.
5. Maintain patient confidentiality at all times (in-service training should not be conducted in presence of patients or use patient-identifiable information, to preserve their privacy).
6. Vendors may provide assistance with organizational activities such as: educational content, sponsorship, food, venue, invitations, generating attendance with approval from Healogics Marketing and Compliance Departments. Any assistance must be in accordance with the AdvaMed Code of Ethics, which is incorporated herein by reference.
7. Vendor Presentation materials must:
 - a. Be educational
 - b. Present product as one of the available modalities
 - c. Not represent or refer to Healogics and vendor as partners
 - d. Not include the Healogics logo
8. Vendor branded sales and marketing materials may not be left by vendors in the public areas (such as waiting rooms) in the Center. Vendors may provide materials to the Center or Providers for educational purposes.

3.2 Corporate Sponsored Training Offering Continuing Medical Education (“CME”) and Continuing Education Units (“CEU”): Healogics offers accredited training for providers, nurses and HBO technicians, which may take place in person or virtually.

1. During the educational training, Vendors may:
 - Work directly with the Healogics Learning & Development Department to obtain approval to attend.
 - Provide free samples for educational purposes
 - Set up their product for use
 - Attend and observe the course (not speak, assist or train)
 - Discuss any commentaries or discrepancies in the training they observed with the Vice President of Learning & Development.

There may be instances in which vendors may have opportunities to exhibit and/or speak at events. Such opportunities will be made available in accordance with the AdvaMed Code of Ethics.

3.3 Vendor Sponsored CME and CEU Events in the Field: Vendors may work with PDs to develop vendor-sponsored events that provide CME and CEUs, approved through the Accreditation Council for Continuing Medical Education or American Nurses Credentialing Center respectively. Provide all educational materials used in presentation to CNM and PD for approval via e-mail at least 10 days prior to event

Section 4: Free Samples/Loaner Products

4.1 Vendors may leave free samples of products in Centers for providers and/or Center staff to evaluate the product, provided this is allowed under Hospital policy. The number of samples should be limited to a reasonable number necessary for the Center to evaluate the product. Healogics is required to follow hospital policy when using free samples of product in Centers.

4.2 Vendors may loan medical devices to Centers for the purpose of evaluating the device, if allowed under Hospital policy. Vendors must comply with the AdvaMed guidelines and all applicable Hospital policies.

4.3 Vendors may not provide inappropriate incentives for Centers to induce providers or Healogics Workforce members to use Vendor products or services.

Section 5: Insurance Verification Programs

5.1 Initial Approval & Agreement

5.1.1 Vendors with an insurance verification program must seek review and approval from Healogics Compliance and IT/Security Departments prior to presenting the program to the Centers.

5.1.2 The following information must be provided to Healogics Compliance Department (compliance@healogics.com) for review:

- Flow of Protected Health Information (“PHI”)
- Details of how PHI will be secured at every point in the information flow and how the PHI is stored and destroyed, including timeframes.
- Forms and PHI content that will be required from the Center’s medical record
- Timeline of the insurance verification process
- Name of third-party vendor, receiving and conducting the insurance verification (if applicable)
- Name and contact information for Vendor’s compliance contact.
- Confirmation of whether PHI will be used for marketing purposes
- Sample of any reports provided by third party vendors
- Any additional information the Compliance Department requests

5.1.3 The following information must be provided to Healogics IT/Security Department (support@healogics.com) for review:

- Vendor portal, if applicable
- Any additional information the IT/Security Department requests

5.1.4 Upon approval of the vendor’s insurance verification program process, the vendor’s corporate office is required to sign the following agreements with Healogics:

- Insurance Verification Agreement
- Vendor Certification Form
- Business Associate Subcontractor Agreement

5.1.5 Approval from hospital partner must be obtained in writing granting permission for Healogics to share PHI with the vendor for prior authorization purposes.

- Form can be obtained on the Healogics HUB (Center Level Vendor Agreement-Exhibit C-Authorization to Provide Services) or by contacting the Compliance Department (Compliance@healogics.com)

5.2 Under no circumstances will it ever be appropriate for Vendor, or its subcontractor, to disclose patient PHI to vendor representatives. Violation of this stipulation may result in a HIPAA breach and notice of such to the Office of Civil Rights, the hospital's Privacy Officer and the patient. In the event of an accidental breach of patient PHI, the Healogics Compliance Department must be notified immediately.

Section 6: Vendor Program Approval Process

6.1 The hospital partner has full discretion over the approval of new vendor programs, and vendors must adhere to the policies and procedures established by the hospital partner.

Section 7: Penalties

7.1 It is the responsibility of each member of Healogics Workforce to report any violations of the Vendor Code of Conduct to the Healogics Compliance Department (compliance@healogics.com). Each report will be fully investigated and corrective action will be taken where appropriate. Vendors and Healogics corporate offices will work together to determine appropriate corrective action for vendor representatives who do not follow these guidelines. Possible corrective actions are listed below:

1. Healogics Vendor Code of Conduct Re-education
2. Temporary suspension from visiting Centers
3. Prohibition of access to the Centers

Section 8: Questions

8.1 For questions about this Code, please contact Healogics Compliance at compliance@healogics.com