# INFORMATION FOR VENDORS

As a health care provider that receives federal funding, Lake Superior Community Health Center (LSCHC) is committed to ensuring that we provide care in an ethical manner and that we uphold all state and federal laws and regulations that guide our work. We are also committed to our values of excellence in clinical care, community-oriented services, collaboration, accessible health care, accountability and being intentionally welcoming.

It is important to us that employees, volunteers and vendors uphold these values and follow laws and regulations as well as LSCHC's policies and procedures that have been established to create a culture of compliance. All vendors doing business with LSCHC are expected to uphold these values and to abide by applicable laws and regulations, as well as the policies included here on our website.

#### Federal, state or other exclusions.

Any vendor doing business with LSCHC must warrant that, to the best of its knowledge after inquiry, neither it nor any of its employees have ever (a) been convicted of, or indicted for, a crime related to health care, or listed by a federal agency as debarred, excluded, or otherwise ineligible for participation in a federally-funded health care program (or notified of such action); or (b) otherwise engaged in conduct for which a person or entity can be so convicted, indicted or listed. By doing business with LSCHC, the vendor agrees to notify LSCHC immediately in the event that it becomes aware of any such conviction, indictment, listing or notification that arises when the vendor is doing business with LSCHC or the three (3) year period after the vendor relationship ends. Upon receipt of such notice by LSCHC or if LSCHC otherwise becomes aware of such conviction, indictment, listing or notification, LSCHC may cease doing business with the vendor immediately and may terminate any contract with the vendor immediately, despite any language in any contract between the parties to the contrary. Vendors doing business with LSCHC agree to indemnify LSCHC and hold it harmless from all liabilities, damages, penalties, and losses (including, without limitation, reasonable attorneys' fees) arising from the vendor's misrepresentation of the foregoing information or failure to provide notification described in this section.

## Code of Conduct

LSCHC has in place a Code of Conduct ("Code"), the goal of which is to ensure that all federal, state, local laws and regulations are followed. It includes a commitment to uphold a high standard of ethical and legal business practices, and to prevent misconduct. Vendors may call the LSCHC Compliance Department at 218-336-3583 to request a copy of the code of conduct, or may access it <a href="here">here</a>. All vendors doing business with LSCHC agree to abide by the code of conduct. All vendors are held accountable for their actions, and LSCHC will investigate any potential ethical or compliance concerns. If any such concerns are found to be valid, LSCHC will fully cooperate with any local authorities and/or government investigation into alleged violations involving the vendor.

## Fraud, Waste and Abuse.

Please click <u>here</u> to read LSCHC's policy regarding preventing, detecting and reporting fraud, waste and abuse.

#### Vendors in direct patient care areas

Vendors who may be working in patient care areas and have exposure to patients (other than incidental exposure) may be required to meet LSCHC's policies regarding communicable diseases, e.g. receive a mantoux test to demonstrate that they are free from tuberculosis. If this is required, you will be notified.

# Contracted services

If LSCHC contracts with a vendor for the services of a person employed by or under contract with that vendor ("Contracted Employee"), and if the Contracted Employee will have access to protected health information (PHI) about LSCHC patients (as PHI is defined under the Health Insurance Portability and Accountability Act and its implementing regulations), the Contracted Employee will be required to complete LSCHC"s HIPAA training or, you as the vendor will be required to attest that you have provided the Contracted Employee with HIPAA training that is at least as rigorous as the training provided by LSCHC. If there is any question about the content of a vendor's training, LSCHC may require the Contracted Employee to complete LSCHC's training.

All LSCHC vendors are expected to complete Medicare general compliance and fraud, waste, and abuse training. Training can be completed on the Medicare Learning Network website: <a href="https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/WebBasedTraining.html">https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/WebBasedTraining.html</a>

