



Community Memorial Health System is committed to the highest ethical and legal business practices consistent with healthcare laws and regulations. Pursuant to this commitment, Community Memorial Health System maintains system-wide business ethics and compliance programs including the Vendor Management Program. The Program includes policies, procedures and guidelines designed to assist vendors, contractors, agents and employees, 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 for questions or concerns raised in good faith.

Community Memorial Health System is committed to the care and improvement of human life. In recognition of this commitment, we strive to deliver high quality, cost-effective healthcare in the communities that we serve.

We recognize and affirm the unique and intrinsic worth of each individual. We treat all those we serve with compassion and kindness, utilizing all of the skills and resources available to us.

We act with absolute honesty, integrity and fairness in the way we conduct our business and the way we live our lives.

### Mission

To heal, comfort and promote health for the communities we serve.

### Values

Integrity, Service, Excellence, Caring and Transparency

### Vision

To be the regional integrated health system of choice for patients, physicians, payers, and employees.  
To be an indispensable community treasure.

## Vendor Management Program

805/652-5072

[cmhshealth.org/vendor](http://cmhshealth.org/vendor)



## Community Memorial Health System

*Where Excellence Begins with Caring*

147 N. Brent St., Ventura, CA 93003

805/652-5011

[cmhshealth.org](http://cmhshealth.org)

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.

# Vendor Management Program



## Vendor Compliance Information

## Compliance Hotline 888/261-1773

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



## Community Memorial Health System

*Where Excellence Begins with Caring*



# Vendor Management Program

## Vendor Clearance Process

Community Memorial Health System (CMHS) requires all of our vendors and their representatives currently serving CMHS to complete an online registration and credentialing process, managed by Vendormate,® Inc., in order to continue their business relationship with CMHS.

Community Memorial Health System does not employ, contract with or do business with any person or entity ineligible to participate in government healthcare programs. Community Memorial Health System 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 Community Memorial Health System if the company or its employees become excluded parties.

Vendor compliance requires Vendormate® registration.

## Code of Conduct

Community Memorial Health System's Code of Conduct is an important part of the Vendor Management Program and provides vendors with practical guidelines for addressing common questions that may arise in day-to-day business activities.

Community Memorial Health System requires all vendors to be familiar with and abide by our Code of Conduct. The Code of Conduct is one component to be agreed upon as part of the Vendormate® registration process. Vendors may review the entire Code of Conduct at: [cmhshealth.org/vendor](https://cmhshealth.org/vendor).

## Federal & State False Claims Acts

Community Memorial Health System 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. Vendors must adhere to these standards.

## Non-Retaliation

No person who in good faith reports suspected misconduct involving the Code of Conduct, Community Memorial Health System policies, laws or regulations, patient safety or quality of products issues will suffer retaliation. Community Memorial Health System 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 vendors with whom Community Memorial Health System does business or seeks to do business. Business gifts and courtesies must be infrequent, low in value (normally less than \$50) and must not be perceived as influencing an employee's fairness. Cash equivalents such as checks or stocks 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 Community Memorial Health System's standards.

## Solicitation

Vendors and others may not solicit employees or distribute brochures, coupons or other material on Community Memorial Health System 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 Community Memorial Health System department or employee.

## Donations, Grants & Other Charitable Gifts

Vendor donations, grants or contributions should be directed to either Foundation in support of Community Memorial Health

System. Please visit [cmhshealth.org/giving](https://cmhshealth.org/giving). 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 Vendors & 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 Community Memorial Health System 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 & Acceptance of Vendor Products

Community Memorial Health System standards must be followed for arrangements involving samples, demonstration equipment or delivery of vendor products at no charge. Community Memorial Health System 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 Community Memorial Health System's 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 & Demonstrations

Community Memorial Health System does not endorse or promote a specific vendor, products or services to patients, employees or business associates. Vendors should not use the Community Memorial Health System or hospital name or logo in press releases, advertising materials, brochures or articles without Community Memorial Health System's prior written approval. Community Memorial Health System employees should not be asked to write articles or provide quotes for use in vendor promotional materials.

## Educational Sessions & Sponsorships

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