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	EFFECTIVE DATE: 10/20/03	NUMBER: 9167
	ORIGINATOR: Corporate Compliance Officer	
ORGANIZATIONAL POLICY Independent Contractors and Vendors	CONCURRENCE: Chair, Corporate Compliance Committee Divisional Director, Support Services	
	APPROVAL: CEO/PRESIDENT	

INTRODUCTION

It shall be the policy of Ellis Hospital to require all contractors, consultants and companies (collectively referred to as vendors) who provide items or services to the Hospital, to comply with all applicable laws and Hospital policies.

PURPOSE OF POLICY

To establish a procedure for monitoring vendors' compliance with all applicable laws and Hospital policies.

SCOPE

This policy applies to all Ellis Hospital employees.

PROCEDURES

- A. Agreements for items or services from vendors must be in writing and clearly specify the compensation for items or services. It shall be the responsibility of the Hospital employee accountable for the agreement to monitor the vendors activity.
- B. Annually, the accounting Department will identify and report to the Corporate Compliance Officer vendors who do a minimum of \$25,000 worth of business with the Hospital.
- C. Any employee of the Hospital responsible for a vendor's activity at the Hospital, will be responsible for notifying this activity to the Corporate Compliance Officer if this activity is \$25,000 or more per year.
- D. The corporate Compliance Officer will provide all vendors who do \$25,000 or more per year in business with the Hospital a copy of the Hospital's Corporate Compliance Policy. Each vendor will be required to sign a statement to verify that they have received and will comply with the policy.

- E. Any Hospital employee who works with vendors or who has contact with their invoices are to be in compliance with the Corporate Compliance Policy and must report any irregularities to the corporate Compliance Officer.
- F. Vendors should bring any questions or concerns about Hospital practices or their own operations to the Corporate Compliance Officer.

EXHIBITS

REFERENCES

ORIGINAL IMPLEMENTATION DATE: 05/06/97

REVIEW DATE: 05/99, 01/03

REVIEWED: 01/01

REVISED: 10/03