VENDOR MANAGEMENT

Policy:
The Arc of Monroe County conducts its business in compliance with applicable federal, state and local laws and regulations, and adheres to the highest ethical standards.

Definitions:
Vendor: somebody the agency gets things from. They can be a single person or a company. They don’t work for The Arc. Some vendors have contracts with The Arc and some don’t.

Subject Vendor: a vendor that needs to get information on our compliance plan, the false claims acts, and HIPAA. To become a subject vendor, they need to:
- Provide a service or item that has to do with health care AND have a contract with us;
  OR
- Provide a service or item that has to do with health care; AND
- Get at least 2 payments from us from January to June or July to December in the same year; AND
- Get paid at least $3000 from January to June or July to December in the same year.

The following won’t ever be subject vendors:
- Vendors of office supplies, car parts, automobiles, printing, food, shipping services, floral supplies, manufacturing supplies, key cutting, and appliance purchase or repair
- Utility companies. This includes electric, gas, phone, cell phone, internet, cable, trash removal, water, etc.
- Architects or general contracting firms
- Professional organizations
- Insurance companies
- Benefit companies. Example: employee health care
- Investment companies
- Government agencies or offices
- Anyone else who provides something that doesn’t have to do with health care

Procedure:
Every July and January, the compliance officer will ask finance for a list of new vendors for the 6 months that came before. The compliance officer will also ask for a list of all checks the agency wrote for the same period. The compliance officer will look over the new vendors to see if any of them would be subject vendors. If so, he will send them information on our compliance plan, the false claims acts, and HIPAA. He’ll also tell them how to find all compliance and HIPAA policies. Lastly, he’ll tell them how they can report a compliance concern if they have one.

We check every vendor to make sure they can work with Medicaid. We do this whether they are a subject vendor or not. This is called an exclusion check. This will happen once a month. If a vendor is found to be excluded, they can’t keep working with us. We will also see if we have to
pay any money back to the government. Please read the exclusion check policy for more information.

**Effective date:**
2/08

**Revised:**
5/30/08
10/30/09
5/4/10
10/21/11
2/21/12
8/3/12
6/5/17