

April 1, 2012

**IMPORTANT LETTER FOR FACILITY ADMINISTRATOR**

Dear Administrator:

Scripps Health's Corporate Case Management and Corporate Compliance Departments continuously evaluates the ongoing relationships and interactions between the Case Management Department and providers in the community with whom we refer our patients. Scripps is committed to maintaining independence, objectivity and professionalism in the discharge planning process and will not be influenced by gifts, meals and other gestures of goodwill. Although gifts, meals and other gestures of goodwill towards Scripps staff may not be intended for such a purpose, they are prohibited by Scripps policy. We are asking for your cooperation and understanding with the following:

1. Vendor representatives from community providers are not permitted to directly round on the nursing units. Requests to conduct a needs assessment for a referral must be coordinated with the referring case manager via ECIN (AllScripts) so a mutually agreed upon time for the needs assessment can be arranged. Vendor representatives are welcome to check on their current patients or to follow-up on a referral they have accepted, but only after first checking in at the Case Management office. The check-in process will now include specifying the patient(s) the provider intends to visit, the reason for the visit, a copy of the actual ECIN referral sent by the case manager in order to obtain the required Scripps visitor ID Badge. Access granted to patient care areas at Scripps facilities is intended for the specified patient(s) and does not constitute access to other patients, other floors, etc...
2. Gifts, meals, snacks, goodies, gift cards, and any other items that could be considered personal benefits must not be presented to Scripps employees, since acceptance of any of these items is a violation of Scripps' policy.
3. Items such as pens, notepads, with a value of no more than \$5, may be left for use by the entire department.
4. Invitations to after-hours social events (e.g., happy hours, dinners, sporting events, etc.) must not be presented to Scripps employees and invitations to such events will not be posted on Scripps premises. Employees who socialize with vendors have been duly informed that they are in violation of Scripps' policy if they allow any vendor to pay for anything on a Scripps' employee's behalf, or on behalf of an employee's immediate family member.
5. Scripps will only be scheduling in-services that provide BRN Continuing Education credits for Case Management and/or Social Work staff. If you would like to schedule an educational in-service please contact the Case Management Manager with your proposed agenda, presentation notes, and handouts so the in-service can be evaluated to determine if it meets Scripps' criteria for educational opportunities. In-services will also be open to other departments at Scripps that may benefit from the information provided.
6. Scripps typically conducts two mandatory educational events annually that all hospital Case Managers in the Scripps system attend. Vendors will be notified in advance of these events and will have an opportunity to exhibit their services to the Case Managers. Vendors will be asked to pay a flat rate that will be set in advance for the table rental, which will be used to help off-set the cost of the rental venue.
7. Scripps will update the Medicare vendor list for Home Health, Skilled Nursing Facilities and Hospices Agencies on a periodic basis. New vendors will be added to the list on the next regularly scheduled update.

We appreciate your cooperation in sharing this information with your employees so together we can avoid the occurrence of any inappropriate interactions not permitted by Scripps policies. Additional information on Scripps expectations of vendors and vendor responsibilities can be found on Scripps vendor web-site at <http://www.scripps.org/vendor-information>.

Sincerely,



Mary E. Whitehead, Administrative Director  
Scripps Health System-wide Case Management



Jan Coughlin, Sr. Director  
Scripps Health Corporate Compliance & Privacy Officer

cc: All Scripps Health Case Managers