

**Dialysis Regulatory and Ancillary Policies & Procedures**  
**Policy: 3-14-02**  
**DaVita HealthCare Partners Inc.**

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

**TITLE:     VENDOR TRAINING FOR TEAMMATES**

---

**PURPOSE:** To provide guidelines regarding Vendor Educational Trainings for teammates.

**SCOPE:** Educational Trainings held at DaVita locations, hosted by a Vendor and intended for DaVita teammates. This does not include Educational Trainings at industry or professional conferences.

**DEFINITIONS:**

**Educational Training:** Training provided to impart or acquire general knowledge regarding kidney health and other disease education, and to advance the delivery of effective and high quality health care to patients.

**Vendor:** Persons or organizations that provide, or seek to provide, goods or services directly to DaVita patients, DaVita teammates or DaVita or one of its affiliated entities.

**POLICY:**

1. DaVita will not solicit or receive Educational Trainings from Vendors as a reward or inducement to purchase, lease, or refer any items or services which may be reimbursable by government health care programs.
2. Vendors may provide Educational Trainings to teammates, if the Educational Training is:
  - a. Approved of in advance by the DaVita Clinical Operations Team.
    - i. Approved Educational Training programs are on the VillageWeb<sup>1</sup>.
    - ii. To obtain approval for an Educational Training not listed, submit a *Vendor In-Service Training for DaVita Teammates Form*<sup>2</sup> to the Clinical Operations Team at least one month in advance of the planned Educational Training.
  - b. Held in a location conducive to an Educational Training.
    - i. Appropriate Venues

---

<sup>1</sup><http://villageweb.davita.com/index.cfm?act=doc1&DepartmentID=171&pageParentContentID=26131&bcp=26131>

<sup>2</sup><http://villageweb.davita.com/index.cfm?act=doc1&DepartmentID=171&pageParentContentID=52999&bcp=52999>  
Property of DaVita HealthCare Partners Inc. Confidential and Copyrighted ©2006-2013  
Origination Date: October 2006  
Revision Date: November 2008, March 2010, September 2010, March 2011, December 2011, May 2013, September 2013

## Dialysis Regulatory and Ancillary Policies & Procedures

### Policy: 3-14-02

#### DaVita HealthCare Partners Inc.

1. Conference or Meeting Room at a DaVita facility
2. Banquet Hall
- ii. Inappropriate Venues
  1. Dialysis treatment floor or other patient care area
  2. Restaurant or bar
3. Teammates may accept a modest meal in conjunction with an Educational Training, if the meal is:
  - a. Incidental to the Educational Training;
  - b. Only provided to Teammates who participate in the Educational Training;
  - c. Eaten in conjunction with the Educational Training; and
  - d. Charged directly to the Vendor.
4. Vendors who provide Educational Training at a DaVita facility must:
  - a. Sign the Facility Visitor Log in accordance with the *Facility Visitation* policy;
  - b. Be accompanied by a Teammate at all times;
  - c. Not access the treatment floor (except if necessary to access a conference room) or protected health information maintained by DaVita; and
  - d. Immediately leave the facility, if requested to do so by the staff.

*Teammates are expected to report possible violations of this policy and procedure. You may make your report to an appropriate DaVita manager or to the Corporate Compliance Hotline (888-458-5848 or [DaVitaComplianceHotline.com](mailto:DaVitaComplianceHotline.com)). DaVita has a Non-Retaliation policy and will not tolerate any form of retaliation against anyone who files a Compliance report in good faith. Reports can be made anonymously or you may request confidentiality. Questions regarding this policy should be directed to the QUESTionLine at 855-687-9645 or [QUESTionLine@davita.com](mailto:QUESTionLine@davita.com).*

**Dialysis Regulatory and Ancillary Policies & Procedures**  
**Policy: 3-14-02**  
**DaVita HealthCare Partners Inc.**