TITLE: VENDOR TRAINING FOR TEAMMATES

PURPOSE: To provide guidelines for in-services and other educational training (Educational Training) conducted by Vendors, including VSPs, in a manner that is consistent with applicable laws.

DEFINITIONS:

Educational Trainings: Training provided to teammates to advance the delivery of effective and high quality health care to patients. Educational Training serves a genuine educational function for DaVita teammates. Educational Training is purely educational, not promotional.

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.

Village Service Partner (VSP): A Vendor who has a written contract with DaVita and/or has otherwise been approved to access DaVita facilities, teammates and/or patients in accordance with applicable policy and procedure.

POLICY:

1. Only VSPs will be permitted to conduct Educational Trainings with teammates, unless otherwise approved by Clinical Operations or permitted by this policy.

2. All Educational Trainings and materials will be reviewed and approved of by the DaVita Clinical Operations team or other appropriate department, prior to scheduling or presenting to DaVita teammates.

3. Teammates may accept an occasional, modest meal in conjunction with an Educational Training.

4. Educational Trainings will be held in locations conducive to an Educational Training.

5. All approved educational trainings must be conducted in accordance with the Clinical In-Service Program policy (available on the Clinical P&P website in Vol.1, Peritoneal Dialysis and Home Hemodialysis manuals on the VillageWeb).
PROCEDURE:

A. VSP Trainings: Educational Training for DaVita Teammates – Pre-Approved:

1. Teammate will:
   a. Go to the Clinical Operations homepage of the DaVita VillageWeb;
   b. Click on Approved Village Service Partner In-Service Training Lists; and
   c. If the VSP name is listed, click on the VSP name and confirm that the approved in-service training is listed on the list of approved in-services for that VSP.

2. If the Educational Training is on the list of approved in-services, then the Facility Administrator (FA) or designee:
   a. May work directly with the VSP to schedule the training;
   b. Will oversee the educational training;
   c. Will update the Vendor on DaVita’s policies regarding appropriate interactions; and
   d. Will follow the procedures outlined in Procedure C of this policy for On-Site in-services.

B. VSP and Vendor Trainings: Educational Training for DaVita Teammates – Not Approved:

1. If the Educational Training is not on the list of approved in-services, the teammate will complete the Vendor In-Service Training for DaVita Teammates form (available on the Compliance (Team Quest) webpage on the VillageWeb) and fax the form to the Clinical Operations team at 866-613-0587 for review.

   Note: Teammates should not schedule a Vendor Educational Training until they have received approval from Clinical Operations.

2. The Clinical Operations Department will review the request and provide written approval or denial.
   a. If the Clinical Operations Department approves the request, the teammate will work directly with the VSP or Vendor to schedule the Educational Training, as outlined in Procedure A. 2 above.
b. If the Clinical Operations Department denies the request, the VSP or Vendor will not be permitted to perform the Educational Training.

Note: Requests received by the first of the month will be reviewed by the end of the month.

3. The FA must maintain a copy of the Vendor In-Service Training for DaVita Teammates form and the response from the Clinical Operations department.

C. VSP In-Service Training at the Facility:

1. Prior to a VSP conducting an in-service training at a DaVita dialysis facility, the teammate coordinating the visit:
   a. Obtains approval from the FA or designee;
      i. Schedules the in-service at least one week in advance; the VSP is required to provide at least one week advance notice when scheduling an in-service training.
   b. Confirms the proposed educational in-service and associated materials have prior approval by DaVita’s Clinical Operations department in accordance with DaVita’s Vendor Training for Teammates policy; and
   c. Ensures the VSP signs the Visitor Log upon arrival at the facility.

2. A facility teammate must accompany the VSP at all times while in the facility.

3. The in-service training must take place in a meeting area (e.g. conference room, office)
   a. The VSP should not have access to the patients or the patient treatment area before, during or after any training.

4. Teammates may terminate or cancel an in-service training at any time due to:
   a. Inappropriate messaging or behavior by the VSP; or
   b. Change in workload or facility process that requires the in-service to be cancelled or postponed.

5. During an in-service training, the VSP and/or teammates should not engage in conversations outside of the approved materials and/or messaging, and teammates are to avoid any sharing of proprietary information with VSPs.
D. Hospice/End-of-Life: Vendor Educational Training for DaVita Teammates:

1. If the Educational Training is related to Hospice or End-of-Life planning, the teammate organizing the training will:
   a. Obtain copies of the Vendors materials; and
   b. Review the materials with the Divisional Lead Social Worker.

2. The Divisional Lead Social Worker may approve the training, if it is:
   a. Not promotional;
   b. Educational in nature; and
   c. Conducted in an appropriate venue for Educational Training (see Procedure I).

3. If the Divisional Lead Social Worker does not confirm that the above criteria have been met, the Vendor may not provide the Educational Training, unless the teammate obtains approval in accordance with Procedure B above.

   Note: Teammates should not schedule an Educational Training until they have received approval from their Divisional Lead Social Worker.

4. If the Divisional Lead Social Worker approves the Educational Training, the Divisional Lead Social Worker will:
   a. Oversee the Educational Training;
   b. Update the Vendor on DaVita’s policies regarding appropriate interactions; and
   c. Terminate any training where a Vendor does not comply with DaVita’s policies.

5. The FA will maintain a copy of the Divisional Lead Social Worker’s response to the request.

6. All approved Educational Trainings must be conducted in accordance with the Clinical In-Service Program policy.
E. Transplant Coordinators: Vendor Educational Training for DaVita Teammates:

1. If the Educational Training is not on the list of approved in-services and the training is related to Transplant Coordination Services, the teammate organizing the training will contact their Divisional Paralegal to have a Transplant Coordinator Agreement executed.

2. Upon execution of that agreement, the Transplant Vendor may provide DaVita teammates Educational Trainings that have been approved in accordance with Procedure A above.

Note: Teammates should not schedule an Educational Training until a Transplant Coordinator Agreement has been executed and the Educational Trainings have been approved.

F. Acute Services: Vendor Educational Training for DaVita Teammates:

1. Acute Services teammates may attend Educational Trainings that are coordinated by hospitals with which DaVita has an Acute Agreement.

2. Reviews or approvals of Educational Trainings should be completed in accordance with the respective hospital’s policies and procedures.

G. Meals in Conjunction with Educational Training:

1. Teammates may not solicit Vendors for meals.

2. Vendors may not directly reimburse DaVita for any costs related to meals that DaVita purchases.

3. Teammates may accept a modest meal from a Vendor, if:
   a. A meal occurs in conjunction with an educational training session provided by the Vendor;
   b. The cost of the meal is average or below average for the geographic location;
   c. The meal is subordinate in time and focus to the educational training;
   d. The educational training occurs at a DaVita facility or other appropriate business venue;
   e. The meal is provided to only those teammates who participate in the educational training;
   f. The meal is eaten with the Vendor present; and
   g. Vendor directly pays the caterer or other food supplier.
H. Appropriate Venues for Educational Training:

1. Appropriate venues for Educational Training performed by Vendors include:
   a. Conference or other group space of a DaVita facility;
   b. Conference or other public space of a hospital; or
   c. Banquet room or other space that DaVita has procured for a DaVita meeting.

2. It is appropriate for teammates to attend Educational Trainings performed by Vendors at third-party (non-Vendor hosted) educational conferences or professional meetings, where individuals from other organizations will be in attendance.

3. Inappropriate venues for Educational Trainings performed by Vendors include, but are not limited to:
   a. Restaurants; and
   b. Sports arenas.

I. Off-site Training at Vendor Hosted Events:

1. Teammates may attend Vendor hosted Educational Trainings that occur during work hours, as long as the Educational Trainings meet the following criteria:
   a. The purpose of the training is to learn ways in which DaVita can improve upon its delivery of high-quality care to patients;
   b. The event will be held at a modest venue with no more than modest meals in accordance with Procedure G and Procedure H above;
   c. If the training is open to all members of the professional community and is in compliance with Procedure H.1 above, teammates may attend the Vendor hosted event upon approval from their manager(s); and
   d. DaVita will pay for all teammates’ costs associated with attendance.

Note: Teammates may attend Vendor hosted training events outside of normal work hours, as long as it adheres to our Code of Conduct.
2. If the Vendor hosted event is (i) not open to all members of the professional community or (ii) not in compliance with Procedure I.1 above. Teammates must email the Compliance Department (Team Quest) at QUESTionline@davita.com for review and approval.

Note: Teammates may not make arrangements to attend off-site trainings without approval from Team Quest.

3. Upon approval of the request, the Facility Manager will file a copy of the approval in the teammates’ employee files.

Teammates are expected to report possible violations of this policy and procedure. You may make your report to an appropriate DaVita manager, to the Corporate Compliance Hotline (1-888-458-5848 or DaVitaComplianceHotline.com) or to DaVita’s Corporate Compliance Department (1-888-200-1041 x156037). 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@davita.com.