

ADVENTIST HEALTH CARE, INC.
CORPORATE POLICY MANUAL
USE OF IMPLANTS & SUPPLIES BY PHYSICIANS

Effective Date: 05/20/09
Cross Referenced:
Reviewed: 04/30/10
Revised: 04/30/10

Policy No: AHC 1.18
Origin: OIP/SIO
Authority: EC
Page: 1 of 2

SCOPE:

This policy applies to all Adventist HealthCare, Inc. (“AHA”) entities including, but not limited to, hospitals, nursing homes, home health agencies, long-term care facilities, behavioral health operations, and physician practices.

PURPOSE:

Adventist HealthCare, Inc., (“AHC”) delivers clinical and service excellence through a ministry of physical, mental and spiritual healing in a complex and rapidly changing regulatory environment. In keeping with our core values of respect, integrity, service, excellence and stewardship (“RISES”), and for reasons of patient safety and risk management, AHC has developed this policy to prohibit the use of implants/supplies purchased or brought in by physicians for use on patients at an AHC Entity; only implants/supplies that are purchased by an AHC Entity may be used for treatment on patients seen as an AHC Entity.

POLICY:

AHC requires physicians to use only equipment/supplies that are purchased or provided by an AHC Entity. AHC prohibits physicians from bringing their own equipment/supplies to an AHC Entity for the following reasons:

- A. Risk Management:** Risk management concerns exist because an AHC Entity cannot ascertain the quality/safety of the equipment. AHC could potentially be held liable for any defects and for using equipment that had not been approved through standard AHC and local entity materiel management processes.
- B. Patient Safety:** AHC Entity staff may not have been educated or trained on the equipment.
- C. Federal Anti-kickback Law:** There are potential federal anti-kickback issues if physicians are allowed to profit from billing patients for implants/supplies brought in by the physicians.
- D. Maryland-specific Regulatory Requirements:** Health Services Cost Review (“HSCRC”) regulations require Maryland hospitals to bill for any supplies/services provided to patients in the hospital.

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- E. Pathological Evaluation:** In accordance with the Safe Medical Device Act, AHC will require any implants removed from surgery be sent to pathology for the purpose of pathological evaluation documentation (e.g., serial numbers, defects, condition of implant on explanation). The pathology department will issue a pathology report and take appropriate measures to meet disposition requirements of implant.