

# Device Sales Team — Operating Procedures

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## 1. Team Overview

The Device Sales Team is responsible for revenue generation through direct sales of ACME's FDA-cleared medical devices to hospitals, clinics, and healthcare systems across North America.

## 2. Team Leadership

Role	Name	Contact
VP of Sales	Marcus Chen	mchen@acmemeddevices.com
Regional Director (East)	Sarah Williams	swilliams@acmemeddevices.com
Regional Director (West)	David Park	dpark@acmemeddevices.com
Sales Operations Manager	Jennifer Lopez	jlopez@acmemeddevices.com

## 3. Mandatory Rules

### 3.1 Pricing Authority

- Discounts up to 10%: Sales Rep approval only
- Discounts 11-20%: Regional Director written approval required
- Discounts 21-30%: VP of Sales approval required
- Discounts >30%: CEO and CFO joint approval required — NO EXCEPTIONS

### 3.2 FDA Compliance in Sales Materials

- ALL sales materials must be approved by Regulatory Affairs before use
- NEVER claim off-label uses or unapproved indications
- NEVER modify FDA-cleared marketing language without RA-2024 form approval
- Violation = immediate suspension pending investigation

### 3.3 Anti-Kickback Compliance

- Maximum gift value to HCPs: \$50 per interaction, \$150 annually
- ALL meals with HCPs must be logged in Salesforce within 24 hours
- NO cash equivalents (gift cards, vouchers) to healthcare providers — EVER

## 4. Required Approvals

Action	Approver	Form
Custom pricing agreement	VP Sales + Legal	ACME-PRICE-001
Demo unit placement >30 days	Regional Director	ACME-DEMO-003
Government/VA contract	Legal + Compliance	ACME-GOV-007
International referral	VP Sales	ACME-INTL-002

## 5. Legal Gray Areas & Escalation

### 5.1 Consulting Arrangements with HCPs

If a physician requests a consulting or speaking arrangement, STOP. Do not negotiate terms. Escalate to: Legal Team (Angela Martinez, [amartinez@acmemeddevices.com](mailto:amartinez@acmemeddevices.com)). Fair Market Value assessment required before any agreement.

### 5.2 Competitor Comparisons

Never make comparative claims unless pre-approved by Regulatory Affairs. Document ID: RA-COMP-2024 lists approved comparison statements only.

## 6. Key Contacts

Department	Contact	When to Reach Out
Legal Team	Angela Martinez	Contract review, HCP arrangements
Regulatory Affairs	Dr. Robert Kim	Marketing claims, FDA questions
Compliance	Patricia Nguyen	Anti-kickback concerns
Finance	Thomas Wright	Pricing exceptions