



Hackensack Meridian Health

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Owner: Daniel McManus: Compliance Officer North
Policy Area: Compliance
Applies To: Hackensack Meridian Health Network
Applicability: Hackensack Meridian Health Network

Vendor/Contractor Relationships - Sponsored Training/Travel/Event Policy

Purpose

To establish Hackensack Meridian Health's (HMH) parameters surrounding acceptance of vendor/contractor funding support, promotional training and sponsored seminars, and the travel and accommodations related to these activities. To make clear that, other than as described herein, HMH does not wish to place extra-contractual demands on Vendors.

Administration

The Senior Vice President, Chief Compliance Officer will be responsible for the implementation and subsequent revisions to this policy.

Scope

All Hackensack Meridian Health Network affiliated facilities, including but not limited to, hospitals, ambulatory surgery centers, outpatient imaging centers, home health agencies, long term care facilities, physician practices, service centers, imaging services and all Corporate and affiliated Departments.

Definitions

Vendor a person or entity external to Hackensack Meridian Health who sells or contracts to provide goods, services, or equipment to Hackensack Meridian Health or seeking to do business with either onsite at a Hackensack Meridian facility or from an off-site location.

Team Member: for purposes of this policy, is defined as any employee of HMH. Contracted individuals would be included for purposes of this policy.

Policy

HMH expects Vendors to respect the HMH Code of Conduct and policies and procedures. It also

encourages Vendors to commit in contracts with HMH to adhere to the provisions of the Code of Conduct and policies and procedures which address Vendor interactions with HMH team members and facilities. Vendors who wish to report a violation of this policy are encouraged to call the Compliance ComplyLine. HMH also encourages its Vendors to have an ethics and compliance program, a code of conduct, or other policies and programs demonstrating their commitment to ethical business practices.

1. HMH will comply with The PhRMA Code on interactions with Healthcare Professionals and the Advanced Code of Ethics.
2. HMH also expects Vendors and applicable team members to comply with the New Jersey Rule identified as [Limitations On and Obligations Associated with Acceptance of Compensation from Pharmaceutical Manufacturers by Prescribers](#)" (N.J.A.C. 13:45J) in terms of offering and accepting any benefits and their permissible amounts as defined in that Rule.
3. The only permissible arrangements for Vendor funding of events are those listed below unless an exception is approved in writing by the CEO and Chief Compliance Officer.

HMH may accept funds from Vendors to help underwrite the cost of educational programs sponsored at least in part by the facility , provided that:

- Facility is the sponsor of the Educational Event;
- Educational content and speakers are determined by the facility and not the Vendor;
- Primary purpose and content are for education and not a marketing vehicle for the Vendor;
- Educational Event funds are not connected with any other business transaction;
- Facility and the Vendor enter into a written agreement; and
- Educational Event is otherwise legitimate and bone fide.

1. Research Grants – HMH must not contract with a Vendor for goods or services and at the same time obligate Vendor to provide funding for research grants in connection with its agreement to provide such goods and/or services. HMH may accept funds from Vendors to help underwrite the cost of research grants sponsored at least in part by the facility.
2. Gifts – A gift from a Vendor to a HMH facility as defined in Scope section herein is permissible provided such gift was not solicited and is not provided in connection with a decision to buy products and/or services from the Vendor. This section applies solely to the gifts to the facilities described and not to individual team members. Gifts to team members are addressed in the HMH Code of Conduct.
A Vendor may fund a reception or meal at a meeting or conference provided such is done pursuant to an offer made by the Vendor and not pursuant to a request by HMH.
3. Charitable Functions – a Vendor may be asked to support fundraising efforts on behalf of HMH. These efforts will be coordinated through the Purchasing department and in no case will a decision to do business or a continued business relationship from a particular Vendor is contingent upon a Vendor's contribution.
4. Vendor Promotional Training: is defined as training or education provided directly by any person or entity for the purpose of promoting its products or services, or indirectly at an industry seminar or convention:
 - a. It includes travel paid by a vendor/contractor for HMH personnel to observe the vendor's product in a setting where the product is already installed or otherwise designed to showcase the product(s).
 - b. It does NOT include training provided under a contract with the Company or by a contractor

to facilitate use of products or services it furnishes under an existing contract with HMH or its affiliates.

- c. Vendor-promotional training, including travel and accommodations/ lodging, may be accepted free of charge only when the business value to HMH outweighs any recreational or entertainment value of the training event, provided that the appropriate approvals are obtained in advance as outlined in the procedure described in this policy.
5. Vendor Supplied Meals: Modest meals will be permitted provided that the following provisions are met:
- a. The meal is provided in connection to a bona fide training/education session.
 - b. The on-site training/education is conducted by the vendor.
 - c. The training can only be provided during a time when team members are normally having a meal and this is a meal that HMH would generally have to pay for.
 - d. The offer to provide the meal was made by the vendor and not requested by HMH.
6. Vendor - Sponsored Seminars: refers to seminars, conferences, user review group meetings or other educational sessions sponsored and hosted directly by a vendor/contractor, (i.e. someone doing or seeking to do business with Hackensack Meridian or HMH-affiliated entity.)
- a. It does include offers from vendor/contractors to pay for the registration fees, travel, lodging, and/or meals for HMH team members to attend conferences or seminars sponsored by a person or entity other than the inviting vendor/contractor.
 - b. Provided that the appropriate approvals are obtained in advance, invitations to attend vendor/contractor-sponsored seminars, which may include free or reduced registration fees, travel, lodging and meals, may be accepted only when:
 - i. The event is not limited to Hackensack Meridian or Hackensack Meridian-affiliated companies or purchasing cooperative member participants (e.g., individuals from various companies and organizations have been invited to attend the event);
 - ii. No fee is charged to any invitee or, if a fee is charged for some portion of the event or a reduction given, the same fee is charged or same reduction is given to each invitee; and,
 - iii. The value to HMH must outweigh any recreational or entertainment value of the educational event.

Procedure

A team member, other than a CEO, Senior Vice President or Hospital President, who receives an invitation to attend vendor/contractor-promotional training or - sponsored seminar, which may include travel, lodging or modest entertainment expenses must obtain the approval of his/her team leader and the business unit (e.g. hospital, home care, etc.) Vice President (VP) before accepting the invitation.

1. The invitation recipient will complete the Organizational Ethics form (attachment 1) - Travel to Vendor Sponsored Programs and submit it to their team leader, who will in turn submit it to the business unit VP after his/her review.
2. The team leader and business unit VP (or Chief Operating Officer) will assess the situation, including making a calculation as to the amount of time to be spent on substantive matters as compared to the amount of time spent in recreational or entertainment activities, and the criteria in

9 b. i-iii of this policy. The amount of time engaged in substantive matters must predominate in order for acceptance to be permitted. The team member will provide the team leader (and VP) with sufficient information (such as an event agenda, course description and/or letter of invitation) for the team leader and VP to make the assessments required under this policy. The issuance of Continuing Education Units (CEU), if applicable, for the educational programs offered can be part of the assessment process.

3. If the VP and team leader determine that attendance is preferred despite the entertainment portion predominating over the substantive, the VP must obtain the advance written approval of the Executive Vice President of Hospital Operations or Executive Vice President of Finance & Partner Company Operations for Hackensack Meridian Health, or his/her designee (Executive VP.)
4. If attendance at a vendor/contractor-promotional training event or –sponsored seminar involves travel outside the continental United States or lodging in excess of two nights, the team member must also receive the approval of the Executive VP prior to accepting the invitation.
5. Copies of the approved Travel to Vendor Sponsored Program form will be retained by the VP or Executive VP (as applicable) for 3 years, and must be accessible to the Hackensack Meridian Compliance Officer on request.
6. Senior Vice Presidents and Presidents must follow the procedure outlined here, but submit the form and information for approval to the Executive VP in advance of accepting the invitation.

Vendor Attestation and Reporting

Vendors will attest to compliance with this policy as part of the vendor qualification process (see Administrative policy 4331988) and will be required to report violations of this policy via the Corporate Compliance ComplyLine (see Administrative policy 3438281).

References

Organizational Ethics Form

All revision dates:

2/10/17

Attachments

[Vendor form.pdf](#)

Approval Signatures

Step Description	Approver	Date
	Thomas Flynn: SVP Chief Compliance Officer	05/2021
	Daniel McManus: Compliance Officer North	05/2021

Applicability

Bayshore Medical Center, Carrier Clinic, HMH Nursing & Rehabilitation, Hackensack Meridian Health Inc., Hackensack University Medical Center, Home Health and Hospice, JFK Medical Center, JFK Medical Center EMS, Jersey Shore University Medical Center, Legacy Meridian Health, Ocean University Medical Center, Old Bridge Medical Center, Palisades Medical Center, Physician Services Division, Raritan Bay Medical Center, Riverview Medical Center, Southern Ocean Medical Center, System Search Engine (All Sites)

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