

Adm. Policy No: 1.30
Effective Date: October 2003

SUBJECT: Industry-Sponsored Education/Training

SPONSOR: Corporate Compliance

POLICY: This policy of Heritage Valley Health System (Heritage Valley Beaver and Heritage Valley Sewickley) defines the parameters surrounding acceptance of vendor-promotional training and business associate-sponsored seminars.

PURPOSE: See Above

SCOPE: All employees, providers, and vendors

DEFINITION: Vendor-Promotional Training is defined as training or education provided by any person or entity for the purpose of promoting its products or services. It does **not** include training provided under a contract with VMF or a contractor to facilitate use of products or services it furnished under an existing contract with VMF.

Vendor-promotional training, including travel and lodging, may be accepted free of charge when the business value to VMF outweighs any recreational or entertainment value of the training event provided that the appropriate approvals are obtained in advance.

Business Associate-Sponsored Seminars refers to seminars, conferences, user-review group meetings, or other educational sessions sponsored and hosted directly by a business associate (i.e., someone doing or seeking to do business with VMF or a VMF-affiliated entity). **It does not include offers from business associates to pay the registration fees, travel, lodging, and/or meals for VMF employees to attend conferences or seminars sponsored by a person or entity other than the inviting business associates.**

GUIDELINES: Not Applicable

PROCEDURE:

1. Provided that the appropriate approvals are obtained in advance, invitations to attend business associate-sponsored seminars, which may include free or reduced registration fees, travel, lodging, and modest meals, may be accepted only when:
 - The event is not limited to VMF participants (e.g., individuals from various companies and organizations have been invited to attend the event).
 - 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.
 - The value to VMF outweighs any recreational or entertainment value of the educational event.
2. An employee, other than a Vice President (VP), who receives an invitation to attend vendor-promotional training or a business associate-sponsored seminar, which may include vendor/business associate-paid travel, lodging, or modest entertainment expenses must obtain the approval of his/her Department Director and VP before accepting the invitation. A VP must obtain the approval of the CEO prior to accepting such an invitation.
3. The Department Director 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. The amount of time engaged in substantive matters must predominate in order for acceptance to be permitted. The employee will provide the Department Director and VP with sufficient information (such as a course description and/or program objectives) for the Department Director and VP to make the assessments required under this policy.
4. If the Department Director and VP determine the content or objective of the education/training is predominately entertainment over substantive, the invitation will not be accepted.
5. If attendance at a vendor-promotional training event or business associate-sponsored seminar involves travel outside the continental United States or lodging in excess of two nights, the employee must also receive approval from the VP and Corporate Compliance Officer (CCO) prior to accepting the invitation.

6. Vendor-sponsored promotional training or business associate-sponsored education offered at any VMF facility may include modest meals (snacks, sandwiches) as long as the training/education is determined by the Department Director and VP to be of legitimate educational value to the department staff. Legitimate educational/training opportunities are determined based on the educational needs of the staff in conjunction with the course description and/or program objectives.
7. At no time is any VMF employee to solicit from a vendor or business associates any type of scholarship, payment, or reimbursement for education/training.
8. All questions regarding appropriateness of vendor or business associate sponsored education/training may be referred to the CCO for resolution.

REFERENCES: Federal Anti-Kickback Statute

Approved: October 2003
Reviewed: October 2005; September 2006; September 2007, August 2010, September 2011, August 2012; August 2013; August 2014; August 2015
Revised: September 2009

SIGNATURES:



Victoria Alberti
Corporate Compliance Officer



Norman F. Mitry
President and CEO