

# Vendor Guideline

## Purpose:

The purpose of this guideline is to document Siskiyou Community Health Center's (SCHC) expectations surrounding interactions between Healthcare Professionals and vendors including the acceptance of gifts or gratuities.

## Procedures:

### **Basis of Interactions**

Interactions should be focused on informing healthcare professionals about products, providing scientific and educational information, and supporting health education. Promotional materials provided to healthcare professionals by or on behalf of a company should: (a) be accurate and not misleading; (b) make claims about a product only when properly substantiated; (c) reflect the balance between risks and benefits; and (d) be consistent with all other Food and Drug Administration (FDA) requirements governing such communications.

### **Informational Presentations by Vendor**

#### ***Representatives and Accompanying Meals***

In order to provide important scientific information and to respect healthcare professional's abilities to manage their schedules and provide patient care, company representatives may take the opportunity to present information during healthcare professional's working day, including mealtimes. In connection with such presentations or discussions, it is not appropriate for meals to be offered as a business courtesy to the healthcare professionals as well as members of their staff attending presentations. Siskiyou Community Health Center will provide/purchase meals for staff attending educational presentations.

#### ***Prohibition on Entertainment and Recreation***

Company interactions with healthcare professionals are professional in nature and are intended to facilitate the exchange of medical or scientific information that will benefit patient care. To ensure the appropriate focus on education and informational exchange and to avoid the appearance of impropriety, companies should not provide any entertainment or recreational items, such as tickets to the theater or sporting events, sporting equipment, or leisure or vacation trips, to any healthcare professional who is employed by Siskiyou Community Health Center. Such entertainment or recreational benefits should not be offered, regardless of (1) the value of the items; (2) whether the company engages the healthcare professional as a speaker or consultant, or (3) whether the entertainment or recreation is secondary to an educational purpose. Any items intended for the personal benefit of a healthcare professional should not be offered.

## Disallowed items

Providing healthcare professionals with items that do not advance disease or treatment education is not appropriate, even if these items are practice-related items of minimal value, such as clipboards, pens, mugs or similar items with or without company logos or product names printed on them. Providing such non-educational items could foster misperceptions that the company's interactions with healthcare professionals are not based on providing information about products or health conditions, and therefore companies should not offer non-educational items to healthcare professionals or their staff, even if they are accompanied by educational materials. It would, however, be appropriate for a company to distribute educational brochures without pens or clipboards. Any item intended for the personal benefit of a healthcare professional should not be offered.

## Permissible items

1. It is appropriate for companies, where permitted by law, to occasionally offer items primarily designed for the education of patients or healthcare professionals, as long as such items are not of substantial value (\$100 or less) and so not have a value to the healthcare professionals outside of their professional responsibilities and that those items enhance the quality of services provided to SCHC's medical population.

2. Product samples, including coupons and vouchers that can be used by a patient to obtain samples that are not intended to be sold and are intended to be sold and are intended for patient use.

3. Educational materials and items that directly benefit patients or are intended to be used by or with patients, including the value of an applicable manufacturer's services to educate patients regarding a covered drug, device, biological, or medical supply. Where permitted by law, companies may occasionally offer educational items such as anatomical models for examination rooms, informational sheets and brochures, patient self-assessment and tracking tools, or written materials that inform patients about adherence to medicine regimens, healthy lifestyle choices or the availability of patient assistance programs. Such items should not be of substantial value, i.e. they should be \$100 or less.

## Gifts or Gratuities

All employees are strictly prohibited from soliciting or accepting any individual gift, gratuity, tips, etc. from any patient, visitor, vendor, or associate organization. General gifts of limited value (such as flowers, etc.) to a department, clinic location, etc. as an unsolicited gesture of appreciation by a patient or family are permitted. Employees may not accept anything of monetary value from any person or entity conducting activities with SCHC unless the items/services are medical or clinical in nature and support SCHC's goal of improving healthcare and benefit a medically underserved population.