



**THE BROOKLYN HOSPITAL CENTER**  
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**POLICY AND PROCEDURE MANUAL**

**SUBJECT:** Vendor Relationships #C-186

**RESPONSIBILITY / RESPONSIBILITY:** Administration and Clinical Chairs

**POLICY:**  
The Brooklyn Hospital Center is committed to ethical business and professional behavior which protects the integrity of clinical and managerial decision making. The Hospital expects to conduct business with vendors in a fair and equitable manner in the areas of practice, and research.

The Hospital has adopted the following policies based on best practices in other hospitals and organizations. The application of any of these policies should be brought to a Department Chairman, to a member of our Internal Audit and Compliance.

**Definitions:**

For purposes of this policy, "vendor" means a representative of any supplier, pharmaceutical, medical device, or other company, whether or not The Brooklyn Hospital Center currently purchases goods or services from them.

"Employees" include full-time and part-time employees of The Brooklyn Hospital Center, including medical residents and fellows, and those who are engaged by the hospital under a services agreement.

**Financial Assistance for Travel**

in a legitimate consulting capacity at the event. Any such event should be accredited by the ACCME or a similar body.

B. Financial assistance for residents or medical students to attend ACCME-accredited educational events is permitted as long as the selection of the event is not by the vendor.

C. Vendors may defray the cost of travel for employees to view a system or product under consideration by the hospital for purchase. Such travel and accommodation should be modest, should be at a reasonable rate, and should be for a legitimate business purpose.

It should be understood by the vendor that this reimbursement in no way

D. Vendors may not pay the costs of travel or lodging for spouses of employees.

## II. Honoraria and consulting fees

is a meeting of a recognized professional organization or is an accredited services must be based on the employee's position or expertise. The amount of honoraria must be reasonable. Attendance at the event must not interfere with the employee's responsibilities at the hospital.

B. Compensation as a member of a speakers bureau may only be accepted if the training is extensive, if it will result in increased patient care, and if it is paid at a reasonable fair market value. Venues should be ones in which the investigator presents results of studies to peers with an opportunity for critical exchange.

C. Consulting arrangements between employees and vendors must be accompanied by a written contract and must be for legitimate consulting or advisory activities. Compensation must be at fair market value, and must be limited to the needs of the employee or the hospital. All consulting arrangements are subject to the prior approval of a Department Chairman (or physicians) or of the Chief Executive Officer.

Any employee who serves as a consultant, speaker and as a member of a committee, and whose engagement extends for two years beyond the term of the speaker or consultant engagement.

of any kind, including gifts, merely for listening to a sales presentation by a vendor.

Conflict of Interest policy

A. Meals and refreshments may be accepted in the course of meeting with a vendor representative provided that the purpose of the meeting is business-related; the host is present; the level of expense is reasonable and customary; the frequency of such invitations from one host is not excessive, and attendance is consistent with the employee's duties at The Brooklyn Hospital Center.

B. Vendors may offer meals during presentations of their products, so long as the presentations provide scientific or educational value and the meals are modest.

C. Meals for staff to be consumed without the presence of the vendor are prohibited. This policy applies to hospital physician practices as well as to educational settings.

D. Vendors may not pay to support a departmental holiday party or similar function. An individual vendor representative may pay for a meal limited to a function that is supported by departmental staff.

E. Employees may not accept entertainment or recreational items from vendors including tickets to sporting events, regardless of their value.

F. Gifts or other consideration from vendors must be provided through the vendor to the recipient. Evaluation and selection of recipients will be the sole responsibility of the hospital. No gift pro quo may be involved in any way.

G. Educational programs on site must be made to the hospital, not directly to an employee. The hospital must maintain records of the program, including the program content, facility, educational methods, and materials.

## V. Gifts

A. Gifts from vendors or merchants for beverages and flowers may be accepted on occasion when such gifts are given to support a program.

B. Gifts from vendors or merchants for educational items, such as anatomical models or textbooks, should be of modest value, generally under \$100.

C. Gifts from vendors or merchants for recognition of charitable, civic, educational, or other activities are permissible, as are awards for recognition of charitable, civic, educational, or other activities, provided the value does not exceed \$100.

D. Cash and gift cards which are the equivalent of cash may never be accepted by an employee from a patient or vendor.

## VI. Support for hospital fund raising


A. Vendors may purchase tickets for hospital charity events, such as an annual fund-raising event. Vendors should be given to Administration for distribution to employees. Unused vendor tickets should be given to Administration for distribution to employees.


A. ~~Physicians may participate in unrestricted donation to the hospital with the hospital fund raising or employee recognition events, such as prizes or items to be awarded as long as such arrangements are approved by~~

A. Professional presentations by employees, oral or written, may not be ghost written by any party, industry or otherwise.

**VIII. Equity interests**

A. Physicians who are involved in institutional decision-making concerning the purchase or equipment or the procurement of services, or who have any financial interest (equity ownership, directorship, membership on advisory boards, paid consultancy, or other forms of decision. This is not intended to preclude ownership through mutual funds or equities in publicly traded companies

  
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President and CEO

  
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Senior VP and Chief Medical Officer

  
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VP, Audit and Compliance

Effective 12/1/2008  
Revised 11/10/2011