




**ARROWHEAD REGIONAL MEDICAL CENTER  
Administrative Operations Manual**

POLICY NO. 1000.24 Issue 1  
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<b>SECTION:</b>	<b>COMPLIANCE</b>	<b>SUB SECTION:</b>	<b>GENERAL</b>
<b>SUBJECT:</b>	<b>VENDOR RELATIONS – ACCEPTANCE OF GIFTS AND OTHER BUSINESS COURTESIES</b>		
<b>APPROVED BY:</b>	 _____ Chief Executive Officer		

**POLICY**

Arrowhead Regional Medical Center is committed to maintaining the highest standards of integrity and professionalism in our actions and on behalf of the County of San Bernardino. Consistent with this commitment, ARMC employees subject to this policy may not accept or solicit any gift or other benefit from a vendor or referral recipient that may constitute a conflict of interest. A conflict of interest occurs when reasonable observers could conclude that professional roles are or will be compromised due to the influence by a vendor through gifts or services unrelated to the benefit of patients.

For purposes of this policy, ARMC employees includes, employees (regular and per-diem), volunteers, service contract providers, students of allied health programs, medical students, resident physicians and attending staff.

**PROCEDURES**

1. ARMC employees may not accept any gifts or business courtesy from a Vendor except as specifically allowed in this policy.
2. The following are examples of gifts or business courtesies that are prohibited:
  - a. Personal acceptance of gifts in the form of cash, checks, gift certificates, cash related items, or other tangible, non-perishable items.
  - b. Personal acceptance of a Vendor's good, services, facilities or equipment that are discounted significantly below market value or at no cost.
  - c. Any personal use of a Vendor's personal facilities, equipment or vacation home.
  - d. Any personal trips, vacations, hotel or resort accommodations that are paid for by a Vendor.
  - e. Vendor gifts for the individual recipient's personal benefit, including gifts in recognition of a personal life event (i.e. birthday, anniversary).
  - f. Any off-site business meals which are paid for by a Vendor.
  - g. Acceptance of any gift or business courtesy that takes into account the volume or value of referrals, purchases, or other business generated, or that is given in exchange for the purchase, lease, recommendation, or use of any good, service or item.
  - h. Any gift to a spouse or other immediate family member that could not be accepted directly by the ARMC employee.
3. Should an ARMC employee receive said prohibited gifts in Section 2.a – 2.h., employee must return the gift and report it to their Supervisor. Supervisors are required to report such gifting to the Compliance Officer.
4. Gifts of nominal value, and that are considered non-recurring, such as a holiday gift basket or flowers (perishable item), may be donated, disposed of or shared with the employee's department where return is impractical.

5. Under no circumstances may an ARMC employee enter into an explicit or implicit agreement with a vendor or referral recipient to prescribe a given medication or biomedical device, or for the purchase of a supply or other item/service in exchange for gifts.
6. Vendors may provide refreshments or a meal that is modest in value at a valid educational session for ARMC employees. To be considered a valid educational session, the training must:
  - a. Occur on ARMC's campus;
  - b. Be education based (passing out product information or a Vendor being available for questions when lunch is available does not constitute education based);
  - c. Have a sign-in sheet for all ARMC employees and the Vendor to sign;
  - d. Have an educational agenda for each training session;
  - e. Have the Department determine the educational content; and
  - f. Departments must conclude training with a short post-test or evaluation to verify educational content

Departments hosting educational sessions must keep a copy of all educational sessions sign-in sheets, agendas and post-test/evaluation for audit purposes.

Vendors are prohibited from contacting departments with new product lines or equipment

7. ARMC employees may not solicit vendors or referral recipients for funds or gifts. Any such solicitation for fundraising events (i.e. ARMC Foundation Golf Tournament) must be done through the ARMC Foundation or ARMC Volunteers Department, both 501(c)(3) organizations.
8. Any gifts or donations made to ARMC must be in accordance with County of San Bernardino Policy Nos. 11-08 and 11-08SP. Donors should be advised that acceptance of any gift by the County is tentative and is dependent upon compliance with County Policy and approval of the Board of Supervisors where applicable
9. ARMC is a member of the University Health System Consortium and strictly follows contract guidelines through our Group Purchasing Organization. In addition, per County of San Bernardino Policy No. 11-02, "Employees shall be expected to, at no time or under any circumstances, accept directly or indirectly, gifts, gratuities, or other things of value in violation of County policy or State law from suppliers, or which might influence or appear to influence procurement decisions; to refuse to accept any form of bribery, prevent any appearance of so doing and to report to a supervisor any offer of a gift or gratuity which violates County policy or State law, of the offer of any bribe.
10. At times, a contracted vendor may pay for ARMC employees to attend training/conferences, and/or reimburse travel, meals and/or other benefits as a condition of an approved contract or purchase order. In such an instance a California Form 801 must be completed which discloses payments made to ARMC when the payments provide a personal benefit to an official of ARMC (i.e. off-site training session for a new piece of equipment).
11. Per the County of San Bernardino, Conflict of Interest Code, designated ARMC employees are required to fill out an annual Statement of Economic Interest, Form 700. This Form requires filers to disclose certain personal financial holdings as defined in the Act's stated purposes: Assets and income of public officials which may be materially affected by their official actions should be disclosed and in appropriate circumstances the officials should be disqualified from acting in order that conflicts of interest may be avoided. (California Government Code, Section 81002(c).)
12. Violations of this policy are subject to disciplinary action in accordance with applicable disciplinary policies.

**REFERENCES:**  
**County of San Bernardino Policy No. 11-02**  
**County of San Bernardino Policy No. 11-08**  
**County of San Bernardino Policy No. 11-08SP**

**DEFINITIONS:** Vendor: A company doing or seeking to do business with ARMC.

Referral Recipient: A person, entity or an employee or representative of a person or entity that receives or could potentially receive patient referrals from ARMC.

**ATTACHMENTS:** N/A

**APPROVAL DATE:** 5/19/11 Administration  
N/A Quality Management Committee  
N/A Medical Executive Committee

**REPLACES:** N/A

**EFFECTIVE:** 5/19/11                      **REVISED:** N/A

**REVIEWED:** 4/04/13

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