

Applicable to:

This policy is applicable to all employees of Harmony Community Healthcare and Vendor representatives who access resident care areas of Harmony Community Healthcare.

Policy:

Harmony Community Healthcare recognizes that from time to time, non-organizational personnel, including vendor representatives, can play an important role in resident care and may be present in resident care areas at the request of the Administrator or Department Managers.

Implementation:

Confidentiality: The vendor representative:

- Shall not be given access to any schedule showing resident names;
 - Shall not procure information from the resident’s chart.

Compliance: Employees shall report actual or alleged violations of these guidelines concerning Vendors to the Administrator.

Actual or alleged violations of this policy may be reported on an anonymous basis to the Corporate Compliance Hotline toll free **1-877-532-8879**.

Reported violations of this policy will be investigated by the Harmony Community Healthcare corporate compliance committee.

Vendor discipline for violating this policy: Vendors who violate this policy will be addressed as follows:

- 1st violation – Warning letter to the individual and their supervisor, and, may also lead to suspension of visitation privileges for 30 days.
 - 2nd violation – Visitation privileges suspended for 30 days.
- 3rd violation – Barred from Harmony Community Healthcare permanently.

Question and Answers
Frequently Asked Questions
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<p>General Policy Q and A:</p> <p>1. What is a conflict of interest?</p>	<p>A conflict of interest is a situation where an employee has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties and/or professional judgment especially if those interest or commitments are not disclosed.</p>
<p>2. What is a potential conflict of</p>	<p>A situation that may develop into an actual</p>

interest?	conflict of interest.
3. What is an appearance of a conflict of interest?	A reasonable person would believe that a situation exists where official duties or professional judgment would be compromised. The mere appearance of a conflict may be as serious and potentially damaging as an actual conflict.
4. How do I determine if I have a conflict of interest?	You should ask yourself if the situation would interfere or even have the appearance of interfering with the independent judgment you should show when performing your professional duties.
5. Why do we have to be concerned about conflict of interest?	There are laws that prohibit certain conflict of interest situations. In addition, conflicts of interest may adversely affect public perception of you and the organization, as well as, adversely affect internal perception.
6. Who are subject to conflict of interest and vendor policies?	All employees working and vendors associated with Harmony Community Healthcare.
7. Why is there a policy on conflict of interest related to relationships with vendors?	Gift giving has been a customary practice and has served an important and beneficial function for our employees and patients alike. But even when gift giving is practiced within established ethical boundaries, the perception of conflict of interest is raised and resident and public trust may be eroded. In addition, the relationships that vendors have with health care professionals have been and will continue to be closely scrutinized by the government.
8. Why do vendors give gifts to employees?	Gifts serve the function of reminders of the vendor company name and help vendors establish a relationship with us.
9. Why vendors might wish to comply with our conflict of interest policies?	Vendors have already placed their own restrictions on gifts and vendor interactions with clients. These types of policies are becoming common in the health care industry.
10. Who is going to enforce compliance with the guidelines?	The most important step will be educating or vendors regarding our policies. This education will be accomplished by Department Managers providing information to the vendor.

Gifts:	
1. May I accept vendor logoed items (i.e. pens, post-its, coffee mugs) that are given away by vendors at a conference that I attended?	You may accept the vendor logoed items, but you may not bring them to Harmony Community Healthcare work place.
2. I have post-its and pens that have a trade association's name on them. Can I bring them to work at Gundersen Harmony Care Center?	Trade associations are not considered vendors so items with their name or logo can be brought on campus as long as they do not also include a vendor's logo.
3. If I have a lunch bag with my bank's logo on it. Can I bring that to work at Gundersen Harmony Care Center?	If Harmony Community Healthcare does not consider your bank a vendor, that is, we do not pay them for services; the lunch bag can be used at Harmony Community Healthcare.
4. One of the vendors that we regularly do business with has offered to give gift cards in appreciation for certain employees in our department. Is that okay?	No. The gift card is considered a "gift" as defined in our policies, and they cannot be accepted.
5. Vendors often engage third parties to provide departmental gifts at holidays. What should we do with those gifts?	You should donate such gifts to Harmony Community Healthcare Foundation. In addition you inform the vendor that we may no longer accept their "gifts" as the term is defined under our policies, and if they would like to make a donation, they can contact the Administrator who will direct them the Harmony Community Healthcare Foundation.
6. Are product samples allowed?	Yes; however, product samples must be requested and received by the Business Office as a no charge purchase.
7. Are drug samples allowed?	Yes, drug samples are allowed. Drug samples and other resident care items (such as food samples, blood sugar meters and strips, peri-care products, incontinent products and so on) are exempt from the definition of "gift" in our policies.
8. I received an anatomical model from a vendor and it has the vendor's logo on it, is this allowed?	Yes, this would be considered educational material and is exempt from the definition of "gift" as defined under our policies.
Food and Beverages:	
1. Why prohibit vendors from bringing food and beverages into Gundersen Harmony Care Center?	Even small gifts have been shown to engender a sense of obligation on the part of the recipient. Thus, gifts including meals provided by vendors, can influence our decision making process. The goal of these policies is to ensure objectivity on the

	business decisions made by Harmony Community Healthcare employees.
2. May vendors supply refreshments or food for educational activities sponsored by our department?	No. However, a vendor may donate funds to Harmony Community Healthcare Foundation and the Foundation will determine how those funds are used.
3. If a vendor is allowed to donate funds to the Foundation, and the Foundation decides to purchase food for other activities, isn't that the same as the vendor directly supplying food for the activity?	No, there is a significant difference. The Foundation, not the vendor, decides how the funds are distributed.
4. May I attend a lunch with a vendor who wishes to discuss a new product for use by Harmony Community Healthcare?	You may attend the lunch to consider the product, but you may not allow the vendor to pay for the cost of your lunch. The vendor "treating lunch" would be considered a "gift".
5. A local restaurant is providing lunch at Gundersen Harmony Care Center for employees to purchase. Is the restaurant considered a vendor in this case?	The practice is allowed and the restaurant is not considered a vendor.
6. Is it okay to ask vendors to bring in snacks for an appreciation week for our employees?	No. Vendors are not allowed to bring food or beverages into Harmony Community Healthcare.
Education and Travel:	Vendors are permitted to provide educational grants to Harmony Community Healthcare Foundation.
1. What is the process for vendor companies to fund educational conferences?	
2. What if a vendor offers to provide education or presentations that are clearly not related to their product?	Education or presentations that are not related to the vendor's product need to be paid for by Harmony Community Healthcare.
3. Can I attend a vendor sponsored event or education session if it is at a restaurant and the vendor pays for the meal?	After hours or off site meals, entertainment or events sponsored by vendors and which include an educational component, are acceptable if the meal or activity is less than \$50 per meal/event and does not exceed \$338 in the aggregate per year and per vendor.
4. An employee attends an annual educational conference that is sponsored by a professional society/association and has been invited (by the conference and not a vendor) to give a presentation at the	No. In this example, the lecture would be considered service provided to the event organizer and not the vendor. Since the employee is not providing service to the vendor, payment by the vendor to the faculty member would be considered a

<p>conference this year. Can a vendor pay for the employee making a presentation's travel and hotel cost? What about an honorarium for the speech, or the registration/admission fee?</p>	<p>"gift" and would not be allowed. Payment by the professional society/association, however, is allowed.</p>
<p>5. If I attend an annual educational conference, can my travel and hotel costs be paid for by a vendor?</p>	<p>No. Our policies allow a vendor to cover reasonable travel and lodging costs, as well as payment of a reasonable honorarium only if the employee serves as a legitimate faculty member at the conference. No honoraria, travel or lodging costs may be covered by the vendor if the employee is simply attending the conference.</p>
<p>6. A vendor representative has made an educational grant to the Harmony Community Healthcare Foundation to support education. At the education meeting can I provide 5-10 minutes for the vendor to speak about their products?</p>	<p>No. Vendors are prohibited from promoting or marketing products as a part of education programs held at Harmony Community Healthcare. They are allowed to display information at an education meeting with permission from the Administrator.</p>
<p>Vendor Information Brochures/Leaflets: 1. Can vendor representatives place information in employee's mail boxes or request that information be distributed to employees?</p>	<p>No. Vendors cannot place information in the mailboxes of employees, nor may vendors post materials on bulletin boards within the Harmony Community Healthcare facility. Vendors may provide to employees only information requested by such employees.</p>
<p>Other considerations: 1. If I win a vendor logoed item can I bring it to Gundersen Harmony Care Center work?</p>	<p>No. You may accept the prize, but you may not bring <u>vendor logoed</u> items to Harmony Community Healthcare work.</p>
<p>2. We solicit vendors to support various fund raising events at Gundersen Harmony Care Center that are in line with our mission. Is that okay?</p>	<p>Yes. All donations from vendors for fund raising events that are in line with Harmony Community Healthcare's mission are furnished through the Harmony Community Healthcare Foundation. This ensures that the vendor is removed from the decision making as to whom items are furnished.</p>
<p>How can you help?</p>	<p>In order to be successful with vendor education about our policies, everyone must commit to a 'shared responsibility' of enforcement of them.</p>

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