

Title: GME Vendor Interactions	*Applicable to: Beaumont Health	Effective Date: 03/27/2018
		Last Periodic Review Date: 03/27/2018
Policy Owner: Graduate Medical Education Committee	Document Type: Policy	Functional Area: GME Human Resources

***For This Document, Beaumont Health Includes:**

Beaumont Corporate Shared Services
 Beaumont Hospital, Dearborn
 Beaumont Hospital, Farmington Hills
 Beaumont Hospital, Grosse Pointe
 Beaumont Hospital, Royal Oak
 Beaumont Hospital, Taylor
 Beaumont Hospital, Trenton
 Beaumont Hospital, Troy
 Beaumont Hospital, Wayne
 Beaumont Medical Group

I. PURPOSE

The purpose of this policy is to outline portions of the Beaumont Health policies which apply to resident and fellows and provide guidance for interactions with vendors.

II. POLICY

- A. Beaumont Health (Beaumont) is committed to conducting its business ethically and in compliance with all applicable laws, regulations and internal policies. The [Beaumont Health Business Ethics and Compliance Policy](#) provides information about the principles and guidelines that support the **Beaumont Health Code of Conduct** as well as Beaumont Health’s mission, vision and values. This Policy helps residents/fellows understand how to conduct business ethically and consistent with the legal requirements that apply to their assigned duties and responsibilities. This Policy also describes the Institutional Conflict of Interest Program.

- B. Adherence to provisions of this Policy is expected when dealing with patients, families, fellow Beaumont workforce members, our communities, the public, the business community, payors, vendors, and government and regulatory authorities. Beaumont workforce members may be subject to disciplinary or corrective action, up to dismissal and termination, for failing to adhere to the principles and requirements set out in this Policy.

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III. RELATIONSHIPS WITH VENDORS

(Excerpts from Section VI from the *Beaumont Health Business Ethics and Compliance Policy*)

A. Residents/fellows must separate as much as possible the influence of industry and vendors from the decision-making and business activities of Beaumont, practice of medicine, education of Beaumont workforce, and the delivery of health care services. Beaumont workforce must not incur or maintain any kind of financial or personal obligation or interest that would affect good judgment in transacting business on behalf of Beaumont. Any appearance of impropriety or influence over a Beaumont workforce member’s decision-making on behalf of Beaumont Health is strictly prohibited. The following provisions set out the permissible and prohibited interactions with vendors and industry:

1. **Loans from Vendors:** Loans from vendors, of either a personal or business nature, may not be received by Beaumont workforce.
2. **Vendor and Industry Financial Support for Continuing Education:** Medical Administration or other Beaumont professional departments which offer formalized continuing education programs under a specific professional group’s mandated oversight, rules, or guidelines, may directly receive and administer vendor and industry financial support for these continuing education programs. The department must make the decisions regarding the disposition and disbursement of the vendor or industry financial support.
 - a. Vendor or industry financial support for education activities that serve a legitimate Beaumont business purpose, but which are not sponsored by professional groups as a part of a formalized continuing education program must be submitted to the Beaumont Foundation. The Executive Vice President and Chief Financial Officer is responsible for the financial controls to be used by departments and the Beaumont Foundation in disbursing the financial support for these education activities not subject to professional group oversight.
 - b. Vendors and industry must never provide direct financial support such as refreshments or meals.
3. **Vendor-and Industry-Sponsored Training, Conferences and Seminars:** Beaumont is committed to ensuring there are no perceived or actual conflicts of interest between industry and Beaumont workforce when they attend, participate in, or organize training, conference, seminar, and clinical meeting activities. Decisions concerning educational opportunities for Beaumont workforce, including financial support, or decisions to attend educational programs, lectures, or provide materials must be made without perceived or actual conflicts.

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- a. Industry or vendor financial support for Beaumont workforce participation through scholarships or reimbursement of travel or training expenses is permitted only if the following stipulations are met:
 1. Those enrolled in the course are selected based on appropriate qualifications by the department, division, or program;
 2. Monies provided in support of education efforts must be directed to the Beaumont Health Foundation. Such monies may be designated to support a particular department or program;
 3. The department, division, or program has determined the monies are for *bona fide* educational activities or functions; and
 4. The recipient of monies is not subject to any implicit or explicit *quid pro quo*.
 - b. An exception exists for vendor-sponsored travel and/or meal expenses that have been incorporated into a fully executed contract that has been approved by the appropriate senior level administrator and Chief Compliance Officer or their designee.
 - c. Beaumont is responsible for educational opportunities provided at Beaumont Health locations for the Beaumont workforce. Beaumont does not permit unsupervised education by industry or vendor representatives to residents, fellows, physician extenders, nurses, or other Beaumont workforce. Industry or vendor representatives who are permitted on-site and supervised must be registered in the Vendormate System.
 - d. Educational opportunities must be evidence-based and not biased by particular vendor or industry interests. Continuing educational events on Beaumont premises, sponsored by industry or Beaumont, must be fully compliant with the guidelines of the appropriate accrediting organization regardless of whether formal continuing education credit is awarded or not.
4. **Provision of Free Drug, Device and other Product Samples:** Beaumont generally prohibits the receipt of free drugs, devices, or other product samples by Beaumont workforce. Use of free vendor services, products, or samples for the purpose of evaluation as part of the selection or purchasing process may be permitted. Please refer to Beaumont Health Supply Chain Policies.
 5. **Vendor Access to Beaumont Health Premises:** Beaumont is committed to ensuring the privacy and safety of patients, their families and the Beaumont workforce on-campus and off-campus by limiting vendor access to Beaumont Health premises unless prior arrangements are made.

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IV. REFERENCES

Accreditation Council of Graduate Medical Education (ACGME) Institutional Requirements, Section IV.K

Approved by the Beaumont Health Graduate Medical Education Committee (GMEC), June 20, 2017

CORPORATE AUTHORITY:

Beaumont Health (“BH”) as the corporate parent to William Beaumont Hospital, Botsford General Hospital, and Oakwood Healthcare Inc., (“Subsidiary Hospitals”) establishes the standards for all policies related to the clinical, administrative and financial operations of the Subsidiary Hospitals. The Subsidiary Hospitals, which hold all health facility and agency licenses according to Michigan law, are the covered entities and the providers of health care services under the corporate direction of BH. The Subsidiary Hospitals’ workforces are collectively designated as BH workforce throughout BH policies.