




**LOYOLA UNIVERSITY MEDICAL CENTER
ADMINISTRATIVE POLICY NUMBER: PS-12**

Subject: Vendor Funding for Off-site Promotional Training and Seminars	
Date Implemented: August 2005	Date Revised: September 20, 2005, October 15, 2007
University Administration Approval:  <hr/> Paul K. Whelton, M.B., M.D., M.Sc. President and Chief Executive Officer Loyola University Health System/ Loyola University Medical Center Vice President for the Health Sciences Loyola University of Chicago	Medical Center Administration Approval:  <hr/> Michael Scheer Senior Vice President, Chief Financial Officer and Treasurer Loyola University Health System/ Loyola University Medical Center Physician Foundation Approval:  <hr/> Stephen Valerio President and Chief Executive Officer Loyola University Physician Foundation

I. PURPOSE

The Loyola University of Chicago's Stritch School of Medicine (SSOM), Loyola University of Chicago's Neihoff School of Nursing (SON), Loyola University Health System (LUHS), Loyola University Medical Center (LUMC) and Loyola University Physician Foundation (LUPF), (collectively "Loyola") desire to establish the parameters surrounding acceptance of Vendor funding for attending off-site Vendor-sponsored seminars, training and other kinds of meetings.

I. DEFINITIONS/APPLICATIONS

A. Definitions

1. Annual Disclosure Statement – The Statement certain Colleagues are expected to fill out annually. See the Conflicts of Interests and Disclosure of Certain Interests Policy P-17 for more details on the Annual Disclosure Statement and its reporting process.
2. Colleague – A Colleague(s), for purposes of this policy, is defined as any of the following:
 - a. Employees of LUHS, LUMC and LUPF
 - b. Employees of LUC working on the Maywood campus, including SSOM and SON
 - c. Graduate Medical Education residents and fellows
3. Department Chairperson – Department Chairperson, for purposes of this policy means the Chair of a clinical or basic sciences department of the SSOM, Chair of a department of the SON, the Medical Director of the LUMC Emergency Department or the Primary Care Division,

LOYOLA UNIVERSITY MEDICAL CENTER ADMINISTRATIVE POLICY NUMBER: PS-12

as applicable.

4. Supervisor – A Supervisor, for purposes of this policy is defined as follows:
 - a. For faculty, the Department Chairperson
 - b. For Department Chairpersons, the Dean of the SSOM or SON as applicable.
 - c. For non-faculty employees, his/her Vice President or Associate Dean, as applicable
 - d. For Associate Deans, the Dean of SSOM or SON, as applicable.
 - e. For Vice Presidents or higher, the Senior Vice President or President as applicable
 - f. For residents and fellows, the Department Chairperson
5. Vendor – A Vendor, for purposes of this policy, is defined as an entity doing or seeking to do business with Loyola.
6. Vendor-promotional training – Training or education provided by a Vendor for the purpose of promoting its products or services. It does not include training provided under a contract with Loyola or by a contractor to facilitate use of products or services it furnishes under an existing contract with Loyola.
7. Vendor-sponsored seminars – Seminars, conferences, user review group meetings or other educational sessions sponsored and hosted directly by a Vendor and made available to various customers of Vendor. It does not include offers from Vendors to pay the registration fees, travel, lodging and/or meals for Loyola colleagues to attend professional association conferences. See Vendor Relations Policy PS-10.
8. Vendor-sponsored site visits – Visits to health care facilities, universities or some other business for the purpose of viewing the Vendor's product and interviewing Vendor's customers about the Vendor's products and services.

B. Applications

This policy applies to Colleagues as defined in this policy.

III. PROCEDURE/INFORMATION

- A. Vendor-promotional training, Vendor-sponsored seminars and Vendor-sponsored site visits, including registration fees, travel and lodging, as applicable, may be paid for by the Vendor when the business value to Loyola outweighs any recreational or entertainment value of the event, provided that the appropriate approvals are obtained in advance.
- B. Any Colleague who receives an invitation to attend a Vendor-promotional training, Vendor-sponsored seminar or Vendor-sponsored site visit, should obtain his/her Supervisor's prior approval.
- C. The Supervisor will assess the situation, including making a calculation as to the amount of time to be spent on substantive matters as compared to the amount of time spent in recreational or entertainment activities.
- D. The amount of time engaged in substantive matters should predominate in order for acceptance to be permitted.
- E. The Colleague will provide the Supervisor with sufficient information (such as a course description and/or the letter of invitation) to make the assessments required under this Policy.
- F. If the Supervisor determines that attendance is preferred despite the entertainment portion predominating over the substantive portion, the Chief Compliance Officer should be consulted.
- G. If the Supervisor's approval is obtained, a Vendor may sponsor a Vendor-promotional training or Vendor-sponsored seminar at an off-site location in conjunction with this Policy, such as a reception or meal (e.g., Journal Club), and underwrite the entire cost of this activity without processing payment through Loyola provided the Vendor handles all arrangements for the event such as location, invitations, menu and publicity (i.e., it is a separate function clearly hosted by the Vendor). Meals, receptions, and hospitality should be modest in value and should be subordinate in time and focus to the purpose of the activity, and the "per person" expense should not exceed \$50.
- H. Vendors may not pay for activities covered by this Policy attended by spouses or other guests of Colleagues.
- I. Invitees to Vendor-promotional training or Vendor-sponsored seminars should not be limited to

**LOYOLA UNIVERSITY MEDICAL CENTER
ADMINISTRATIVE POLICY NUMBER: PS-12**

Colleagues (e.g., individuals from various companies and organizations have also been invited to attend the event or the event is made available at other times to individuals from other companies and organizations on comparable terms).

- J. No fee should be charged to any invitee or, if a fee is charged for some portion of the event or a reduction given, the same fee is charged or same reduction is given to each invitee.
- K. If attendance at a Vendor-promotional training event, Vendor-sponsored seminar or Vendor-sponsored site visit involves travel outside the continental United States or lodging in excess of two nights, the Colleague should also provide advance written notice to the Chief Compliance Officer.
- L. Any Vendor-promotional training, Vendor-sponsored seminars and Vendor-sponsored site visits should be disclosed on the Colleague's Annual Disclosure Statement. See the Conflicts of Interests and Disclosure of Certain Interests Policy P-17 for more details on the Annual Disclosure Statement reporting process.
- M. All activities/interactions with for-profit companies should adhere to the LUHS Logo Use Endorsements & Compliance with Tax-Exempt Status Requirements Policy A-31.

IV. RESPONSIBLE PARTY

The LUC Vice President for the Health Sciences, the LUHS/LUMC President & Chief Executive Officer and the LUPF President and Chief Executive Officer, as applicable and in collaboration with the appropriate Chief Compliance Officer, should use all necessary authority to implement this policy, enforce it, and assess its effectiveness from time to time. Questions regarding this Policy should be addressed to the Chief Compliance Officer at x62036.

Supervisor Approval Form

Instructions:

1. This form should be used to obtain your Supervisor's pre-approval as required by any of the following policies:
 - a. Vendor Access – PS-6.
 - b. Vendor Relations – PS-10.
 - c. Vendor Receipt of Vendor Funds for Educational Events – PS-11.
 - d. Vendor Funding for Off-Site Promotional Training and Seminars – PS-12.
 - e. Permissible Arrangements between Colleagues & Vendors Policy – PS-13.
 - f. Itinerant Vendors – PS-18.

2. Supervisor, for purposes of this form means:
 - a. For faculty, the Department Chairperson
 - b. For Department Chairpersons, the Dean of SSOM or SON as applicable,
 - c. For non-faculty employees, his/her Vice President or Associate Dean, as applicable
 - d. For Associate Deans, the Dean of LUC-SSOM
 - e. For Vice Presidents or higher, the Senior Vice President or President as applicable
 - f. For residents and fellows, the Department Chairperson

3. The Supervisor should maintain a copy of this form in the Colleague's personnel file.

4. The staff member completing this form should retain a copy of the form in his/her departmental files.

Reason Supervisor Approval is requested:

- Vendor funded educational event
- Vendor funded attendance at professional association conference
- Vendor promotional training
- Vendor sponsored seminar
- Vendor sponsored site visit
- Consulting services performed by Loyola staff for vendor
- Speaking engagements performed by Loyola staff for vendor
- Vendor booth on-site at Loyola

General Information:

Name of Person Completing this Form: _____
 Phone Number: _____ Department: _____

Vendor Information:

Vendor: _____

Program/Event/Service Information:

Title/Subject matter: _____

Description of Program/Gift/Compensation to be received: _____

Purpose/Benefit: _____

Dollar Amount: _____

Signature of Requestor:
Signature of Supervisor if approved:

 Signature
 Dated: _____

 Signature
 Dated: _____