

GIFTS FROM VENDORS, SUPPLIERS AND CONSULTANTS

Administrative Policy	
Approved: November 2011	Next Review: November 2014
Department: All departments	
Population Covered: All Swedish employees	

Purpose

To establish a standard governing the acceptance and use of gifts from vendors, suppliers and consultants to avoid any real or perceived conflict of interest and to protect the integrity of our relationships with patients. This policy also applies to Swedish Physician Division. The *Conflict of Interest and Fiduciary Duties of Management and Others with Significant Administrative Responsibility* still applies to certain employees.

Responsible Persons

All Swedish employees.

Policy

A gift provided to an employee for the purpose, effect or appearance of facilitating a future business transaction is prohibited by vendors, suppliers and consultants. This standard protects the integrity of Swedish's relationship with patients and avoids any real or perceived conflict of interest. This standard is intended to apply mainly to activities on Swedish controlled property.

1. Neither employees nor their families may accept or use gifts from current or potential vendors, suppliers or consultants to Swedish if the gift has the purpose, effect or appearance of facilitating a future business transaction. This includes vendors providing gifts of food in conjunction with the provision of needed business information.

Patients may be inadvertently influenced by promotional business items he/she see providers, nurses, clinicians and other employees using in the course of work at Swedish. At a minimum, this activity creates the appearance of a potential conflict of interest. For example, a nurse carrying a tote bag or coffee cup with a logo for a name brand pharmaceutical may cause a patient to perceive that Swedish or the employee endorses the drug.

2. Employees receiving offers of gifts are encouraged to direct the prospective donor to the SMC Foundation, Director of Corporate Relations at 206-386-3194. For example, a vendor offering tickets to a sporting event should instead be encouraged to make a donation to the SMC Foundation.

Support of SMC-sponsored educational activities

1. Acceptance of funds from vendors, suppliers, or consultants for support of continuing education activities under the control of an accredited continuing education provider and approved by Swedish CME must be in compliance with the *Continuing Medical Education Accreditation*

- Reference Manual* published by the SMC Department of Continuing Medical Education. The Reference Manual is designed to meet the Standards for Commercial Support approved by the Accreditation Council for Continuing Medical Education (ACCME).
2. Acceptance of funds from vendors, suppliers or consultants for SMC nursing or other clinical disciplines must meet the guidelines of Continuing Education Approval and Recognition Program Requirements (CEARP) as determined by the Director of Clinical Education & Practice.

Donations in Support of SMC Services

1. Swedish welcomes the financial support of our business partners to further Swedish's mission and improve the facilities, equipment and services provided to our patients.
2. All donations by vendors, suppliers, consultants and other business partners are received, managed and monitored by the Swedish Medical Center Foundation.
3. Individuals and departments receiving offers of support are to assist the donor in contacting Corporate Relations within the SMC Foundation.

Acceptance of invitations made by vendors, suppliers, consultants or other business partners to Swedish employees for attendance at SMC Foundation sponsored fundraising activities is considered acceptable as long as it is understood that it will not influence purchasing decisions.

Definitions

Gifts. Items, goods or services of any kind bestowed without compensation, no matter how small (e.g., promotional business items that displaying a vendor logo, pen, food, tickets to events, trips, discounted product or service, anything of value); educational information (e.g., textbooks, seminars, conferences, lectures); medication samples. (**NOTE:** This definition does not include training required for utilizing a vendor's product, as this is considered needed business information.)

Supplemental Information

None.

Regulatory Requirement

Internal Revenue Code § 501(c)(3).

References

SMC CME Accreditation Reference Manual, including referenced policies.

SMC Policy [Code of Conduct](#).

SMC Policy [Conflicts of Interest and Fiduciary Responsibilities of Management and Other Individuals with Significant Administrative Responsibility](#).

SMC Policy [Pharmaceutical Vendor Guidelines](#).

SMC Policy, [Supply Chain Procurement: New Product Review, Evaluation and Selection](#)

Addenda

[Swedish Health Services Guidelines for Policy](#)

STAKEHOLDERS

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Swedish Ethics Committee
Swedish Conflicts of Interest Committee

Sponsor

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