



<b>TITLE:</b> Vendor Promotional Training Policy	<b>POLICY DESCRIPTION:</b> Vendor Funding for Off-site Promotional Training and Seminars
<b>PAGE:</b> 1 of 2	<b>TYPE:</b> Compliance and Ethics
<b>EFFECTIVE DATE:</b> August 1, 2004	<b>REFERENCE NUMBER:</b> HPG.007

<p><b>SCOPE:</b> All HPG colleagues for all HPG departments.</p>
<p><b>PURPOSE:</b> To establish the parameters surrounding acceptance of Vendor funding for attending Vendor-sponsored seminars, training and other kinds of meetings.</p>
<p><b>POLICY:</b></p> <p>Vendor-promotional training, including travel and lodging, may be paid for by the Vendor when the business value to HPG outweighs any recreational or entertainment value of the event, provided that the appropriate approvals are obtained in advance.</p> <p>Provided that the appropriate approvals are obtained in advance, invitations to attend Vendor-sponsored seminars, which may include Vendor payment for all or part of registration fees, travel, lodging and meals, and may be accepted by HPG Colleagues only when:</p> <ol style="list-style-type: none"> <li>1. the event is not limited to HealthTrust Purchasing Group member participants (<i>e.g.</i>, individuals from various companies and organizations have 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);</li> <li>2. no fee is 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; and</li> <li>3. the value to our organization outweighs any recreational or entertainment value of the educational event.</li> </ol>
<p><b>DEFINITIONS:</b></p> <p><b>HPG Colleague or Colleagues:</b></p> <ol style="list-style-type: none"> <li>1. Employees of HCA Management Services, LP who work full-time or part-time for HPG under a management contract; and</li> <li>2. Clinical Committees and Advisory Board Members: individuals who either work full-time or part-time for HPG or are HPG member employees, and who participate on any advisory board or clinical committee for HPG.</li> </ol> <p><b>Vendor</b> – Any entity doing or seeking to do business with HPG.</p> <p><b>Vendor-promotional training</b> - Training or education provided by any person or entity for the purpose of promoting its products or services. It does <b>not</b> include training provided under a contract</p>



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with HPG or by a contractor to facilitate use of products or services it furnishes under an existing contract with HPG.

**-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 HPG colleagues to attend conferences or seminars sponsored by a person or entity other than the inviting Vendor.

**PROCEDURE:** Any HPG Colleague, who receives an invitation to attend Vendor-promotional training or a Vendor-sponsored seminar, which may include travel, lodging or modest entertainment expenses must obtain the approval of his/her supervisor and the HPG ECO before accepting the invitation. Any HPG Vice President must obtain the approval of the HPG ECO and HPG President.

The supervisor and HPG ECO 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. The amount of time engaged in substantive matters must predominate in order for acceptance to be permitted. The employee will provide the supervisor and HPG ECO with sufficient information (such as a course description and/or the letter of invitation) to make the assessments required under this policy.

If the HPG ECO and supervisor determine that attendance is preferred despite the entertainment portion predominating over substantive, the ECO must receive the advance written approval of the HPG President.

If attendance at a Vendor-promotional training event or Vendor-sponsored seminar involves travel outside the continental United States or lodging in excess of two nights, the employee must also receive approval from the HPG President prior to accepting the invitation.

**REFERENCES:**

HPG Code of Conduct, July 1, 2004

HPG Business Relationship Statement, July 1, 2004