



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Colleague Participation in Educational, Training and Promotional Events of Others
PAGE: 1 of 5	REPLACES POLICY DATED: 08/01/04, HPG.007, Vendor Funding for Off-site Promotional Training and Seminars; HT.007, 11/02/12
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.007
APPROVED BY: HealthTrust Ethics and Compliance Committee	

<p>SCOPE: All departments within HealthTrust Purchasing Group, L.P. (“HealthTrust LP”) and its direct and indirect subsidiaries including HealthTrust-Europe LLP; the representative office of HealthTrust in Shanghai (“Shanghai Office”) (collectively, “HealthTrust”); and all Advisory Boards.</p>
<p>PURPOSE: To establish parameters for attendance by HealthTrust Colleagues at Industry/Professional Events and Supplier Events.</p>
<p>DEFINITIONS: Capitalized terms are defined. See back pages of this policy.</p>
<p>ESSENTIAL INFORMATION: <i>This is a summary of selected topics. Please read this entire document for full information.</i></p> <p>This policy applies to Supplier Events and Industry/Professional Events such as conferences, trade shows and customer forums that involve many participants in addition to HealthTrust Colleagues. It covers necessary approvals, and rules as to when a third party such as a Supplier or industry/professional organization may pay some or all of the expenses of a HealthTrust Attendee for such an Event.</p> <p>This policy does not apply to ordinary business meetings with Suppliers, demonstrations, facility tours, etc., or meetings relating to a potential or existing contract or one up for renewal. For rules on payment of those expenses, see Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others.</p> <p>This policy applies to all HealthTrust employees. It applies to Advisory Board members and independent contractors only if they are attending an Event at HealthTrust’s request and expense.</p> <p><u>Approvals.</u> See policy 1 below for approvals that must be obtained in order to attend an Event.</p> <p><u>Payment of expenses for Events.</u></p> <ul style="list-style-type: none"> • <u>Speaker, Faculty, Advisor.</u> If a HealthTrust Attendee is speaking to an audience at an Event or serves on an advisory board for an Event or a professional association, the Event organizer or association may pay for his or her registration, food and beverages, travel/lodging for the Event and/or meeting, but the Attendee may not accept any honorarium, speaker’s fee or other compensation. • <u>Expenses paid for all.</u> The offer of a Supplier or an industry/professional organization to provide free or reduced fees for a HealthTrust Attendee for Event expenses (other than travel expenses) may be accepted and is not considered a Business Courtesy <u>only if</u>: <ul style="list-style-type: none"> (A) no fee is charged to any attendee; or (B) 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 all attendees.

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- Expenses paid for some. The offer of a Supplier or an industry/professional organization to provide free or reduced fees for a HealthTrust Attendee for Event expenses, which offer is not available to all attendees, may be accepted (except for an offer to pay travel costs) but is considered a Business Courtesy, subject to the value limits and reporting requirements of [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#). If a Supplier sponsors a function solely or primarily for an Advisory Board as a group, they may attend if it does not occur during the Quiet Period.
- Special rules for travel expenses (transportation, lodging or other travel expenses).
 - A Supplier’s offer to pay travel expenses may not be accepted, unless there are extenuating circumstances and the CEO or COO provides prior written approval.
 - An industry or professional association’s offer to pay such expenses may be accepted if the CEO or COO provides prior written approval.
 - As noted above, an Event organizer’s offer to pay such expenses for speakers and advisors relating to the Event may be accepted.

POLICY

1. This policy applies to larger Supplier Events and Industry/Professional Events that involve many participants in addition to HealthTrust Colleagues. It does not apply to ordinary business meetings with Suppliers, training or product demonstrations, customer review/input meetings or panel discussions, meetings relating to a contract and the like. For rules as to payment of expenses for such events, see [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#), policy 3(c).
2. This policy applies to all HealthTrust employees. It applies to other HealthTrust Colleagues (Advisory Board members and independent contractors) only if they are HealthTrust Attendees at such an Event, meaning they are attending at HealthTrust’s request and expense. These other Colleagues should abide by their own organizations’ policies with respect to these matters, if those policies are stricter than this policy.

PROCEDURE

1. Approvals. HealthTrust Attendees may attend an Event if all applicable approvals listed in the paragraph below are obtained. HealthTrust managers may approve attendance by HealthTrust Attendees only if the business and educational components predominate over all other activities taken together.

A HealthTrust Employee must obtain the prior written/email approval of his or her manager. An Advisory Board member must receive a written invitation from the Advisory Board lead to attend as a HealthTrust Attendee, and the Advisory Board lead must obtain the prior written approval of his or her manager. An independent contractor must receive a written invitation from his or her HealthTrust manager to attend as

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a HealthTrust Attendee, and the manager must obtain the prior written approval of his or her manager.

2. Payment of expenses for Events. HealthTrust must pay all expenses relating to a Colleague's attendance at an Event, except as provided below:

(a) Exception for speaker, faculty, advisor. If a HealthTrust Attendee is a presenter, speaker, panelist or faculty member who is speaking to an audience at an Event, or serves on an advisory board related to the Event or its organizers or a professional association, the organizers of the Event or the association may pay all or a portion of the registration fees, travel, lodging, food and beverage, and entertainment expenses of such person relating to the Event or a related meeting, but no honorarium, speaker's fee or other compensation may be accepted by any HealthTrust Attendee. In accordance with HT.003 - *Conflict of Interest*, no HealthTrust Colleague may speak on behalf of, or represent, any Supplier.

(b) Registration fees, food and beverages, entertainment.

(i) Expenses paid for all. If a Supplier or an industry/professional organization offers a HealthTrust Colleague free or reduced registration fees; and/or offers to pay for or sponsors food, beverages and/or entertainment during the entire Event or for a specific activity that appears on the Event agenda, the offer may be accepted by a HealthTrust Attendee only if (A) no fee is charged to any attendee; or (B) 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 all attendees.

(ii) Expenses paid for some; Business Courtesy. If a Supplier or an industry/professional organization offers a HealthTrust Colleague free or reduced registration fees, and/or offers to pay for or sponsors food, beverages and/or entertainment in connection with an Event, the offer is considered a Business Courtesy if it is not made to all attendees. As such, it is subject to [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#), including the value limitations, reporting requirements, and restrictions against receiving Business Courtesies during the Quiet Period. A HealthTrust Colleague may accept if approvals per Procedure 1 have been obtained, and if acceptance will not cause him or her to exceed the dollar limit of Business Courtesies that may be accepted from the entity offering to pay those expenses. (Note that acceptance of funds for travel is restricted under the Business Courtesies policy.)

If, in connection with an Event, a Supplier sponsors a function that is offered solely or primarily to an Advisory Board as a group, the Advisory Board may accept if the function does not occur during the Quiet Period for that Supplier.

(c) Travel expenses (transportation, lodging or other travel expenses). Except as provided in Procedure 2(a) above as to Event speakers, faculty and advisors:



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- (i) A Supplier’s offer to pay, in whole or in part, travel expenses of a HealthTrust Attendee for an Event is a Business Courtesy governed under [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#), policy 3(c), and may be accepted only in compliance with that policy. (A Supplier’s offer to pay such expenses will generally not be approved, absent exceptional circumstances.)
 - (ii) An industry/professional association’s offer to pay, in whole or in part, travel expenses of a HealthTrust Attendee for an Event may be accepted with the prior written approval of the CEO or COO, copy to the ECO.
 - (d) Scholarships. An industry/professional association’s offer to pay some or all expenses of a HealthTrust Colleague’s attendance at an Industry/Professional Event under a scholarship or similar program may be accepted if the association’s criteria for the award are publicly available, the Colleague meets the criteria, and the program is funded by the association’s funds rather than one or more Suppliers. HealthTrust employees must also obtain prior written approval of the CEO or COO, copy to the ECO.
- The ECO is responsible for overseeing the implementation of this Policy. For questions, please contact Lynn Egan at 615-344-3947, Lynn.Egan@HealthTrustpg.com.

DEFINITIONS

Advisory Board means the HealthTrust equity advisory committee, and any other advisory board or committee established by HealthTrust, including without limitation HTE’s evaluation panels, consisting of regular and associate advisory board participants who are representatives of Members or Clients.

CEO means the Chief Executive Officer of HealthTrust LP.

CEU means a Continuing Educational Unit, including clinical, medical, legal or other educational units or hours.

Client means a customer or client of HealthTrust that is not a Member, and that receives fee-based consulting services (and in some cases custom contracting services) offered by HealthTrust under one of the following programs: EnergyTrust, ServiceTrust, SolutionsTrust and SourceTrust; or other programs offered by HealthTrust from time to time.

COO means the Chief Operating Officer of HealthTrust LP.

ECO means the Ethics and Compliance Officer of HealthTrust LP reporting directly to the CEO.

Event means a large Industry/Professional Event or a Supplier Event that is not limited to HealthTrust Colleague participants, and that is not underwritten or sponsored by HealthTrust.

HealthTrust Attendee means a HealthTrust employee or Advisory Board member who is attending an Event at

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HealthTrust's request and expense.

HealthTrust Colleagues or Colleagues means:

- (a) any individual who works full- or part-time for HealthTrust including
 - (i) employees of HealthTrust,
 - (ii) employees of HCA Management Services, L.P. who work for HealthTrust under a management contract,
 - (iii) employees of China International Intellectech (Shanghai) Corporation who are dispatched to work for the Shanghai Office, or
 - (iv) independent contractors providing services to HealthTrust; and
- (b) a Member or Client representative who participates on an Advisory Board as a regular or associate participant.

Industry/Professional Event means an event that is not limited to HealthTrust Colleague participants, and that is planned, presented, sponsored and hosted by an industry and/or professional association rather than by Suppliers (although Suppliers may sponsor functions such as a meal, or purchase exhibition space). It includes educational sessions that may be accredited by a professional association, with CEUs offered. Examples include the AHRM annual conference of the Association for Healthcare Resource and Materials Management, a not-for-profit association; and the AORN Surgical Conference and Expo of the Association of periOperative Registered Nurses, a non-profit association.

Member means an entity that has become a member of HealthTrust by signing a participation agreement with HealthTrust under which the entity participates in a group purchasing program offered by HealthTrust.

Quiet Period means the time beginning with issuance of an RFP (Invitation to Tender or ITT at HTE) and ending with the award or renewal of a contract to a Supplier who has responded to the RFP or ITT.

Supplier means any individual or entity that has, or seeks to have, a contract with HealthTrust, as a vendor, consultant, distributor, landlord or in any other capacity; but excluding Members and Clients, independent contractors and those under employment contracts with HealthTrust.

Supplier Event means an event that is not limited to HealthTrust Colleague participants, and that is planned, presented, sponsored and hosted by one or more Suppliers (other than an Industry/Professional Event), such as a Supplier educational event or seminar, that covers topics in addition to Supplier products or services, or a forum that convenes professionals to discuss current trends, etc. Examples include the Caremark Client Forum, or GE's "Centricity Live" Connect meeting for users of GE's medical records system.

REFERENCES

- [HealthTrust Code of Conduct](#)
- [HealthTrust Supplier Business Relationship Statement](#)
- [Policy HT.003 – Conflict of Interest](#)
- [Policy HT.004 – HealthTrust Events](#)
- [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#)
- Rules Relating to Certain Marketing Activities (conferences, raffles, games, giveaways, marketing surveys)*