



Policy	
Vendor Relationships	
Effective Date: 4/7/2026	Policy Owner: Compliance Office
Rescission: Supersedes policies: <ul style="list-style-type: none"> • CHL 10.5 • HA-10-26 Acceptance of Tips, Gifts & Gratuities – Patient, Visitor and Vendor, dated 08/17/2018 • Marlborough Hospital policy Vendor and Manufacturer Representatives, dated 11/25/2025 • UMMMC policy 1143 Vendor Relationships, dated 03/23/2017 	Approved by: Rick King, Vice President and Chief Compliance Officer, UMMH Approved by: Eric Dickson MD, CEO UMass Memorial Health
Applicability: All Workforce Members of UMass Memorial Health	
Keywords: Vendor, Conflict of Interest, Vendormate, Gifts, Gratuities, Speaker, Consulting, Free, Travel, Training, Conference	

Policy

UMass Memorial Health (UMMH) limits the receipt of items and services from Vendors to UMMH and its workforce members, and establishes oversight of financial and other relationships between Workforce Members and Vendors as more fully described below. This policy is designed to supplement the UMMH [Conflict of Interest \(umassmemorialhub.org\)](http://umassmemorialhub.org) policy.

UMMH seeks to ensure that *all* of our decisions whether, clinical, business-related or otherwise, are based on the integrity of our professional judgments and are not tainted in any way by the nature of UMMH’s or our Workforce Members’ relationships with outside parties. This policy does not seek to inhibit true scientific, independent and objective research or collaboration, or to prohibit relationships with Vendors in support of these objectives. This policy establishes criteria to ensure the above objectives are met and that our decision making is independent from Vendor influence.

In general, no free items or services, gifts, food, sponsorship, or anything of value of any kind may be accepted from any Vendor by UMMH or any Workforce Member unless it meets a specific exception listed below or is otherwise approved by the Vendor Relationships taskforce.

Dually employed individuals (and departments) when acting in any capacity representing their employer(s) or entity(ies), including, but not limited to individuals employed by University of Massachusetts Chan Medical School (UMass Chan), must follow the policies of their other employer/entity, whichever is more restrictive.

Definitions

Clinical Personnel – All UMMH Workforce Members who are directly or indirectly involved in the provision of patient care, regardless of the capacity in which the care is delivered (i.e., clinical or clinical research) or the location in which the care is delivered (e.g., UMMH Hospital, UMMH Physician Office, other UMMH entity location, including joint venture locations). This includes but is not limited to, physicians, resident/fellows, advanced practice providers, associate health professional staff, nurses and technicians. This definition also includes private physicians, advanced practice providers, and associate health professional staff when acting in any capacity representing UMMH, including but not limited to, as members of a UMMH committee, when providing administrative services to a UMMH entity, or when they are interacting with a Vendor at a UMMH site (which does not include a private office leased at a UMMH location) or related to services provided at a UMMH site.

Continuing Education (CE) – education that helps Workforce Members to maintain competence and learn about new and developing areas of their field.

Gifts – Anything of value – regardless of amount – and includes, but is not limited to pens, pads, stethoscopes, journals, textbooks, meals, entertainment or other hospitality provided at any time or location (including individual or group meals and meals sponsored by Vendors) and tickets to sporting or other events.

Sales and Marketing – Activities by a Vendor that include advertising, promotion, or other activity targeted at UMMH Workforce Members that is intended to be used or is used to influence sales or the market share of a product; to influence or evaluate the prescribing behavior of a provider; to market a product; or to evaluate the effectiveness of a product sales force. Sales and marketing activities also include any product education, training, or research project that is designed or sponsored by the marketing division of a Vendor or has marketing, product promotion, or advertising as its purpose.

Speaker's Bureau – A speaking engagement typically solicited by pharmaceutical, biotechnology, and/or medical device Vendors for the purpose of disseminating Vendor-generated presentation materials or promoting Vendor products in exchange for a form of remuneration.

Technical Training – Training provided by a) a Vendor so that UMMH Workforce Members may appropriately use a Vendor's product, or b) professional services firms such as consultants and law firms regarding industry best practices and requirements. The primary purpose of the Technical Training content must not be Sales and Marketing.

Vendor – Any entity providing or actively seeking to provide services or supplies of any kind (both clinical and non-clinical) to UMMH, or to which UMMH refers patients. This includes, but is not limited to, pharmaceutical manufacturers; biotechnology, medical device, and hospital equipment supply companies; ambulance companies, and providers to whom UMMH refers patients, such as physician offices, other outpatient service providers, skilled nursing facilities, long term care facilities, and inpatient rehabilitation facilities. This includes all representatives of such entities. When Workforce Members provide consulting or other services, the term "Vendor" also includes all for-profit organizations for which one or more primary lines of business is healthcare related, even if such entities are not currently or actively seeking to provide services or supplies to UMMH. For example, the restrictions on Workforce Member consulting would apply to a pharmaceutical manufacturer even if it did not sell drugs to UMMH, but would not apply to an airline or accounting firm if they were not otherwise "Vendors." A third-party entity or individual who has been engaged by a UMass Memorial entity to provide a service, and as such has become a Workforce Member (see the definition below), would not be considered a Vendor for minor workforce interactions. For example, a private physician who is paid to be a medical director or an employee who is permanently assigned to UMass Memorial by a Vendor with whom UMass Memorial has contracted for services, can participate in and contribute to a modest department lunch in their capacity as a Workforce Member, similar to the participation and contribution of other Workforce Members in

similar roles. Entities in which UMMH holds an equity interest, including joint ventures, are Vendors if they meet the criteria above. UMMH entities in which UMass Memorial Health Care, Inc. or a subsidiary are the sole corporate member are not Vendors.

Workforce Member – All employees, contingent workers, volunteers, trainees (including medical students, interns, residents, allied health professionals and business students), members of the medical staff including employed and private physicians, nurses in expanded roles, physician assistants, temporary employees, and other persons employed, credentialed or under the control of UMMH whether or not they are paid by UMMH. For purposes of this policy, private physicians, advanced practice providers, and associate health professional staff are Workforce Members when acting in any capacity representing UMMH, including but not limited to, as members of a UMMH committee, when providing administrative services to a UMMH entity, or when they are interacting with a Vendor at a UMMH site (which does not include a private office leased at a UMMH location) or related to services provided at a UMMH site.

Required Criteria for Procedure

- A. Gifts** – Workforce Members are prohibited from accepting Gifts of any kind from any Vendor unless otherwise permitted by this policy.
- B. Prohibition of Food** – Vendors are not permitted to pay for or provide food at any UMMH location, except as permitted below.
- C. Prohibition of Meals** – Vendors are not permitted to provide meals to Workforce Members. The only exceptions are:
1. Meals provided as part of UMMH sponsored Continuing Education (CE) events funded by Vendors. Funds provided by Vendors for CE events, and processed through the UMMH Office of Philanthropy consistent with Section D below, may be used to support the reasonable and appropriate costs of the CE event, including food.
 2. Meals provided as part of international, national or regional CE events through the hosting program (such as when a Vendor “sponsors” a meal of the conference for all conference attendees).
 3. Meals provided directly by a Vendor in connection with informational or educational meetings or presentations for the purpose of educating and informing health care practitioners about the benefits, risks and appropriate uses of prescription drugs or medical devices, disease states or other scientific information.
 - Such meals must:
 - Occur in a venue and manner conducive to informational communication
 - Not exceed in value:
 - \$30 per person if provided in UMMH locations, or
 - The amount permitted under the [UMMH Travel and Expense Reimbursement Guidelines](#) for non-business travel meals if provided outside of a UMMH location.
 - Be subordinate in time and focus to the educational purpose of the event.
 - Such meals must not:
 - Include the promotion of off-label uses of prescription drugs or medical devices
 - Be attended by a UMMH Workforce Member with the same Vendor more than four times per year
 - Include guests of the UMMH Workforce Member (such as a spouse or other family member, unless such person is attending in their own right as permitted under this policy or that of their employer if separately employed).

Meals provided by Vendors that exceed the limits of this section must be reviewed and approved in advance by emailing the Vendor Relationships Task Force at VendorRelationshipsTaskForce@umassmemorial.org.

4. Meals or modest refreshments served by a Vendor during a business meeting while on the Vendor premises or contracted meeting space (which may be a restaurant location conducive to a business meeting). For example, a Vendor may serve coffee or water during a business meeting, and may provide modest food during a meeting which spans a mealtime. Vendors may **not** provide meals or modest refreshments at locations outside of their premises or contracted meeting space, for instance, at a restaurant at the *conclusion* of a business meeting or to celebrate a transaction, unless otherwise permitted by this policy or approved by the Vendor Relationships Task Force by emailing the Vendor Relationships Task Force at VendorRelationshipsTaskForce@umassmemorial.org.

D. Support for Continuing Education – All Continuing Education events hosted or sponsored by UMMH must comply with the requirements below.

- **ACCME Standards** – All CE events, including Continuing Medical Education (CME) and Graduate Medical Education (GME) must comply with the ACCME [Standards for Integrity and Independence in Accredited Continuing Education](#) whether or not CE credit is awarded.
- **UMMH Office of Philanthropy** – All funding from Vendors to support CE programs must be directed through the UMMH Office of Philanthropy.
 - Vendor support must comply with the [Gift Acceptance \(umassmemorialhub.org\)](#) policy and the [Guidelines for Stewardship of Philanthropic Funds](#), including a written gift agreement through the UMMH Office of Philanthropy and maintenance of the funds in a donor restricted fund overseen by the department chair.
 - Funding may be restricted to a clinical department and if so, must be overseen by the Department Chair. Funding may not be restricted to a clinical division, a specific program or an individual.
 - UMMH may acknowledge support of a Vendor for CE, however, such acknowledgement may not include any marketing produced by or for the sponsoring Vendor, including corporate or product logos, trade names, or product group messages on any materials.
- **Food or Other Items** – Vendors are not permitted to bring or pay for food or provide to attendees other non-educational tangible items at sponsored CE events (other than food or items funded through the Office of Philanthropy).
- **Display of Products** – Vendor sponsors or attendees of CE programs may display products on UMMH premises only if they are directly related to the educational purpose of the CE event, and consistent with ACCME standards, such displays must not occur in the educational space within 30 minutes before or after an accredited education activity.
- Activities that are part of the event but are not accredited for continuing education must be clearly labeled and communicated as such.

E. UMMH Sponsored Meetings – International, national, and regional meetings sponsored by UMMH designed to benefit the broader community of physicians and other clinicians and patients, as well as UMMH Workforce Members (Sponsored Meetings) are permissible. Such meetings may or may not also be CE events, however, if the Sponsored Meeting is a CE event, the more stringent CE requirements above must be followed.

- **UMMH Office of Philanthropy** – All funding from Vendors to support Sponsored Meetings must be directed through the UMMH Office of Philanthropy.
 - Vendor support must comply with the [Gift Acceptance \(umassmemorialhub.org\)](#) policy and the [Guidelines for Stewardship of Philanthropic Funds](#), including a written gift agreement through the UMMH Office of Philanthropy and maintenance of the funds in a donor restricted fund overseen by the department chair.
 - Funding must be used exclusively for support of such meetings and not otherwise directly benefit UMMH. For recurring Sponsored Meetings funds may roll over from one occurrence to another.

- UMMH may acknowledge support of a Vendor for a Sponsored Meeting in meeting materials.
 - **Food or Other Items** – Vendors are not permitted to bring food, or provide to attendees other non-educational tangible items at Sponsored Meetings (other than food or items funded through the Office of Philanthropy).
 - **Display of Products** – Vendor sponsors or attendees of Sponsored Meetings may display products on UMMH premises only if they are directly related to the educational purpose of the Sponsored Meeting and similarly qualified Vendors of similar products are given equal access to display their products.
- F. Vendor Product Fairs** – Vendor Product Fairs are generally prohibited. Vendors are not permitted to display or market products on any UMMH premises, unless they are directly related to a UMMH sponsored CE event or Sponsored Meeting (see above) or with UMMH entity management approval at a Vice President level or above, and similarly qualified Vendors of similar products are given equal access to display their products.
- G. Support for Scholarships and other Trainee Activities** – Vendors may not provide support to pay for travel, lodging, honoraria, or personal expenses for individual learners or groups of learners for Vendor-provided CE. Vendor support for non-Vendor-provided CE scholarships or trainee activities or discretionary funds to support trainee or resident travel or non-research funding support may be accepted provided that all of the following conditions are met:
- Vendor support must comply with the [Gift Acceptance \(umassmemorialhub.org\)](https://umassmemorialhub.org) policy and the [Guidelines for Stewardship of Philanthropic Funds](https://umassmemorialhub.org), including a written gift agreement through the UMMH Office of Philanthropy and maintenance of the funds in a donor restricted fund overseen by the department chair.
 - Selection of recipients must be within the sole discretion of the department chair, or in the case of graduate medical education, the Senior Associate Dean for Graduate Medical Education and Clinical Affairs.
 - All activities for which Vendor support is used should have legitimate educational merit and associated expenses should be reasonable and consistent with [Travel and Expense \(umassmemorialhub.org\)](https://umassmemorialhub.org) policy and [Travel and Expense Reimbursement Guidelines \(umassmemorialhub.org\)](https://umassmemorialhub.org).
- H. Technical Training provided by Vendors** – A Workforce Member may attend Technical Training from a Vendor if such training is provided for in an existing UMMH contract with the Vendor or, in the absence of such provision in a contract, a Department Chair or Vice President determines the training to be necessary and appropriate. When provided for in a contract or otherwise approved, Vendors may pay for or reimburse travel, lodging and meals specific to the training. Meals that take place in connection with the training at a location that is not the training site may be provided consistent with amounts permitted under the UMMH [Travel and Expense Reimbursement Guidelines \(umassmemorialhub.org\)](https://umassmemorialhub.org) while the training is ongoing. For instance, if the Vendor would otherwise reimburse the dinner expense of the UMMH Workforce Member, the UMMH Workforce Member may participate in a dinner hosted by the Vendor.
- I. Vendor Education Materials and/or Continuing Education Credits** – UMMH and Workforce Members may accept Vendor supplied educational materials and/or continuing education units (CEUs), continuing professional education (CPEs) or other similar training credits for training that is provided or sponsored by a Vendor only to the extent that:
- The CEUs/CPEs are granted in accordance with the standards of an independent third-party organization.
 - The training provided by the Vendor does not contain marketing materials.
 - Similar training is not available at a reasonable cost from a non-vendor source.
 - The responsible Department Chair or Vice President approves the training.

- J. Support for Clinical Fellowships** –UMMH Clinical Departments may not accept Vendor funding for fellowship programs.¹
- K. Consulting or Service Agreements** – Consulting arrangements that pay Workforce Members an amount that is not commensurate with services provided (either because the compensation exceeds fair market value or because no or minimal services are needed or provided) are considered gifts and are prohibited. All consulting agreements must be of a scientific, clinical or educational nature, such as those directly involved in the development, testing, safety assessment, or application of a product or process, or the training, education or proctoring of providers. Consulting agreements must meet the following requirements:
- **Prohibited Services** – Workforce Members may not provide consulting services to Vendors for the following activities:
 - Marketing – all aspects, including analysis, strategy, and recruitment;
 - Sales – any aspects;
 - Advertising – all aspects, including serving as an expert speaker (see also Speakers’ Bureaus);
 - Investor relations – all aspects, including providing information on products to potential investors.
 - **Training, Education or Proctoring** – Workforce members who are paid by Vendors to train, educate or proctor clinicians must meet the following requirements:
 - The training content must be of a scientific or clinical nature, and not meet the definition of a Speaker’s Bureau.
 - Where the training content relates to a Vendor’s product or service the training content must be for the appropriate clinical use, diagnosis, medical necessity or clinical documentation related to the product or service, and must not consist of Sales and Marketing.
 - The Vendor may not have the contractual right to control/approve the content of materials or what is said, with the exception of:
 - Audiences that include only individuals who are employed or under contract to provide services to the Vendor, or
 - For audiences that include individuals not employed or under contract to provide services to the Vendor only when the Vendor’s review is for purposes of assuring that the content complies with applicable laws and regulations, Vendor policies and procedures, and clinical safety standards.
 - Reviews for the purpose of obtaining independent third-party Continuing Education credits.
 - Training that is provided onsite at UMMH entity must also comply with the [Observers of Patient Care Activities \(umassmemorialhub.org\)](#) policy.
 - **Contract** – Consulting must be supported by a written contract which clearly describes responsibilities and specific deliverables. The contract must specify compensation to be paid to the Workforce Member and be fair market value. All consulting agreements are required to be uploaded by the Workforce Member into their online UMMH/UMass Chan Conflict of Interest Disclosure Statement. Workforce Members who do not have an online Conflict of Interest account, or who need assistance accessing their account should reach out to their Compliance Officer for assistance.
 - **Compensation and Reimbursement**
 - All services must be performed on personal time unless the consulting income is paid to UMMH; and
 - Travel and expense reimbursement must be reasonable and necessary and consistent with the UMMH [Travel and Expense \(umassmemorialhub.org\)](#) policy for the provision of the above services.

¹ The UMass Chan Medical School GME Committee (GMEC) reviews clinical fellowships.

- L. Clinical and Research Speaking Arrangements/Speakers Bureaus** – UMMH endorses the use of lectures to disseminate knowledge evolving from clinical or research developments.
- **General** – These lectures should be based upon Clinical Personnel clinical, research, scientific or professional knowledge and should incorporate materials developed exclusively by the speaker with no Vendor input or requirement for approval other than as permitted in section K. above. Clinical Personnel must not participate in nor accept compensation for any lecture not meeting these requirements.
 - **Speakers Bureaus** – UMMH views speakers bureaus sponsored by Vendors as an extension of the Sales and Marketing process. UMMH prohibits Clinical Personnel from participating in, or receiving compensation for, talks given through a speakers bureau. Private non-employed members of the medical staff may not use, refer to or allow use of their UMMH medical staff appointments in promotions or presentations related to any speakers bureau or other speaking engagement where a Vendor has the contractual right to control/approve the content of materials.
- M. Ghostwriting** – Workforce Members writing on behalf of UMMH, or using its name, are prohibited from publishing any articles written by Vendor employees, other than those who are co-authors based on their individual contributions to IRB approved research. Workforce Members are responsible for the content of any articles, papers or talks delivered or produced by them or with which their name is associated.
- N. Product and Service Procurement Committees** – a Workforce Member with a personal financial relationship with an outside company may be a member of, support staff to (including but not limited to a project manager), or an ad hoc presenter to, a UMMH Entity committee or subcommittee that reviews and approves drugs, devices, supplies, products, and services, such as committees related to pharmacy and therapeutics, supply chain, facilities or capital planning, biomedical engineering or information services (for purposes of this section, a “Committee”). However, Workforce Members may provide information to a Committee, but must recuse themselves from deliberations and votes regarding products or services of companies with which they have a personal financial relationship or of their competitors.

For purposes of this section, personal financial relationships include:

- Consulting or other contractual arrangements
- Clinical research sponsorship – where the Workforce Member is the Principal or Co-Principal Investigator
- Outside business arrangements including:
 - Direct business arrangements (joint venture or other support not described above)
 - Loans, leases/rental arrangements
 - Family relationships: Spouse, parents, children, siblings employed in management positions by the Vendor.

No individual may participate in any capacity as a member, support staff, or an ad hoc presenter to a Committee if they hold equity (other than through mutual funds or retirement accounts (unless the individual is directly involved in investment decisions)) in the company whose product or service is under consideration or is their direct competitor.

Ad hoc presenters to a Committee must disclose in applications submitted to the Committee potential conflicts of interest related to the Vendors or competitors to be discussed in the Committee meeting. Should the Committee not use an application process, prior to each meeting of a Committee, the Committee chair/lead will ask ad hoc presenters to disclose to the Committee chair/lead any potential conflicts of interest related to the Vendors or competitors to be discussed in the Committee.

All Committee members, support staff, and ad hoc presenters must complete an annual on-line [Conflict of Interest \(COI\) Disclosure Form](#).

- O. Drug Samples** – Drug samples may be accepted only if they meet the criteria set forth within a UMMH hospital entity’s Use of Sample Medications policy.
- These requirements do not apply to UMass Memorial Medical Group physician office-based locations operating outside of the hospital entities.
- P. Vendor Assistance with Patient Pre-Authorizations** – Vendors may provide information or guidance to UMMH caregivers regarding their products to assist UMMH to correctly complete and submit pre-authorization requests to patients’ insurance providers. However, Vendors may not perform the pre-authorization process on behalf of UMMH, unless a Vendor has a contract that has been approved through the UMMH contract management system to provide pre-authorization services, and is paid fair market value for the provision of the services.
- Q. Site Access by Sales and Marketing Representatives** –The presence of Vendor representative must be expressly requested and approved in advance by a Workforce Member. Vendor representatives must comply with the following requirements, as applicable:
- The representative is present to provide in-service training on devices and other equipment, including provision of essential guidance on the use of such equipment.
 - A device representative is certified by their employer to provide the requested device training.
 - Representatives should never scrub or provide direct patient care services at UMMH and, unless they are needed for a defined purpose during patient care, cannot be “Observers” under the [Observers of Patient Care Activities \(umassmemorialhub.org\)](http://umassmemorialhub.org) policy.
 - Representatives are permitted in non-patient care areas by scheduled appointment only. Representatives should not be in any UMMH facility without a scheduled appointment with a Workforce Member;
 - All Vendors as defined by the [Health Clearance Requirements for Vendors \(umassmemorialhub.org\)](http://umassmemorialhub.org) policy must register in Vendormate (the UMMH web-based tool), and when presenting onsite must sign in and generate a one-day badge to be worn visibly while onsite. Vendors may use this link to register with Vendormate: [Vendor Registration \(ghx.com\)](http://ghx.com).
 1. If specifically approved by a senior vice president, a Vendor representative may be given a UMMH “hard” badge. If a senior vice president authorizes a “hard” badge, they are responsible to ensure all appropriate Vendor registration information is obtained (consistent with, but outside, the Vendormate on-line tool) and that the Vendor representative has received and formally acknowledged an understanding and agreement to comply with UMMH policies;
 - Vendors providing products or services for which UMMH is acting as a reference site (including any potential customer of such Vendor) are subject to all of the above requirements of this section when they come on site to a UMMH location. In addition, there must be a written agreement between UMMH and the Vendor that includes the terms and conditions of UMMH acting as a reference site, and the agreement must comply with UMMH policies applicable to the purchase of goods and services.
- R. Joint Marketing Agreements** – Joint Marketing Agreements between a Vendor and UMMH entity must be approved by Marketing and Communications and the UMMH entity Chief Compliance Officer. All such agreements must be documented in a contract that has been approved through the UMMH contract management system.
- S. Fundraising – Solicitations of Vendors**
- **Workforce Member Involvement** – Fundraising solicitations made by UMMH to our Vendors is acceptable provided this is coordinated and overseen by the Office of Philanthropy. If as part of such efforts the Office of Philanthropy determines the need for Workforce Member presence, such as that of a senior leader or physician, or presentations on UMMH clinical programs, either is acceptable.
 - **Fundraising Solicitations During Contracting Processes** – It is imperative that there be no “quid pro quo” between fundraising efforts involving our Vendors and our purchasing

decisions. Fundraising solicitations involving Vendors should be entirely separated from and not contemporaneous with Vendor contracting processes. It is the responsibility of the Office of Philanthropy and Supply Chain Services to ensure effective communication regarding the timing of fundraising and contracting processes and related Vendors to ensure appropriate separation of these activities both in fact and appearance. The Office of Philanthropy and Supply Chain Services should ensure Vendors are clearly apprised that charitable gifts to UMMH do not in any way implicate UMMH purchasing decisions.

- T. Reporting** – Workforce Members are required to disclose all of their outside relationships with Vendors in their annual Conflicts of Interest Disclosure Form.
- U. Vendor Endorsements** – UMMH occasionally receives requests from Vendors for endorsements or reviews by UMMH.
- Workforce Members may provide factual statements about how UMMH uses a Vendor’s product and related outcomes, but must not endorse a product or vendor, or use superlatives. For example: “UMMH uses Acme Widgets’ product and it has reduced patient complications by 10%” is acceptable, while “UMMH uses Acme Widgets’ product and it is the best patient care tool we have ever used!” is not acceptable.
 - Vendors may pay for the travel, meals and lodging expenses incurred by a Workforce Member in relation to a Workforce Member providing an endorsement at a conference or that otherwise requires travel. Such reimbursement may not be in excess of amounts permitted under the UMMH [Travel and Expense Reimbursement Guidelines \(umassmemorialhub.org\)](https://umassmemorialhub.org).
 - When providing an endorsement, Workforce Members must provide a statement that includes content, as applicable, similar to:
 - [Vendor] has neither reviewed, influenced nor approved my content other than as required for regulatory compliance.
 - [Vendor] has not paid me or UMass Memorial for my [testimonial/presentation/participation, etc.].
 - [Vendor] has reimbursed my expenses related to my [testimonial/presentation/participation, etc.].
- V. Enforcement** – Department chairs and senior managers are expected to enforce this policy with the support of the Compliance Office. Alleged violations of this policy should be reported and will be investigated consistent with the [Reporting Compliance Matters and Investigations of Internal Compliance Complaints \(umassmemorialhub.org\)](https://umassmemorialhub.org) policy. Corrective actions and discipline for non-compliance will occur consistent with the [Performance Management/Discipline \(umassmemorialhub.org\)](https://umassmemorialhub.org) policy. Vendors who violate this policy will be subject to corrective action, such as removal of individual representatives from UMMH or termination of the relationship with the Vendor.
- W. Vendor Relationships Task Force** – A Vendor Relationships Task Force of UMMH leaders will function in an advisory capacity regarding the revision, implementation and oversight of this policy and will review and approve exceptions to this policy.
- X. Provision of Gifts and Items of Value to Referral Sources and Patients** – In general, UMMH will not provide gifts, remuneration or items of value to its clients if this policy would prohibit UMMH from accepting them under this policy. Gifts, remuneration or items of value with practitioners and other referral recipients or referral sources are more fully addressed in the [Financial Arrangements with Practitioners and Other Referral Sources](https://umassmemorialhub.org) policy. UMMH is not considered a “Vendor” to patients under this policy and gifts to patients are addressed under the [Gifts to Patients](https://umassmemorialhub.org) policy.

Entity/Departmental Procedure (if indicated)

[Pharmaceutical Representatives \(HA/C\)](#)

Pharmaceutical Representatives (UMMMC)

Supplemental Materials

N/A

References

[New Products Selection Conflict of Interest Attestation Form \(umassmemorialhub.org\)](http://umassmemorialhub.org)

Stark law ([42 U.S.C. Section 1395nn](#))

Anti-Kickback Statute ([42 U.S.C. Section 1320a-7b](#))

UMMH [Conflict of Interest](#) policy

ACCME [Standards for Integrity and Independence in Accredited Continuing Education](#)

[105 CMR 970. Pharmaceutical and Medical Device Manufacturer Conduct](#)