

West Penn Allegheny Health System  
Pittsburgh, PA

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General Policy Manual

Policy No.: \_\_\_\_\_ Page: 1 of 1

Date of Review: June 17, 2008

Original Date: June 8, 2001

Prior Reviews: June 11, 2007; March 31, 2006 & February 3, 2004

Approved: Robert R. Michalski

Subject: **Vendor-Promotional  
Training**

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EFFECTIVE DATE: June 8, 2001

**PURPOSE:** To establish the parameters surrounding acceptance of vendor-promotional training.

**POLICY:** “Vendor-promotional training” is defined as training or education provided by any person for the purpose of promoting its products or services, including vendor-sponsored seminars. It does **not** include training provided under a contract with West Penn Allegheny Health System (WPAHS) or its subsidiaries or by a contractor to facilitate use of products or services it furnishes under an existing contract with WPAHS or its subsidiaries. Such contractual training is permitted under the terms of the contract and with prior approval of the employee’s supervisor.

Vendor-promotional training, including travel and lodging, may be accepted when the business value to our organization outweighs any recreational or entertainment value of the training event, provided that the appropriate approvals are obtained in advance.

**PROCEDURE:** An employee who receives an invitation to attend vendor-promotional training, which may include travel, lodging or modest entertainment expenses must obtain the approval of the Vice President responsible for his/her department or higher supervising administrator when appropriate.

The Vice President/Administrator will make 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 Vice President with sufficient information (such as a course description and/or the letter of invitation) for the Vice President to assess whether the substantive content predominates over the non-substantive content. If the Vice President determines that attendance is preferred despite the entertainment portion predominating over substantive, the Vice President, System Compliance must be consulted to also receive the advance approval of the System Compliance Executive Committee.

If attendance at a vendor-promotional event involves travel outside the continental United States or lodging in excess of two nights, the employee must receive approval from the System Compliance Executive Committee prior to accepting the invitation.