

**Adm. Policy No: 1.31**  
**Effective Date: September 2003**

**SUBJECT:** Vendor Philanthropy  
Donations from Vendors

**SPONSOR:** Office of Institutional Advancement (Foundation)

**POLICY:** It is the policy of Heritage Valley Health System and its Foundations (Heritage Valley Beaver Foundation and Heritage Valley Sewickley Foundation) to enter into all business relationships with vendors in an ethical manner with regard to receiving donations by the foundations from vendors. The policy relates to Heritage Valley Health System administrative policies Adm.1.19, Adm.1.22, and Adm.1.26.

**PURPOSE:** The Office of Institutional Advancement is the general clearinghouse for all fundraising activities throughout the system and among its auxiliary organizations. Therefore, to ensure that solicitation efforts are carried out in a professional manner and not duplicative or contrary to the mission of Heritage Valley Health System and compliant with ethical matters, all plans for solicitation must be approved by the Office of Institutional Advancement.

**SCOPE:** This policy pertains to all areas of Heritage Valley Health System.

**DEFINITION:** Not applicable.

**GUIDELINES:** In accepting gifts, the Office of Institutional Advancement shall observe the guidelines recommended by the American Institute of Certified Public Accountants (AICPA), Department of Health and Human Services Office of Inspector General, Department of Justice, Heritage Valley Health System Corporate Compliance Program (CCP), and comply fully with generally accepted accounting principles (GAAP). Unusual gifts, gifts that have conditions attached, or gifts that require Heritage Valley Health System to assume an additional or specific liability will be reviewed by the President/CEO and Board of Directors.

**PROCEDURE:**

1. The Office of Institutional Advancement is responsible for soliciting, receiving, and acknowledging gifts by vendors, including sponsorship of Heritage Valley Health System events.
  - a. Philanthropic contributions will not influence purchasing decisions.

- b. Vendors may be invited to give philanthropically in support of Heritage Valley Health System events or projects, but are never required to do so.
  - c. A philanthropic gift by a vendor does not ensure the continuation of a business relationship with Heritage Valley Health System for any specified period of time, and does not guarantee new business.
  - d. Should a vendor choose not to support Heritage Valley Health System through their corporate giving program, its future business relationship will not be affected.
  - e. Any vendor gift known to be given with the intent of influencing purchasing decisions will be refused.
  - f. Vendors are encouraged to make contributions that are consistent with the funding priorities of Heritage Valley Health System.
2. Individuals with the authority to retain or approve contractual arrangements with a vendor may not participate in a Heritage Valley Health System event at the invitation of a vendor who is sponsoring the event.
  3. In a sincere attempt to build good business relationships and acknowledge vendor philanthropy, senior management, in coordination with the Office of Institutional Advancement, may assign designated employees and board members, who have no authority to retain or approve contractual arrangements with a particular vendor, to participate in an Heritage Valley Health System event with a vendor who is sponsoring the event.
  4. If a vendor approaches an employee for the purpose of making a philanthropic gift or offering participation in a Heritage Valley Health System, the employee must contact the Office of Institutional Advancement as soon as possible.

REFERENCES:

Administrative Policy 1.19, "Conflict of Interest", paragraph D

"Refrain from accepting a gift, gratuity, or favor from any person, firm, or corporation doing business or seeking to do business with Heritage Valley Health System under circumstances from which it reasonably could be inferred that the purpose of the gift, gratuity, or favor is to influence the director or employee in the conduct of transactions with the donor."

Administrative Policy 1.22, "Regulatory Compliance Code of Conduct", paragraph 7

"Personnel will not offer or accept any bribe. Personnel will not receive any gift of more than nominal value without management approval. For example, any gift given or accepted with the intent to induce referrals, purchase of services, or as a reward for referrals is not acceptable."

Administrative Policy 1.26, "Acceptance of Donations"

"The Office of Institutional Advancement is the general clearinghouse for all fundraising activities throughout the system and among its auxiliary

organizations. Therefore, to ensure that solicitation efforts are carried out in a professional manner and not duplicative or contrary to the mission of Heritage Valley Health System and its corporate compliance policy, all plans for solicitation must be approved by the Office of Institutional Advancement."

Approved: September 2003  
Reviewed: October 2005; September 2006; September 2007; September 2011;  
August 2012; August 2013; August 2014; August 2015  
Revised: August, 2009, August 2010

**SIGNATURE:**



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Norman F. Mitry  
President and CEO