

## ADMINISTRATIVE POLICY



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**SUBJECT: Vendor and Industry Relations Policy**

**POLICY:** Nationwide Children's Hospital, Inc. and all its affiliates, and each of its respective employees, physicians, trainees, volunteer staff and students (collectively, "NCH Workforce") shall interact with Vendors, in a manner that is compliant with applicable law, meets ethical standards, avoids, or minimizes conflicts of interest, and promotes fair and open dealings.

**PURPOSE:** To establish policy guidelines for interactions with Vendor) representatives for NCH Workforce.

**SCOPE:** This policy applies to all employees, physicians employed or contracted by NCH or one of its affiliated corporations, trainees, students and volunteer staff, and locations and corporations operated by or affiliated with Nationwide Children's Hospital (NCH). This policy also applies to individuals, including medical staff members, who are not employed by NCH or one of its affiliated corporations, but who work at a NCH facility or act on behalf of NCH.

All Vendors are expected to abide by this Policy with respect to their interactions with NCH Workforce or while at a NCH location, including not engaging or attempting to engage in any conduct that could cause NCH Workforce to violate this Policy.

### **SPECIAL INSTRUCTIONS:**

**1. Definitions**

**A. Vendor:** Vendor includes any of the following: (1) Any third party who has provided, is currently providing, or is seeking to provide goods, equipment and/or services to NCH; (2) a third party that is in a position to form a business relationship of any kind with NCH; (3) a third party that has no relationship to NCH but that may engage in a contractual relationship with a NCH Workforce member due to their professional expertise. Vendors may also be referred to as "Industry".

**B. Clinical Vendor:** Any Vendor who has provided, is currently providing, is seeking to (or reasonably may in the future) provide goods and/or services to NCH that are used

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in the delivery of patient care. Examples of Clinical Vendors include but are not limited to companies that supply pharmaceutical products, medical devices (i.e., implantables, infusion pumps), supplies (i.e., syringes, IV tubing) or clinical services (i.e., nursing agency).

- C. Vendor Representative:** Any employee or agent of a Vendor.
- D. NCH Workforce:** All employees, physicians, or contracted employees who perform services at or are employed by NCH or one of its controlled affiliated Corporations. NCH Workforce also means volunteers and trainees, including residents, fellows, interns, students, or other trainees performing services at or on behalf of NCH.
- E. On-Site:** On a premises owned, operated, or leased by NCH or one of its controlled affiliates, including any ambulatory clinics or urgent cares not located at NCH's main campus (i.e., Dublin, a close to home location).
- F. Consulting:** Providing services in one's personal capacity for or on behalf of a Vendor, and not as an employee or representative of NCH.
- G. Direct Marketing:** Marketing that overtly promotes a Vendor's product, service, or company.
- H. Indirect Marketing:** When referring to a Vendor's product, service, or company, marketing that may not be overtly promotional, but due to the details of the arrangement, circumstances, or event, may otherwise give the appearance of or give rise to promoting the vendor's product or service.
- I. Personal Gifts:** Gifts include cash in any form, cash equivalents such as gift certificates, property, or the use of something of value. Gifts can include goods, hospitality, services, travel and travel expenses, use of something of value such as a vacation home, tickets or admission to events or functions, including but not limited to sporting events, cultural events and social entertainment, payment of obligations, and any other item of value.

## 2. General Principles

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- A.** The selection of and conduct of business with a Vendor should be solely on the basis of appropriate business, medical, clinical and/or research criteria, as applicable, such as quality, cost effectiveness, and clinical efficacy. The selection and conduct of business should not be made on the basis of, or be influenced by, past, present or future gifts to or for the benefit of NCH Workforce, donations to NCH, support to NCH or NCH Staff such as clinical, research or educational support, or factors other than fair and open dealings based on appropriate business, medical, clinical and/or research criteria.
- B.** Certain Interactions with Vendor Representatives may not be prohibited by this Policy, but may be prohibited or curtailed by other agreements, policies or guidelines, including the [Conflict of Interest and Commitment Policy \(XII-11\)](#). Please contact the Office of Compliance and Integrity for further direction on activities not prohibited under this policy.
- C.** Vendor Representatives are not permitted at any NCH location without an appointment. The [Supplier Guidelines Policy \(IV-2\)](#) shall be utilized for further guidance.

### **3. Gifts, Entertainment, Charitable Contributions and Gratuities**

#### **A. Vendor Gifts, Entertainment and Gratuities to NCH Workforce Members**

Meals and other food items are addressed in a separate policy section ("Meals and Other Food Items").

##### **I. Clinical Vendor Representatives**

- a. Individual NCH Workforce members are prohibited from accepting any gifts from Clinical Vendor Representatives regardless of the value of the gift.
- b. NCH Workforce may not accept gifts or other items of value for listening to a sales talk by a Vendor Representative or for accessing Clinical Vendor Representative websites.
- c. Gifts do not include attendance at an event or function with a Clinical Vendor Representative where the expense of attending the event or

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function is borne by the NCH Workforce member personally or by NCH (where appropriate).

- d. NCH Workforce members shall not accept compensation, including payment or reimbursement of expenses, from Clinical Vendor Representatives simply for attending a CME or other educational activity or conference unless the person is speaking, teaching or otherwise engaged in a meaningful substantive role and the total compensation, including payment or reimbursement of expenses, is reasonable given the role.

### II. Non-clinical Vendor Representatives

- a. NCH Workforce are prohibited from accepting any gifts, entertainment, or other gratuities from non-clinical Vendor Representatives that have a business relationship with NCH unless such gifts, entertainment or other gratuities is specifically allowed pursuant to this policy.
- b. Gifts of cash may not be accepted regardless of value. Non-cash gifts may be accepted if valued at \$100 or less per person, and not more than \$500 for all NCH Workforce members combined; the non-cash gift is not intended to improperly influence behavior and it does not give rise to an appearance that the gift will influence behavior or decision-making processes. NCH Workforce are prohibited from accepting gifts during a Vendor selection process.
- c. Attendance at sporting events, cultural events and other reasonable business entertainment are acceptable as long as the events are reasonable valued at \$200 or less per person, or \$1000 for all NCH Workforce members combined, are not intended to improperly influence behavior, do not give rise to an appearance that such entertainment will influence behavior and will not influence any part of a decision-making process. NCH Workforce are prohibited from accepting gifts of entertainment during a Vendor selection process.
- d. Unsolicited gifts exceeding the above dollar amounts shall be reviewed with the Office of Compliance & Integrity prior to acceptance.
- e. The Conflict of Interest Policy should be consulted for further guidance.

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Except as otherwise stated elsewhere in the policy, NCH Workforce members may not solicit gifts or gratuities from Vendor Representatives.

Meals and other food items are addressed in a separate policy section.

### **B. Charitable Contributions and Gifts to NCH, its Affiliates or Departments**

- I. Offers of charitable contributions, gifts, or other financial support from Vendor Representatives will not be solicited or accepted as inducement to refer business from any NCH affiliate.
- II. Offers of charitable contributions, cash donations, gifts, or other financial support from Vendors Representatives may be accepted for support of the educational, clinical and research missions of NCH. All contributions will be coordinated through the Nationwide Children's Hospital Foundation (Foundation) as outlined in the Administrative Policy, [Solicitation and Distribution Policy](#). All sponsored projects will be coordinated by Grants Administration in accordance with professional, government, and other external standards and regulations. With the exception of solicitations by the Foundation or its agents, employees are strictly prohibited from soliciting gifts or gratuities from any person or company on behalf of NCH.
- III. Foundation employees who accept charitable contributions, gifts, or other financial support on behalf of NCH must facilitate and/or provide written receipts and/or acknowledgements to the Vendor Representative for all contributions, gifts or financial support accepted as required by applicable regulations. The Foundation will report quarterly to the Office of Compliance and Integrity any and all charitable contributions, gifts or other financial support exceeding \$100,000 in value from a single Vendor or from an individual who holds a fiduciary role at a Vendor company. The Chief Compliance Officer will provide the report to the Compliance Steering Committee for review.
- IV. These gifts must remain the property of NCH or its affiliates and should not be converted to individual ownership. For cash donations, these funds may be used to purchase items that will be used by NCH Workforce in relation to their professional duties or to compensate NCH Workforce for work done on behalf of NCH or its affiliates.

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**V.** NCH Workforce members who accept charitable contributions and gifts on behalf of NCH shall adhere to the following guidelines:

- a. No NCH Workforce member is authorized to accept a contribution, gift, entertainment, or financial support based on the volume or value of business between the Vendor Representative and NCH.
- b. All written contracts must be reviewed by Legal Services.
- c. The NCH Workforce member must inform each health care Vendor Representative orally and in writing that:
  - i. NCH has a written contribution policy that the Vendor Representative must sign and abide by if it makes a contribution or gift or provide financial support for a designated program or activity.
  - ii. The contribution, gift or financial support will not in any way influence NCH purchasing practices.
  - iii. NCH will accept only those contributions not dependent on doing business with the Vendor.
  - iv. NCH may accept sponsored projects, contributions, gifts, or financial support from all bona fide offers, including the Vendor's or competitors if they also make offers.
  - v. All major purchases by NCH are based on competitive bidding/negotiation/group contracting with products being screened by buyers who are not informed of the Vendor's contributions or financial support history.
  - vi. The Vendor Representative may not use the existence of a past contribution, gift, or financial support in order to influence NCH purchasing decisions.

- C.** All offers of free or reduced-price goods, if accepted, will be considered to be offers or bona fide discounts from the list or negotiated price of the goods, and the purchase order, invoice or other documentation must reflect the percentage discount and/or the discounted price calculated with the free or reduced-price items included.

#### **4. Meals and Other Food Items**

##### **A. On-Site**

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- I. Food and Meals from Clinical Vendors:** Clinical Vendors (and their Representatives) are prohibited from directly supplying or paying for meals, food, snacks, or other food items for NCH Workforce. Educational funding for activities which may include food must be coordinated through the appropriate education department.
- II.** Vendors, including caterers, whose main business is providing food to customers may provide food to NCH Workforce on campus for the sole purpose of NCH selecting food Vendors for the organization and/or its functions.
- III. Food and Meals from Non-clinical Vendors:** Staff should minimize accepting meals, food, or other food items from non-clinical Vendors. Occasional moderate meals are permitted, so long as the meals do not improperly influence the NCH Workforce Member's behavior. Discretion is advised.
- IV.** The Conflicts of Interest Policy should be consulted for further guidance.

### **B. Off-Site Vendor Meals**

- I.** NCH Workforce members are permitted to accept modest meals valued at less than \$50 per person in connection with a Vendor -sponsored event granting CME or other continuing education credit. Modest meals may be accepted at other educational or research events where the event is primarily dedicated, in both time and effort, to promoting objective scientific and educational activities and discourse and the main incentive for bringing the attendees together is to further their knowledge on the topic(s) being presented.
- II.** NCH Workforce are prohibited from participating, including speaking, in any off-site events sponsored by and paid for by a Vendor when the goal of the event is to market (directly or indirectly) the Vendor's products and when the CME or other continuing education credit is not offered for the event. If NCH Workforce elects to attend the event, NCH Workforce may attend if they decline the meal or pay for their own meal.

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**III.** Vendors may provide or fund and NCH Workforce may accept meals while at the office premises of Vendors or in another business setting if there is a legitimate business purpose to the meal, the setting and nature of the meal are appropriate to the business purpose and are not excessive or extravagant. The meal may not include the spouse, significant other, family member or guest of the NCH Workforce member. The frequency of such meals may not be excessive.

**IV.** Meals during “sales pitch” meetings are prohibited.

**C. Meetings regarding the potential purchase, lease or rental of equipment or services:** NCH Workforce are prohibited from accepting any meals or other gifts from Vendors, regardless of value, during meetings or other interactions regarding the potential purchase, lease or rental of equipment or services, except as permitted by other sections in this policy.

**D.** All other meals, food, snacks, or other food items from Vendors are prohibited off-site unless expressly permitted by this Policy.

### **5. Vendor Funded Educational Events and Vendor Visits to NCH Campus**

#### **A. On-Site Events**

**I.** NCH Workforce may attend on-site educational events that offer continuing education credit regardless of the sponsor. Continuing education events must be coordinated through the appropriate education department.

**II.** For on-site educational events without continuing education credit, the Event must be approved by the appropriate manager or physician chief prior to the event. All other provisions of this Policy, including the sections pertaining to food shall apply to these events.

**III. On-Site Vendor Visits:** Vendor visits will be coordinated in compliance with the [Supplier Guidelines Policy, IV-2](#). Vendor visits are permitted by appointment only and upon approval of the appropriate manager or physician chief.

#### **B. Off-Site Events**



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- I.** NCH Workforce may attend off-site educational events that are sponsored by NCH or that offer CME or other continuing education credit regardless of the sponsor. NCH continuing education events must be coordinated through the appropriate education department and abide by all related hospital policies (e.g., Education Conferences). NCH Workforce are permitted to attend events or conferences that do not offer continuing education credit so long as the event is primarily dedicated, in both time and effort, to promoting objective scientific and educational activities.
- II. Vendor Sponsored Conferences and Workshops:** NCH Workforce may not accept compensation, including the defraying of travel costs, for simply attending a CME or other activity, conference, or workshop unless the NCH Workforce member is speaking or otherwise actively participating or presenting at the activity or conference. All arrangements that include travel and overnight accommodations at no cost to the NCH Workforce member must be approved in advance by the appropriate Senior Vice President or President. If a Senior Vice President or President is the attendee, by the Chief Executive Officer. For physicians, the physician's manager (section chief, Chief Medical Officer, etc.) will provide the approval.
- C.** An NCH Workforce member is permitted to accept an item of nominal value with a Vendor logo on it provided at an educational conference (e.g., coffee mug, tote bag, etc.) if:

  - I.** the item contains the name of the conference or sponsoring organization;
  - II.** the item is provided by the educational conference;
  - III.** the item is provided to all conference attendees.

### 6. Promotional Materials

- A.** Vendor Representatives are prohibited from directly placing any promotional, educational or any other Vendor -related materials in any NCH location.

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- B.** NCH Workforce are permitted to distribute or display high-quality patient education materials produced by a Vendor that are unbiased, are not product-specific, and are applicable to the patient's medical condition.
- C.** Promotional materials that are product-specific or that directly market a Vendor's or products may be distributed to patients only after the materials have been reviewed by the distributing department to ensure the information is generally complete and accurate regarding the Vendor's product, and approval has been granted by the department manager or chief. NCH or the NCH Workforce member will not make any statements that indicate an endorsement of the product. Vendor Representatives are prohibited from distributing material directly to the patient unless authorized to do so by NCH management.
- D.** This policy should not be construed to limit the distribution of accurate and complete instructions for use or safety warnings for any product or medication regardless of the source of the information after it has been ordered or prescribed by a patient.

### 7. Samples

- A. Medication Samples and Vouchers:** The distribution of medication samples is prohibited. Requests for exceptions to this prohibition shall be directed to the Pharmacy and Therapeutics Committee, as detailed in the [Drug Sample Policy \(PFC-356:110\)](#). It is permissible for authorized NCH Workforce to provide medication vouchers (also known as co-pay cards or discount cards) for prescriptions to patients, as long as the prescription is based on appropriate medical decision-making.
- B. Non-Medication Product Samples:** Each department or clinic should ensure that any samples provided are appropriately packaged, in good condition and have not expired.

### 8. Consulting or other arrangements

- A.** NCH Workforce may only serve as paid consultants, principal investigators, or advisors (including reimbursement of reasonable travel expenses) to Vendors in accordance with this and other applicable NCH policies, including, but not limited to the Conflicts of Interest Policy and Outside Activities Policy.

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- B.** Any paid consulting relationship with a Vendor must be disclosed to the NCH Workforce member's direct supervisor and disclosed on the NCH Workforce member's conflict of interest disclosure statement promptly and in accordance with the Conflicts of Interest Policy.
- C.** NCH Workforce should exercise discretion when entering into consulting or advisory relationships. The compensation provided by the Vendor shall be the fair market value of the work provided by the NCH Workforce member.
- D.** For all arrangements, there shall be a signed agreement that outlines, at a minimum, the work to be done for the Vendor and the compensation to be provided by the Vendor. All agreements shall be sent to Legal Services for review and approval.
- E.** Physicians and other individuals employed through one of the controlled affiliates, including but not limited to the Pediatric Academic Association (PAA), are required to follow the affiliate's policies on consulting fees and honoraria.
- F.** NCH Workforce are prohibited from serving as a consultant for a Vendor when the goal of the consulting is to market the Vendor's products.

### **9. "Speaker's Bureau" Events**

- A.** NCH Workforce members should exercise caution, but are permitted to participate in Vendor-sponsored "speakers' bureau" events if:
  - I.** The presentation is to be made in an academic setting (e.g., grand rounds, visiting professor, CME, or other continuing education conference, etc.) or at an event granting CME or other continuing education credit, or
  - II.** The purpose of the event is to provide education on clinical care or research and not to promote the Vendor's products, or
  - III.** The presentation is an education or training activity for the Vendor's employees.
- B.** The NCH Workforce member shall maintain documentation supporting the educational intent of the program (copy brochure with CME language).

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- C.** NCH Workforce are permitted to receive an honorarium or speaker fee from a Vendor for lecturing in a permitted Vendor-sponsored "speaker's bureau" event as defined in section **9.A.** above.
- D.** When presenting at a Vendor-sponsored speakers bureau or other educational event, any slides and other information presented by a NCH Workforce member must have either been prepared by the NCH Workforce member, or the Workforce member must have final editorial rights. Use of slides or other Vendor-prepared educational materials by the NCH Workforce member is not permitted with the exception of FDA-approved slides related to a specific product.
- E.** NCH Workforce are prohibited from participating in a Vendor-sponsored "speakers' bureau" event when the goal of the activity is marketing of the Vendor's products.
- F.** NCH Workforce are prohibited from receiving a retainer or other similar payments simply for being a member of a speakers' bureau. Any payments from a Vendor must be in relation to actually performing a service as a speaker, lecturer, advisory board member, etc.

### **10. Professional Expert Networks and Venture/Investment Company Inquiries**

- A.** Except as outlined in **10.B.**, NCH Workforce members are prohibited from engaging in activities in their field of expertise with "professional expert network" companies (e.g., Gerson Lehrman Group, Guidepoint, AlphaSights) or venture or financial investment companies. Prohibited activities include but are not limited to interviews, panel discussions or surveys.
- B.** Interactions with an investment company that contemplates investing in another company that is optioning or licensing a NCH technology is permitted as long as the interaction is directly related to the technology.

### **11. User Group, Training and Site Visits by NCH Workforce**

- A.** On occasion, it may be appropriate for NCH Workforce to travel to other locations to evaluate new systems, to review installations, or designs of facilities, to receive training, to benefit from the experiences of other users or for other legitimate

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purposes. Costs for the travel will be incurred by NCH. Exceptions to this must be approved by the Senior Vice President of the area/department.

- I.** The Vendor may directly provide meals so long as the setting and nature of the meals are appropriate to the business purpose and are not excessive or extravagant, and meals are not provided for the spouse, family member or other guest of NCH Workforce.
- II.** The NCH Workforce member is prohibited from attending entertainment events at Vendor's expense during visits. NCH Workforce member who chooses to attend entertainment events offered at Vendor's expense during visits must personally pay or reimburse the Vendor for the cost of attending and may not seek reimbursement from the Hospital for the expense.

### **12. Fundraising Events**

Fundraising Events funded by NCH or that are consistent with NCH's mission may be attended by NCH Workforce members or its affiliates at the invitation of a Vendor. The NCH Workforce member shall obtain the permission of his/her supervisor prior to accepting the invitation. NCH Workforce members should not accept such courtesies to the extent that decision making might be influenced or during a Vendor selection process.

### **13. Enforcement**

- A.** Reports of suspected violations by a member of the medical staff will be referred to the Medical Staff Leadership for review and action. Reports of suspected violations by others will be referred to the Office of Compliance and Integrity, Human Resources Department and/or appropriate management for review. Non-adherence and suspected violations will result in review and potential disciplinary action.
- B.** Reports of non-compliance should be made to any of the following:
  - I.** Manager, Chief, or Service Line Administrator. This group is responsible for routine and general oversight of vendor relationships.

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**II.** Compliance Hotline (1-877-267-1935) or Website  
(<https://NCH.EthicsPoint.com>)

**III.** Office of Compliance and Integrity (614-355-0400).

**C.** The Compliance Steering Committee has ultimate oversight of this policy. Situations not addressed by this policy shall be presented to the Chief Compliance Officer, Medical Staff President, and/or Chief Operating Officer for review.

Approved by:

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Richard J. Miller, Chief Operating Officer

Signature on File