

## MEMORANDUM



To: All Allina Hospitals & Clinics Vendors/Suppliers and Industry Representatives

From: Duncan Gallagher, Executive Vice President and Chief Financial Officer  
Penny Wheeler, MD, Chief Clinical Officer  
Derek Kang, Sr. Vice President and Chief Compliance Officer  
Susan Heichert, Sr. Vice President and Chief Information Officer

Date: March 14, 2011

Re: Allina Hospitals & Clinics Policy for Ethical Relationships with Industry

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Effective January 1, 2011, Allina Hospitals & Clinics has adopted a new policy to clarify protocols for interacting with industry representatives (hereinafter, “vendors/suppliers”). This letter provides you with an overview of the key parameters of the policy, as well as references to our gifts policy and the Allina Code of Conduct.

Many aspects of a relationship between Allina employees and Allina’s vendors/suppliers are beneficial and important. An effective relationship can result in knowledge sharing that benefits patient care, Allina, and our industry partners. That said, these relationships must be free from real or perceived conflicts of interest or undue influence in purchasing and utilization decisions. In order to provide direction and boundaries to these relationships, Allina has recently adopted a new policy defining ethical relationships with its vendors/suppliers.

Please carefully review the information provided herein. Your compliance with both the spirit and the expectations outlined in this policy are important measures of your interest in partnership with Allina and good corporate stewardship. Noncompliant vendor activity may result in termination of current arrangements and will be considered during purchasing decisions.

Key elements of this policy affecting your interaction with Allina physicians and employees include:

**Pharmaceutical, Product, Device Samples, or Vouchers:**

- No pharmaceutical samples may be delivered or will be stocked in any Allina Hospital or Allina Clinic. No medication discount cards or medication vouchers may be provided unless under the direction of Pharmacy.
- No product samples may be delivered to an Allina entity unless under the direction of Supply Chain Management or Pharmacy.

**Vendor Information Sessions:**

- Any vendor/supplier information sharing sessions must be requested by and scheduled through Allina. We do not allow drop in visits to a provider, a clinic, a clinical care unit, or a support service of Allina (including but not limited to Pharmacy, Supply Chain Management, Information Services, Human Resources, Finance, and Facilities).

**Please turn over for additional information**

- No food may be provided to Allina physicians and workforce by vendors/suppliers unless as part of an educational session that has been approved for continuing education units through a professional organization such as the ACCME.

**Gifts:**

- No gifts, including cash or cash equivalents (gift cards, gift certificates), will be accepted by Allina workforce members, including its providers.
- No items of personal benefit may be offered by a vendor or received by an Allina workforce member. Examples would include items such as ipods, jump drives, DVD players.
- Allina employees will not accept gifts of entertainment or recreational events or activities such as theater, sporting events, golf or hunting trips, or vacation trips.
- No vendor/supplier branded items, including but not limited to pens, note pads, shirts, tote bags, will be permitted on any of Allina's campuses.
- No gifts, including but not limited to those described above, should be offered to Allina patients.

**Sponsorship of events:**

- Allina will not permit detailing or product informational sessions in any of its clinical locations.
- Allina clinical, operational, and support services will not accept funds to support Allina events for its staff or its patients.
  - Allina will accept funding for patient events or staff educational events through its hospital foundations in the form of an unrestricted donation or grant. Information regarding how to provide such support is available through Stacey Behm, Director of Philanthropy for the Allina Foundation. She can be contacted at [stacey.behm@allina.com](mailto:stacey.behm@allina.com).
  - Allina will not consider funding for such activities in its purchasing process.

**Sponsorship of Travel for Conferences or for Product Selection:**

- Vendor sponsorship of Allina workforce for conferences, including travel and related expenses, is prohibited.
  - With limited exception, Allina will review sponsorship activity through its Conflicts Management Committee.
  - Vendors may support educational opportunities for Allina workforce through donation to an Allina Foundation in the form of an unrestricted grant.
- Allina prohibits vendor sponsorship of Allina staff travel and related expenses for product evaluations. All product evaluation activities should be directed through Allina Supply Chain Management.
- In the event that site visits for system purchases are required, Supply Chain Management, Information Systems, or Pharmacy contract staff shall have oversight to and responsibility for defining the arrangements required in a formal RFP for all suppliers under consideration.
- Allina prohibits vendors from approaching its workforce to discuss such opportunities.

**Consulting Arrangements:**

- All consulting arrangements with physicians employed by Allina or physicians working in an Allina facility or on behalf of Allina and/or the Allina workforce will require review and approval by Allina Corporate Compliance and the Conflicts Management Committee.

We appreciate your adherence to and support of this policy. If you have questions please submit them to our email at [industryrelationships@allina.com](mailto:industryrelationships@allina.com).