



Acceptance of Gifts from Industry/Vendors by Individuals at OHSU

Integrity Office

Mail code L106 IO

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ALL: Never accept from any OHSU Vendor (someone who sells products or services to OHSU or does business with OHSU) or from someone who wants to become an OHSU Vendor:

- Promotional Items. An item that is promotional in nature, such as pens, coffee mugs, paper weights, notepads, clocks, or similar items that contain vendor logos or names.
- Cash Gifts. Gifts of money or cash equivalents, such as gift cards or certificates.

ALL: You may accept the following from an OHSU Vendor:

- Informational Material. Handouts, brochures, publications, or subscriptions related to your official OHSU duties.
- Recognition Awards. An award for service, such as a plaque, if its resale value is no more than \$25.00.
- Vendor Fair Food. Food incidental to vendor "fairs" when it is served reception style.
- Outside employment or volunteer gifts. Gifts as part of (i) an ordinary practice of your private business, or (ii) your employment or volunteer activity outside OHSU, when they bear no relationship to your official OHSU position.
- Certain Gifts Where You Cannot Direct OHSU Business to the Vendor. Food, beverages, and entertainment if you are not in a Position of Authority* relative to the Vendor.

If an item is not listed here but you think it may be acceptable, please check the OHSU Integrity Office web page for more information or contact an Integrity Officer.

Persons Who Can Direct Business to the Vendor: If you are in a Position of Authority* relative to a Vendor, you may accept food, beverages, and related expense reimbursement (but not entertainment) from that Vendor only in conjunction with the following types of activities involving the Vendor as a part of your official OHSU role:

- Speeches; Presentations. Making a presentation or serving as a featured panelist at a professional society or similar meeting, or attending a convention.
- Product Evaluation. Engaging in a product, service, and/or project evaluation activity.
- Reception; Charitable Events. Attending a reception or charitable event.
- Business Meetings. Participating in the review, approval, or execution of documents or closing of a borrowing, investment, or other financial transaction or business agreement.

Relatives of OHSU Personnel: Oregon law similarly limits gifts from OHSU Vendors that may be accepted or solicited by your relatives, including spouse or domestic partner, child, sibling, spouse of sibling, parent, and spouse's parent. OHSU policy requires you to instruct relatives about the limitations on their accepting gifts.

***Position of Authority**: A position in which one does or may influence the selection or retention of an OHSU Vendor, or the expansion or modification of the OHSU Vendor relationship. This includes but is not limited to:

1. Prescribing OHSU health care providers relative to pharmaceutical Vendors;
2. OHSU personnel with grants relative to Vendors supplying services or materials for same;
3. OHSU personnel with fiscal authority relative to a specific business decision with a Vendor; and
4. OHSU personnel as to all Vendor relationships (i) within their oversight authority, (ii) subject to a Vendor selection process in which they participate (i.e. an RFP); and/or (iii) if they can influence the awarding of business to the Vendor.