Policy HR631

Subject	HR631 - Receiving/Accepting Gifts and Business Courtesies from Business Associates		
Category / Section	Human Resources / Workplace Expectation & Guidelines		
Owner	HR Compliance & Regulatory Specialist		
Reviewer(s)	Senior Administrative Group Chair; Executive Vice President and Chief Human Resources Officer		
Effective Date	05/12/11	**Review Frequency**	2 Years
Approval Date	06/22/2020		

Scope of Policy/Procedure ***(applies to entities/locations marked below)***					*(see template for detailed entity/location descriptions)*
X	This document applies to **all** entities/locations listed below				
Hospitals		**Ambulatory/Off-Campus locations**		**Other Carle Entities**	
	All Carle Hospitals listed below:		All Carle ambulatory/off-campus locations listed below:		All other Carle entities listed below:
	Urbana (CFH)		CFH/CPG ambulatory locations *(also includes Home Health, Therapy Services, Medical Supply, Danville Surgicenter, Specialty Pharmacy)*		Arrow Ambulance, LLC
	Hoopeston (CHRHC)		CHRHC ambulatory locations *(includes, CARMC, Cissna Park, Danv-Fairchild, Mattoon-Hurst, Milford, Rossville, Tuscola, Watseka)*		Carle Retirement Centers *(Windsor of Savoy & Windsor Court)*
	Richland (RMH)		Champaign SurgiCenter, LLC		Health Alliance Medical Plans
			Administration Building locations (includes Carle at the Fields)		
	Scope Exclusions *(Mark this box and enter any departments or locations within a marked entity that are exempt from the policy/procedure.)*				

Attachments N/A

Purpose

A. To foster appropriate business relationships between Carle employees and vendors and to reduce the risk of any compliance violations.

Definitions

A. **Business Associates –** Current or potential vendors, contractors or non-clinical service providers.
B. **Carle employee –** All employees of The Carle Foundation, its affiliates and subsidiaries, including Carle Foundation Hospital and Carle Physician Group.
C. **Customer** – A visitor, patient or a patient's family member.

Statement of Policy

A. Receiving/Accepting Gifts
   1. In order to avoid a conflict of interest or the appearance of a conflict of interest, at no time should a Carle employee solicit or accept the following from a Business Associate or Customer:
      a. Personal gifts having a value of $25.00 or more in aggregate per year (e.g., something unique selected specifically for that employee); or
      b. Cash or checks.
   2. Carle employees may accept general business gifts from a Business Associate (e.g., something that does not have a value of more than $100 and is of the nature that it is routinely distributed by the Business Associate) on an infrequent basis. Gift certificates to a local business and tickets to a local sporting event would be considered

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general business gifts. Edible gifts given to a Carle employee for the enjoyment of a department or group are not subject to this limitation.

B. Receiving/Accepting Business Courtesies

1. On occasion, a Carle employee will receive an invitation to attend a social event in order to further develop a business relationship. A Carle employee may accept such invitations under the following circumstances:
   a. The cost associated with such event is reasonable and appropriate (as a general rule the cost cannot be more than $150 per person);
   b. There is no travel and lodging expense associated with the event (except the cost of transportation in the employee's own vehicle);
   c. The event is of a nature that the Business Associate routinely extends invitations to colleagues (e.g., theatre performance, sporting event, etc.);
   d. The Business Associate is in attendance at the event; and
   e. Such invitations to events from the Business Associate to the Carle employee are infrequent.
2. At no time should a Carle employee accept an invitation to training or educational event that includes travel, meals and lodging at a significantly reduced or at no cost without specific permission as defined below. This limitation does not apply to business meetings or training or educational events at which meals are routinely provided.
3. Any exceptions to this policy should be rare and must ultimately be approved in advance by a member of the Senior Administrative Group. If an exception is requested by a member of the Senior Administrative Group, it must be approved by the person to whom she/he directly reports. The Executive Vice President and Chief Human Resources Officer, Executive Vice President & Chief Legal Officer, Associate General Counsel or Chief Risk & Corporate Integrity Officer are available for making any decisions regarding an exemption.
4. Any violations of this policy shall be investigated by the Compliance Office and any discipline will be administered consistent with HR609 - Employee Discipline and Misconduct

Procedure N/A

Other Related Links N/A

References N/A

Electronic Approval on File

Lauren Schmid
Executive Vice President and Chief Human Resources Officer

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