

TITLE: Employee Gift Policy	Reference: GOV-027
MANUAL: Administrative	Page: 1 of 4

**I. PURPOSE:**

To define appropriate business practices related to the sharing of gifts between interested parties and St. Joseph Hospital employees.

**II. DEFINITION OF TERMS:**

Interested party: A vendor, supplier, physician, patient, politician, donor, or other person, who establishes or wishes to establish a relationship with St. Joseph Hospital.

**III. POLICY:**

St. Joseph Hospital intends to maintain ethical business practices and avoid conflicts between personal interests and the interests of the hospital. Intent and appearance are important considerations in our business relationships, therefore, it is the responsibility of all employees to maintain the good name of St. Joseph Hospital in their actions and communications with interested parties. In order to aid employees in understanding the expectations for behavior in this area the following guidelines are established.

**A. PHYSICIAN GIFTS TO EMPLOYEES**

We acknowledge the common practice of physicians and physician groups, especially around the holidays, giving gifts to employees and departments. It is considered reasonable to accept these gifts whenever there is no intent or appearance of unethical behavior and the value of the gift does not exceed \$35 (per employee).

NEW <u>April 2002</u> (DATE)	REVISED <u>July 2005</u> (DATE)	DELETED _____ (DATE)
ORIGINALLY INITIATED BY: <b>John S. Bokosky</b>	DATE <b>4/2002</b>	INTERDISCIPLINARY PRACTICE COMMITTEE (if applicable) DATE
REVIEWED/REVISED BY: <b>Beth H. Padilla</b>	DATE <b>5/2005</b>	POLICY & PROCEDURE COMMITTEE (if applicable) DATE <b>Policy &amp; Procedure Committee 06/05</b>
ADMINISTRATIVE APPROVAL: <b>Alan H. Garrett</b>	DATE <b>5/2005</b>	BOARD OF TRUSTEES (if applicable) DATE
MEDICAL STAFF (if applicable)	DATE	OTHER DATE
PHARMACY & THERAPUTICS (if applicable)	DATE	OTHER DATE

**B. PATIENT GIFTS TO EMPLOYEES**

1. It is the intent of St. Joseph Hospital to encourage patients who want to reward specific employees, departments or the overall hospital to make donations to the Hospital's Foundation. A Foundation pamphlet describing this option is available for sharing with the patient.
2. A patient attempting to give a gift to an employee should be told that it is gratifying to know that the patient wants to express himself or herself in this way, however, just knowing the patient was happy is enough reward. Suggest a gift be made to the Hospital Foundation. If the patient insists or expresses a feeling of sadness that the gift was not accepted, it is reasonable to accept the gift if the value is less than \$35. If this occurs, the employee should report the gift to their immediate supervisor. It is not acceptable under any circumstances to accept a gift from a patient with a value in excess of \$35.

**C. VENDOR OR SUPPLIER GIFTS**

1. Relationships with vendors and suppliers should be maintained in such a manner as to not be problematic when interpreting intent and appearance. Employees should never solicit monies, loans, credits, prejudicial discounts, gifts, honoraria, entertainment or other gratuities from any present or potential interested party. A few examples of inappropriate behavior include:
  - a. Soliciting a vendor for monies or other financial support outside a vendor contract.
  - b. Requesting a personal preferential discount for a service or product.
  - c. Requesting a vendor pay for tuition or other costs associated with attending an educational or other type event outside a vendor contract.
2. Interested parties including vendors and suppliers are not allowed to provide monies, loans, credits, prejudicial discounts or gratuities to any employee of the hospital. A hospital vendor or supplier may provide a gift, entertainment or an honorarium to an employee if it does not exceed \$100 in value and does not occur more than once in a 12 month period. A few examples of inappropriate employee behavior include:
  - a. Accepting a gift in any form exceeding \$100 in value from a vendor or supplier.
  - b. Accepting a personal discount on the purchase of a product or service.

- c. Accepting money offered as a gratuity for past relationships or as a promise for future relationships.

**NOTE:** Employees who are offered a gift that does not meet acceptable criteria from a vendor must refuse the gift upon presentation or return it if sent by mail or other means. The Director of Corporate Responsibility must be notified if a gift is unable to be returned for whatever reason.

**D. VENDOR PROVIDED EDUCATIONAL MATERIALS**

1. Vendors may provide educational materials intended for distribution to patients only with the prior approval of the Patient Family Education Committee. The Patient Family Education Committee will determine the appropriateness of the educational material and describe the targeted patient population to receive the material(s).
2. Vendors may provide educational materials for dissemination to employees only with the prior approval of the department manager.
3. Educational material may contain sponsorship information, however, product endorsements and advertising should be discouraged and avoided if possible. Separate advertising brochures and product endorsements should never be included with educational materials.

**E. VENDOR PROVIDED EDUCATION/TRAINING**

1. All vendor provided education or training related to product or equipment purchases where the vendor is financially responsible for travel, accommodations, and instruction must be documented in the initial vendor contract agreement or in an addendum.
2. The department manager must approve all vendor training and instruction provided on or off site. If the training/instruction can only be provided during the lunch period, it is acceptable for the vendor to provide lunch.

**F. VENDOR PROVIDED PROMOTIONAL PRODUCTS**

Vendors may provide St. Joseph Hospital employees with promotional products such as ink pens (e.g., with vendor logo), sticky note pads, etc., with the approval of the department manager. Department managers allowing vendors to provide these consumables must treat all department vendors consistently, either allowing or disallowing all to do so.

**G. VENDOR PROVIDED FOOD**

Vendors may provide incidental food (donuts, pizza, candy, etc.) to department staff with the approval of the department manager. Food provided must be equally available to all staff working in the department whenever possible.

**H. FOUNDATION DONATIONS**

Vendors and other interested parties may make donations to the Hospital Foundation, if desired, to express gratitude or to provide additional support to St. Joseph Hospital. For further information, refer to Foundation policies and procedures relative to donations received for designated purposes. Employees may accept invitations from vendors, offered at their sole discretion, to attend such events as the Annual Foundation Benefit and TODOS Golf Tournament.

**IV. RELATED POLICIES:**

Employee Conflict of Interest Policy