

ORGANIZATION POLICY

POLICY TITLE: GIFTS AND ENTERTAINMENT POLICY

POLICY NUMBER: 1210

PURPOSE: To establish parameters for the extension of gifts to, and the receipt of gifts from, individuals or organizations who have a business relationship with Onslow Memorial Hospital.

POLICY: OMH staff and agents may give or accept gifts with a total value of \$50 or less in any one year to or from an individual or organization who has a business relationship with OMH. For purposes of this policy, physicians practicing in OMH-affiliated facilities are considered to have such a relationship. Perishable or consumable gifts given to a department or group are not subject to any specific limitation. OMH staff and agents may never accept cash, financial instruments (e.g., checks, stocks), or gift certificates. Under no circumstances may OMH staff or agents solicit a gift.

An individual staff or agent of OMH who has become friends with an individual who has a business relationship with OMH and who engages in the practice of exchanging gifts with that individual may do so without any limits, **provided** the colleague does not include the gift as a business expense for tax purposes and does not charge OMH or otherwise receive reimbursement from OMH to cover this expense.

PROCEDURE:

1. To avoid the appearance of impropriety when giving gifts to, or receiving gifts from, individuals who do business or are seeking to do business with OMH, staff and agents of OMH may never use or allow gifts or other incentives to improperly influence relationships or business outcomes.
2. In order to avoid embarrassment, an effort should be made to ensure that any gift extended on behalf of OMH meets the business conduct standards of the recipient's organization. Gifts to business associates who are not government employees must not exceed \$50.00 per year per recipient.
3. Gifts to Medicare or Medicaid beneficiaries must not exceed \$10.00 per item nor total more than \$50.00 per year per recipient.
4. OMH staff and agents may never give cash or financial instruments (e.g., checks, stocks) to individuals who have a business relationship with OMH.

5. Federal and state governmental agencies have strict rules and laws regarding the receipt of gifts, meals, and other business courtesies for their employees. OMH must never provide gifts, entertainment, meals, or anything else of value to any employee of the Executive Branch of the Federal government, except for minor refreshments in connection with business discussions or promotional items with OMH or facility logo valued at no more than \$10.00. With regard to gifts, meals, and other business courtesies involving any other category of government official or employee, staff and agents of OMH must obtain the approval of OMH's Compliance Office who in connection with OMH Compliance Counsel will determine the appropriate rules which apply to such persons.

Exceptions to this policy are rare and may be granted only by OMH's Compliance Officer.

EFFECTIVE DATE: October 1, 2002

REVISION DATE: November 2004, December 2009, October 2012

REVIEW DATE: October 2008, January 2012, October 2015
October 2018

AUTHORIZED BY: _____
Penney Burlingame Deal, DHA, RN, FACHE
President and Chief Executive Officer

Regina Lanier, MSN, MAEd, RN
Senior VP Chief Nursing Officer

Scott Johnston, M.D.
Chief of Staff

Signed Original in Executive Office