



PURPOSE:

To clarify guidelines for the offering and receipt of Gifts to and from Patients by individuals employed or contracted to provide services on behalf of Bristol Health.

POLICY STATEMENT(S):

It is the organization's Policy that Bristol Health shall conduct all clinical decision-making, research activities and business practices free from the influence of Gifts and in the best interest of Bristol Health and its Patients.

DEFINITIONS:

For the purposes of this Policy, the following definitions shall apply:

Gift: Anything of value, in cash or kind, received or offered for which adequate consideration has not been provided is deemed a Gift, unless an exception applies. The provision of donations collected for the sole purpose of patient assistance and support provided under the Bristol Health financial assistance program are not considered Gifts.

Nominal Value: \$100 or less.

Patient: Any individual receiving or registered to receive medical care under the direction of a Bristol Health physician (including their family members, friends and visitors).

SCOPE:

Organization Wide

PROCEDURE:

GIFTS FROM PATIENTS:

The general rule adopted by the organization is that Bristol Health should not accept Gifts from Patients whenever possible. However, it is understood that there may be certain circumstances where this practice may not be feasible. In those instances, a Gift should only be accepted if it meets the following criteria:

- The Gift is a one-time offering;
- The Gift is not excessive and is of nominal value;
- Acceptance of the Gift would not present an emotional or financial hardship to the Patient;
- The Gift is not cash or a cash equivalent, which are strictly prohibited;
- The Gift is not intended to secure preferential treatment; and
- The Gift is not of a personal or intimate nature.

If deemed appropriate, Bristol Health may suggest that the patient make a charitable donation to the organization's Development Foundation in lieu of a Gift.

If a Gift outside of these criteria is offered and one does not feel comfortable refusing the Gift, the Bristol Health Compliance Office should be contacted for further guidance.

GIFTS TO PATIENTS:

The general rule adopted by the organization is that Bristol Health should not offer Gifts to Patients whenever possible. However, it is understood that there may be circumstances where the offering of a Gift may be warranted and deemed beneficial. In those instances, a Gift should only be offered if it is pre-approved by an individual's immediate supervisor and meets the following criteria:

- The Gift is a one-time offering;
- The Gift is not excessive and is of nominal value;
- The Gift is not of a personal or intimate nature;
- The Gift is not cash or a cash equivalent, which are strictly prohibited;
- Waiving of co-pays and deductibles for Medicare and Medicaid Patients may only be provided in very limited circumstances and must be pre-approved by the Bristol Health Compliance Office; and
- Promotional items of nominal value may be provided.

If a Gift outside of these criteria is anticipated to be offered to a Patient the Bristol Health Compliance Office should be contacted for further guidance prior to giving the Gift.

MISCELLANEOUS:

This policy may be revised, supplemented, or rescinded at any time as Bristol Health deems appropriate in its sole and absolute discretion, without prior notice. This policy (and any other policy) does not constitute a contract of employment and does not in any way limit or modify employees' at-will employment status.

REFERENCES:

Code of Conduct
C-02 Compliance Program Policy
C-06 Conflict of Interest Policy
C-09 Vendor Interaction Policy