


ENTERPRISE DOCUMENT

	Policy Section/ Number: 1.CE.14 EWPOL				
	Effective Date: 10/2022				
	Supersedes: 05/2020				
	Responsible Party: Vice President, Compliance Operations & Enterprise Risk Management				
	Final Approving Body: <input checked="" type="checkbox"/> UPH Compliance Committee <input type="checkbox"/> UPH Clinical Leadership Group <input type="checkbox"/> UPH Operational Leadership <input type="checkbox"/> UPH Board of Directors				
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Procedure	<input type="checkbox"/> Protocol	<input type="checkbox"/> Guideline	<input type="checkbox"/> Form	<input type="checkbox"/> Other
DOCUMENT TITLE: Gifts and Business Courtesies					
DOCUMENT SCOPE: Enterprise-wide					

PURPOSE:

Representatives of Iowa Health System, d/b/a UnityPoint Health (“UPH”), and UPH Affiliates (collectively, “UPH Entity(ies)”) may offer or accept Gifts or Business Courtesies (as defined below) only according to this Policy.

BACKGROUND:

This Policy establishes parameters around the offering and acceptance of Gifts and Business Courtesies between UPH Representatives and individuals and entities outside UPH (“Non-UPH Representatives” or “Non-UPH Entities”). The offering or accepting of Gifts or Business Courtesies for personal use is generally discouraged but is permissible if done in compliance with this Policy. UPH Representatives are encouraged to share Gifts or Business Courtesies with co-employees or to use the Gift or Business Courtesy for UPH business purposes. This Policy applies to UPH Representatives while acting on behalf of or within the scope of their employment or responsibility with a UPH Entity and does not apply to gifts offered or accepted by individuals that are unrelated to the person’s job or responsibilities with a UPH Entity. Nor does this Policy apply to compensation or gifts from a UPH Entity and a UPH Employed Team Member resulting from their employment by the UPH Entity.

DEFINITIONS:

Terms not otherwise defined within this document include the following terms. Standard definitions may be found in [Policy 2.AD.01, Systemwide Policy Development](#).

26 **CONTRIBUTIONS:** Any tangible item, including cash. This could include donated items or
27 cash from Vendors to provide to or purchase for employees to support a wellness program (i.e.,
28 pedometers, chair massages).

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30 **EDUCATIONAL CONFERENCE OR PRESENTATION:** An activity that has a primary
31 purpose, dedicated both in time and effort, to promoting educational activities and discourse, is
32 held at an appropriate location for the subject matter being conveyed, and is intended to bring
33 attendees together to further their knowledge on the topics being presented.

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35 **GIFTS AND BUSINESS COURTESIES:** Gifts and Business Courtesies include anything
36 offered or accepted between a UPH Representative or UPH Entity and a Non-UPH Representative
37 or Non-UPH Entity at reduced/no cost. These include, but are not limited to, meals, entertainment,
38 social events, professional courtesy discounts, tickets, golf fees, apparel, and food.

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40 **INTANGIBLE GIFTS AND BUSINESS COURTESIES:** Non-tangible gifts and business
41 courtesies such as golfing fees, attendance at a concert or sporting event, personal travel in a private
42 aircraft, meals, and lodging expenses.

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44 **NON-UPH ENTITY:** Organization that provides goods or services to a UPH Entity or that
45 accepts goods or services from a UPH Entity. Specifically includes “Vendors” as defined above.

46
47 **NON-UPH REPRESENTATIVE:** Any of the following individuals:

- 48 • an employee of a Non-UPH Entity (as defined above);
- 49
- 50 • a contractor providing services on behalf of a Non-UPH Entity; or
- 51
- 52 • a current or former patient of a UPH Entity and their family members.
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54 **TANGIBLE GIFTS AND BUSINESS COURTESIES:** Material, physically tangible to touch,
55 items such as golf bags, clothing, and food. This also includes cash or a cash equivalent (i.e.,
56 checks, stock instruments) and other items that can readily be converted to cash or used like cash.

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58 **UPH ENTITY:** Includes UPH and each Affiliate.

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60 **UPH REPRESENTATIVE:** Any of the following persons:

- 61 • UPH Entity Employed Team Members;
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- 63 • Members of the Board of Directors of a UPH Entity; or
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- 65 • Employed Team Members working for, or providing services to, a joint venture entity
66 between a UPH Entity and a third party.
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68 **VENDOR:** See, “Contractor/Vendor” above.

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APPLICATION:

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73 This policy, 1.CE 14, applies to anyone acting on behalf of UPH or its Affiliates (collectively,
74 “UPH Representatives”). Notwithstanding the foregoing, vendor presentations and other vendor
75 interactions occurring at clinics owned by UPC or with UPC providers at other UPC locations shall
76 be governed UPC Policy 2.CL, *Pharmaceutical Representative and Other Industry/Organization*
77 *Interactions*, incorporated herein by reference. UPC Policy 2.CL shall govern the actions of Team
78 Members and Providers (including independent providers if performing services on behalf of UPH
79 or a UPH Affiliate) while performing services at UPC clinics and other UPC locations. UPC may
80 make changes to UPC Policy 2.CL from time-to-time in accordance with its governing procedures.
81 If both UPC Policy 2.CL and UPH Policy 1.CE14 apply and there is an inconsistency between
82 these policies, UPC Policy 2.CL shall control.
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POLICY:

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86 A. Basic Rules Applicable to All Gifts and Business Courtesies (“Basic Rules”). The
87 following Basic Rules are applicable to all Gifts and Business Courtesies:
88
89 1. Gifts and Business Courtesies cannot be offered or accepted to improperly
90 influence decision-making with regard to the UPH Entity. UPH Policy 1.CE.02,
91 Code of Conduct, requires that decisions made by UPH Representatives are to be
92 objective, unbiased decisions that are in the best interests of the UPH Entity and
93 that the person making the decision be free of inappropriate conflicts of interest.
94
95 2. No purpose of a Gift or Business Courtesy can be to induce the referral of a patient,
96 or the ordering of a service or supply paid for by a governmental health care
97 program such as Medicare or Medicaid. The Anti-Kickback Statute is a federal
98 criminal law that prohibits any type of remuneration to be exchanged if a purpose
99 of the remuneration is to induce the referral of patients or the ordering of a service
100 or supply paid for by a governmental health care program.
101
102 3. Gifts or Business Courtesies that are cash or a cash equivalent (i.e., checks, stock
103 instruments, and other items that can readily be converted to cash or used like cash,
104 such as a general-purpose debit card) may not be offered or accepted.
105
106 4. Stark Law Rules. No Gifts or Business Courtesies offered or accepted between an
107 independent physician(s) and a UPH Representative or UPH Entity can be
108 calculated in a manner that takes into account the volume or value of referrals or
109 other business generated between the UPH Entity and the independent physician(s)
110 or physician group.
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112 B. Employed Team Member Standards.
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114 1. Acceptance of Gifts and Business Courtesies by Employed Team Members. If an
115 Employed Team Member accepts a Gift or Business Courtesy within the

- 116 requirements of this Policy, the Employed Team Member is encouraged to share
117 the item with other employees or to use the item for UPH business purposes. See
118 Section B.4 for Exchange of Gifts with Patients
119
- 120 2. Acceptance of Tangible Gifts and Business Courtesies by Employed Team
121 Members. Employed Team Members may only accept Tangible Gifts or Business
122 Courtesies if the Basic Rules are not violated, the item is not of substantial value
123 (One Hundred Dollars (\$100) or less), and the item is not offered more than three
124 (3) times annually, totaling Three Hundred Dollars (\$300). See exception language
125 is in Section B.5.
126
- 127 3. Acceptance of Intangible Gifts and Business Courtesies by Employed Team
128 Members. Employed Team Members may accept personal, intangible Gifts and
129 Business Courtesies (such as golf fees or the attendance at a sports or entertainment
130 event) from a Non-UPH Representative or Non-UPH Entity if:
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- 132 a. the Basic Rules are not violated;
133
- 134 b. the value of the intangible Gift or Business Courtesy, such as attending a
135 concert or athletic event, is no more than One Hundred Dollars (\$100) per
136 person;
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- 138 c. no travel or expenses are paid by the Non-UPH Representative or Non-UPH
139 Entity;
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- 141 d. the acceptance of such intangible Gift or Business Courtesy, such as the
142 attendance at such event(s) is infrequent, not more than four (4) times per
143 year, from a single Non-UPH Representative or Non-UPH Entity; and
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- 145 e. if the intangible Gift or Business Courtesy is attendance at an event, such
146 as a concert or athletic event, the host (the Non-UPH Representative or Non-
147 UPH Entity sponsoring the attendance) is at the event and business is
148 discussed.
149
- 150 4. Additional Rules Regarding Employed Team Member Exchange of Gifts or
151 Business Courtesies with Patients.
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- 153 a. Employed Team Members may: (i) accept Gifts or Business Courtesies
154 from patients; or (ii) offer Gifts or Business Courtesies to patients if the
155 Basic Rules are not violated and the Gift or Business Courtesy has a value
156 of less than Fifteen Dollars (\$15) individually and less than Seventy-Five
157 Dollars (\$75) total, per patient per year.
158
- 159 b. No Solicitation. Employed Team Members are prohibited from asking for
160 tips, gratuities, or Gifts or Business Courtesies from patients or patient

- 161 representatives, and Employed Team Members may not accept tips or
162 gratuities from patients or patient representatives.
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- 164 c. Donations. If a patient or other individual wishes to make a donation or
165 other Gift to a UPH Entity, the patient or other individual should be put in
166 contact with the appropriate Foundation Office.
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- 168 5. Exceptions. Any exception to the rules in this Section B must be approved, in
169 advance, by the Employed Team Member's supervisor and the UPH Entity
170 Compliance Officer or CEO. Any exception by the CEO requires the prior approval
171 of the UPH Entity Compliance Officer. Documentation of the exception should be
172 maintained for a minimum of two (2) years.
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- 174 C. Gifts or Business Courtesy Standards for Board Members. Board Members may offer or
175 accept Gifts and Business Courtesies if:
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- 177 1. the Basic Rules (above) are not violated; and
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- 179 2. the value of the Gift or Business Courtesy does not exceed appropriate community
180 standards (i.e., the Board Member and the UPH Entity would be comfortable if the
181 acceptance of the item became known in the community).
182
- 183 D. UPH Representative or UPH Entity Offering Gifts or Business Courtesies. See also, Policy
184 1.PS.13, Providing Free or Below Fair Market Value Items, Services or Other Benefits to
185 Physicians.
186
- 187 1. Offering Tangible Gifts or Business Courtesies. A UPH Representative or UPH
188 Entity may offer Tangible Gifts or Business Courtesies (such as a tote bag or food)
189 to a Non-UPH Representative or Non-UPH Entity if:
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- 191 a. the Basic Rules (page 3) are not violated; and
192
- 193 b. the value of the Gift or Business Courtesy is less than Seventy-Five Dollars
194 (\$75) per Gift or Business Courtesy or less than Two Hundred Dollars
195 (\$200) in total per year to any single Non-UPH Representative.
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- 197 2. Offering Intangible Gifts or Business Courtesies. A UPH Representative or UPH
198 Entity may offer Intangible Gifts or Business Courtesies to a Non-UPH
199 Representative or Non-UPH Entity, if:
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- 201 a. the Basic Rules (page 3) are not violated;
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- 203 b. the value of the Intangible Gift or Business Courtesy is less than One
204 Hundred Twenty-Five Dollars (\$125) per person;
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- 206 c. no travel or expenses are paid by the UPH Representative;

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- d. the offering of such Intangible Gift or Business Courtesy occurs no more than four (4) times per year to a single Non-UPH Representative; and
 - e. if the Intangible Gift or Business Courtesy is the attendance at an event, the UPH Representative sponsoring the attendance is at the event and UPH business is discussed.
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3. Exceptions. Any exception to the rules in this Section D must be approved, in advance, by the Employed Team Member's supervisor and the UPH Entity Compliance Officer or CEO. Any exception by the CEO requires the prior approval of the UPH Entity Compliance Officer. Documentation of the exception should be maintained for a minimum of two (2) years.
- 221 E. Additional Rules for Vendors. In addition to the above rules in Section B, the following
- 222 rules apply to an Employed Team Member's acceptance of Gifts or Business Courtesies
- 223 from Vendors.
- 224
- 225 1. Acceptance of Gifts and Business Courtesies from Vendors.
- 226
- 227 a. Acceptance of Tangible Gifts and Business Courtesies from Vendors. The
- 228 following requirements must be met:
- 229
- i. the item's fair market face value is One Hundred Dollars (\$100) or less;
 - ii. the item is an "educational item". Educational items are tangible items designed primarily for the education of patients or health care professionals. These items have no value to health care professionals outside of their professional responsibilities (i.e., an anatomical model used in an examination room is intended for the education of the patients; however, a DVD or CD player may have independent value to a health care professional even though it could be used to provide education); and
 - iii. the item is not offered more than three (3) times annually, totaling Three Hundred Dollars (\$300). See exception language in Section E.1.i.
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- 246 b. Acceptance of Meals Supplied by Vendors. Each UPH Entity may choose
- 247 whether or not to allow meals to be supplied by Vendors. Meals must be:
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- i. modest by local standards ("modest" means one similar to what an employee might have when dining at his or her own expense);
 - ii. accompanied by an Educational Conference or Presentation;
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- iii. provided in a manner conducive to communication. Meals dropped off at a UPH location where the Vendor does not provide an educational presentation or “dine and dash” situations where a Vendor representative is “available” at a restaurant to talk to a physician while the physician’s take-out food is being prepared (paid for, of course, by the vendor) or any other situation where meals paid for by a Vendor are eaten without a Vendor representative present are not acceptable; and
 - iv. limited to in-office or in-hospital settings.
- c. Acceptance of Vendor Subsidy for Educational Conference or Presentation.
- i. A Vendor may subsidize an Employed Team Member’s attendance at an Educational Conference or Presentation sponsored by a Non-UPH Entity only by offering such subsidy directly to the Conference’s sponsor, who in turn can apply the subsidy to reduce the Conference registration fee or cost of meals and lodging for all participants.
 - ii. An Employed Team Member should not accept direct payments from a Vendor to defray the registration costs of an Educational Conference or Presentation.
 - iii. An Employed Team Member should not accept a subsidy, directly or indirectly, from a Vendor to pay for the costs of travel, lodging, or other personal expenses of the Employed Team Member in connection with an Educational Conference or Presentation, nor should subsidies be accepted to compensate for an Employed Team Member’s time.
 - iv. An Employed Team Member may not individually accept from the Vendor any meals, lodging, or social events held as part of an Educational Conference or Presentation.
- d. Acceptance of Vendor-Sponsored Training. In the event that a UPH Entity has purchased or leased an item (e.g., equipment or software) from a Vendor, and as part of the purchase price of the item, Employed Team Member(s) have been invited by the Vendor to travel to another location to learn how to operate the item, then UPH employee(s) may accept the cost of reasonable travel expenses and modest meals and lodging provided by Vendor so long as the UPH employee’s supervisor has approved the trip in advance.

- 298 e. Acceptance of Items Related to Evaluation of Vendor's Product or Services.
299 If a Vendor offers to provide or pay for the travel and accommodation of
300 Employed Team Members related to the evaluation of a Vendor's product
301 or service, the UPH Entity may accept the Vendor's offer if:
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- 303 i. the fair market value of the travel and accommodations are
304 submitted by the Employed Team Member as business expenses;
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 - 306 ii. the UPH Entity bills the Vendor for the travel and accommodations;
307 and
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 - 309 iii. the Employed Team Member's supervisor approves the travel and
310 accommodations prior to the travel.
311
- 312 f. Acceptance of Contributions from Vendors. Contributions from Vendors
313 are welcomed by UPH Entities. Contributions may include any tangible
314 items including cash from Vendors to provide to or to purchase for
315 employees to support a wellness program (i.e., pedometers, chair
316 massages). Each UPH Entity must evaluate any conditions that are attached
317 by the Vendor to the contribution, and whether or not any such conditions
318 violate the Basic Rules (above) or restrict the UPH Entity's ability to meet
319 its mission. Vendor contributions that are not permitted by this Policy
320 should be either declined or restructured to be acceptable.
321
- 322 g. Acceptance of Prizes Awarded by Vendors. If an Employed Team Member
323 is awarded a prize as part of a Vendor-sponsored promotion or contest open
324 to a broad audience, the Employed Team Member may keep the prize if its
325 value is less than One Hundred Twenty-Five Dollars (\$125). If the value
326 of the prize is higher, then the Employed Team Member must report the
327 circumstances to the UPH Entity Compliance Officer. The UPH Entity
328 Compliance Officer and the Employed Team Member's supervisor will
329 evaluate the circumstances to determine whether the Employed Team
330 Member may keep the prize or must request that the Vendor donate it to the
331 Entity.
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- 333 h. Acceptance of Items Related to Faculty/Speakers, Consultants or
334 Researchers.
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- 336 i. Faculty/Speakers. UPH Representatives who serve as faculty or
337 speakers at an Educational Conference or Presentation may accept
338 reasonable honoraria and reimbursement for modest travel, lodging
339 and meal expenses from a Vendor that funds the event.
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 - 341 ii. Consultants. UPH Representatives may accept reasonable
342 compensation and reimbursement for reasonable travel and lodging

- 343 expenses if the UPH Representative is providing bona fide
344 consultant services to such Vendor.
345
- 346 iii. Travel for Research Purposes. If a UPH Representative travels to
347 convene for a genuine research purpose, a Vendor may pay for
348 reasonable travel expenses of the UPH Representative if approved
349 by the Employed Team Member’s supervisor. “Genuine research
350 purpose” means a purpose that is exclusively dedicated to research
351 and is not for promotional purposes. For example, it is permissible
352 for a Vendor that is convening a group of medical personnel to
353 recruit clinical investigators to pay for such expenses if approved in
354 advance by the Employed Team Member’s supervisor.
355
- 356 iv. Use of Benefits or Paid Time Off (“PTO”) for Faculty, Consultant
357 or Research. If an Employed Team Member uses PTO time for their
358 role as faculty, consultant, or researcher, then the Employed Team
359 Member may keep any fees or compensation unless otherwise
360 provided in their employment agreement. If PTO benefits are not
361 used, the fees or compensation must be given to the UPH Entity that
362 employs the Employed Team Member.
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- 364 i. Exceptions. Any exception to the rules in this Section E must be approved,
365 in advance, by the Employed Team Member’s supervisor and the UPH
366 Entity Compliance Officer or CEO. Any exception by the CEO requires
367 the prior approval of the UPH Entity Compliance Officer. Documentation
368 of the exception should be maintained for a minimum of two (2) years.
369

370 F. Additional Requirements.
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- 372 1. Events When Host Not Present. If an Employed Team Member offers or accepts
373 tickets to a sporting, theatrical or similar event, as provided in B.3. and D.2. above,
374 and the person or entity offering the tickets is not at the event and business is not
375 discussed, as provided above, then the Employed Team Member accepting the
376 tickets should pay, from their personal funds, for the fair market face value of the
377 tickets, thus removing the transaction from the scope of this Policy.
378
- 379 2. Physician Recruitment. For further guidance regarding meals or other events
380 related to the recruitment of a physician, see Policy 1.PS.07, Recruitment of Non-
381 Employed Physicians.
382
- 383 3. Private Matters Outside Scope of Policy. UPH Representatives may offer gifts and
384 business courtesies when the UPH Representative is not acting on behalf of a UPH
385 Entity, the UPH Representative does not include these costs as a business expense
386 for tax purposes, and does not accept reimbursement from the UPH Entity to cover
387 this expense.
388

- 389 4. Political Gifts and Political Action Committees. Gifts or donations to political
390 candidates, organizations, or Political Action Committees may not be paid or
391 reimbursed by UPH or a UPH Entity. See, Policy 1.TX.02, Political
392 Contributions/Activities.
393
- 394 5. Family Members. The scope of gifts or business courtesies includes family
395 members and others who accept the gift or business courtesy on behalf of the Non-
396 UPH Representative or family members and others who accept the gift or business
397 courtesy on behalf of a UPH Representative.
398
- 399 6. Settlement of Disagreements or Complaints. Nothing in this Policy affects the
400 ability of a UPH Entity from agreeing to resolve a disagreement with a Vendor or
401 a complaint from a patient.
402
- 403 7. PTO Contributions. Employed Team Members' contributions of PTO to
404 individuals or for purposes approved by the UPH Entity are not prohibited by this
405 Policy.
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407
408 */s/ Andrea Eklund*

409 _____
410 Andrea Eklund
411 UPH Chief Compliance Officer
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413 Date: October 26, 2022
414

415 References:
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417 <https://www.gpo.gov/fdsys/pkg/FR-2016-12-07/pdf/2016-28297.pdf>; AdaMed Code: [http://form-](http://form-allreview.rhcloud.com/irs/advamed-code-of-ethics-on-interactions-with-health-care-/)
418 [allreview.rhcloud.com/irs/advamed-code-of-ethics-on-interactions-with-health-care-/](http://form-allreview.rhcloud.com/irs/advamed-code-of-ethics-on-interactions-with-health-care-/); PHRMA
419 Code: [http:// phrma-docs.phrma.org/sites/default/files/pdf/phrma_marketing_code_2008-1.pdf](http://phrma-docs.phrma.org/sites/default/files/pdf/phrma_marketing_code_2008-1.pdf)
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421 Addenda:
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423 Addendum A, "Legal Entity Operating Hospital"
424 Addendum B, "Summary of Changes"

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Addendum A: Legal Entity Operating Hospital

The below are entities for which the Document has been adopted, except if noted as an exception on the first page under “Scope” and except if the hospital does not provide the service which is the topic of the Document. **The entities listed below are accurate as of January 11, 2023. A current listing of legal named entities can be found at:**

<https://uphealth.sharepoint.com/sites/intranet/policies/UPHandSystemwide/Addendum%20A.pdf>

<u>Region</u>	<u>Legal Entity Operating Hospital</u>
CEDAR RAPIDS	ST. LUKE’S METHODIST HOSPITAL
CEDAR RAPIDS	ST. LUKE’S/JONES REGIONAL MEDICAL CENTER
DES MOINES	CENTRAL IOWA HOSPITAL CORPORATION D/B/A UNITYPOINT HEALTH – DES MOINES
DES MOINES	GRINNELL REGIONAL MEDICAL CENTER
DUBUQUE	THE FINLEY HOSPITAL
FORT DODGE	TRINITY REGIONAL MEDICAL CENTER
PEORIA	METHODIST MEDICAL CENTER OF ILLINOIS
PEORIA	PEKIN MEMORIAL HOSPITAL
PEORIA	PROCTOR HOSPITAL
QC – MUSCATINE	UNITY HEALTHCARE
QUAD CITIES	TRINITY MEDICAL CENTER
SIOUX CITY	NORTHWEST IOWA HOSPITAL CORPORATION
WATERLOO	ALLEN MEMORIAL HOSPITAL CORPORATION
WATERLOO	UNITYPOINT HEALTH – MARSHALLTOWN
MADISON	MERITER HOSPITAL, INC.

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Addendum B: Summary of Changes

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A. Document Change Details The information below corresponds to the initial adoption of the document or, if the document has been amended, the most recent amendment. The Compliance Department shall retain Summary of Changes Addenda which document a document’s initial adoption and any subsequent document amendments.

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Standard Approving Bodies:	Action/Date:
Chief Medical Officer Group	
Chief Nurse Executive Group	
Clinical Policy Review Committee	
Clinical Leadership Group	
Core Council	
UPH Compliance Committee	08/22/2022
Specific Stakeholder Groups:	Action/Date:

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B. Summary of Updates:

Reviewed/ Revised Date:	Summary of Changes:
05/2004	Policy was created.
05/2007	N/A
03/2018	N/A
05/2020	Scope update only.
10/2022	Put policy in new policy template; added language clarifying that vendor presentations and other vendor interactions occurring at clinics owned by UPC or with UPC providers at other UPC locations shall be governed UPC Policy 2.CL, <i>Pharmaceutical Representative and Other Industry/Organization Interactions</i> , incorporated into the policy by reference. UPC Policy 2.CL shall govern the actions of Team Members and Providers (including independent providers if performing services on behalf of UPH or a UPH Affiliate) while performing services at UPC clinics and other UPC locations.
01/2023	Policy was updated to new template, no other revisions were made.
02/2023	Policy was updated to correct an error identified in minutes of 11/21/2022 CRPC meeting, “gifts to patients should be no more than \$15 per items <i>and</i> (not “or”) \$75 per year.”

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452 NOTE: Contact the UPH Compliance Department for prior versions.