

Date of Review: June 17, 2008

Original Date: June 8, 2001

Prior Reviews: June 11, 2007; March 31, 2006 & February 6, 2004

Approved: Robert R. Michalski

Subject: **Gifts & Gratuities Policy
for Business Operations**

EFFECTIVE DATE: June 8, 2001

PURPOSE: To establish the parameters surrounding offering gifts to and accepting gifts from anyone that has a business relationship with West Penn Allegheny Health System (WPAHS) (i.e. suppliers, vendors, agents, independent contractors, physicians practicing at a WPAHS facility, visitors, patients or their families).

POLICY: Subject to the limitations outlined below, gifts may be received or given that do not exceed \$50 per gift and an aggregate of \$300 per year.

“Gift” is defined as any gratuity, favor, discount, hospitality, loan, forbearance, or other item or service having monetary value which is bestowed or acquired without being sought or earned by the receiver.

PROCEDURE:

Accepting Gifts

1. Generally, WPAHS and its subsidiaries’ employees, medical staff and board members acting in their capacity for the organization are not permitted to accept gifts that exceed \$50 in value per gift or in excess of \$300 in any one year from any individual or organization who has a business relationship with WPAHS. Gifts in excess of this may only be accepted if they are donated to the institution through the employee’s responsible Vice President.
2. You may never accept cash or cash equivalents, such as checks, gift certificates or shares of stock from any individual or organization who has a business relationship with WPAHS. Individuals desiring to give a monetary gift should be directed to Hospital Administration so the gift can be made in honor of an individual or earmarked for use by a certain department and receipts are generated for tax deduction purposes.
3. Under no circumstances may you solicit a gift.
4. Advertising novelties of nominal value, such as pens, pencils, mugs, calendars, etc. may be accepted without counting towards the \$50 per gift, or \$300 per year limit from any one individual or organization.
5. Perishable or consumable gifts that are given to a department or group are not subject to the \$50 limitation.

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Giving Gifts

1. Gifts must never be used to improperly influence relationships or business outcomes.
2. Gifts to business associates must not exceed \$50 per gift, or exceed \$300 per year, per recipient.
3. You may never give cash or cash equivalents, such as checks or gift certificates.
4. Gifts in excess of \$50 per gift or \$300 per year may be provided to recognize the efforts of those business associates who have spent meaningful amounts of volunteer time on behalf of WPAHS. An employee must obtain the approval of his/her responsible Vice President and report the exception to the Vice President, System Compliance.
5. WPAHS employees, physicians and board members acting in their capacity for the organization may not offer gifts, entertainment, meals, or anything else of value to any employee of the Federal government or a Fiscal Intermediary except for minor refreshments provided at a meeting in a System facility in connection with business discussions. Consult with the Compliance Office regarding gifts to other federal, state or local government officials.