

<i>Policy Title:</i> Acceptance of Gifts	<i>Policy #:</i> ADM-0491
	<i>Procedure #:</i> ADM-0873
<i>Department:</i> Organizational Integrity	<i>Effective:</i> 02/11/2016
<i>To Review:</i> VP Organizational Integrity	<i>Next Review:</i> 09/10/2022

SCOPE

This Policy applies to all members of the PeaceHealth Workforce.

PURPOSE

The Purpose of this Policy is to establish requirements for the acceptance of gifts and other considerations by members of the PeaceHealth Workforce from industry vendors and others.

POLICY

Gifts given to individual members of the PeaceHealth Workforce, or as Institutional Gifts to PeaceHealth, can compromise or appear to compromise the obligation to act in the best interests of PeaceHealth, PeaceHealth patients, or PeaceHealth research subjects when such gifts are offered by patients, industry vendors, and others doing business or seeking to do business with PeaceHealth. Therefore, it is the policy of PeaceHealth that Workforce members may not solicit individual Gifts. Further, they may not accept unsolicited Gifts when doing so would influence or appear to influence PeaceHealth's business decisions related to the giver of the Gift. Any Gift intended or perceived to induce or reward referrals is similarly prohibited.

With the understanding that acceptance of Institutional Gifts may have the appearance of undue influence, it is acknowledged that philanthropy is crucial in supporting PeaceHealth's mission. This policy recognizes the importance of those Institutional Gifts and ensures that their acceptance does not create a conflict of interest.

This policy provides a foundation for compliance across the PeaceHealth system. Networks and Communities may implement policies and/or procedures on this topic that provide additional requirements, processes, information, and/or guidance, so long as those policies and procedures do not conflict with or adopt a lower standard than this policy.

Organizational Integrity is authorized to develop, implement, and update procedures and policy compliance rules to support compliance with this policy. Individuals included in the Scope of this policy are required to comply with all procedures that are associated with it. Violations are subject to corrective action, up to and including termination of employment or other relationship with PeaceHealth.

DEFINITIONS

Gift means something with financial value offered or given for no or below market value including but not limited to cash; gift cards and gift certificates; items of token value such as notepads, pens, coffee mugs, clocks, or similar promotional items; food; beverages; cruises; travel; and entertainment such as attendance at or tickets to theater or sporting events, movies, concerts, or similar events. The definition excludes informational material, publications, or subscriptions related to the PeaceHealth Workforce member's official duties.

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Institutional Gift means something with financial value provided to PeaceHealth or any of its operating units, foundations or affiliates. Such gifts include monetary funds, grants, donations, sponsorship for clinical care or research, support for construction or enhancement of facilities, sponsorship of educational events, textbooks, subscriptions, equipment, devices, supplies, and similar gifts of value in promoting PeaceHealth’s mission.

Workforce means employees (caregivers), volunteers, trainees, and other persons whose conduct, in the performance of work for PH, is under the direct control of PH, whether or not they are paid by PH. For purposes of this Procedure, Workforce includes but is not limited to:

- Members of the PeaceHealth System Board;
- Members of Community Boards;
- Members of Foundation Boards
- Committees with board-delegated powers;
- System and Community officers and employees;
- Employed providers; and
- PeaceHealth or Health Ventures representatives on joint ventures’ boards

Vendor means an industry, business, service provider, contractor, or representative of same that currently has a business relationship with PeaceHealth or is seeking a business relationship with PeaceHealth including, but not limited to, a business that is selling products or services to PeaceHealth, is seeking to sell products or services to PeaceHealth, or is seeking product/service endorsement or similar services from a member of the PeaceHealth Workforce.

HELP

Further guidance concerning this Policy may be obtained from the [Local OI Compliance and Privacy Officer](#). Questions regarding the acceptability of gifts should be referred to the System Vice President for Organizational Integrity.

RELATED MATERIALS

Job Aids & Tools:

- [FAQ: Acceptance of Gifts](#)

PeaceHealth Policies & Procedures:

- [Acceptance of Gifts](#) Procedure No. ADM-0873(PH-SYS)
- [Gifts to Caregivers](#) (PH-SYS)
- [Business Courtesies to Potential Referral Sources](#) (PH-SYS)
- [Outside Activity/Outside Compensation](#) (PH-SYS)
- [Reporting of Philanthropic Contributions](#) (PH-SYS)

Practice Advisories, Guidelines, and Statements:

- [JAMA Commentary: A Social Science Perspective on Gifts to Physicians From Industry](#)
- [JAMA Special Communication: Health Industry Practices That Create Conflicts of Interest](#)

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- [Physician Financial Transparency Reports \(Sunshine Act\)](#)

APPROVALS

Initial Approval: System Leadership Group approved Policy No ADM-0491 February 11, 2016.

Subsequent Review/Revision(s):

VP Organizational Integrity approved review; 09/10/2019