

Sample Gift Policy Reminder

As the holiday season is upon us, we want to take this opportunity to remind all of our employees and team members about our gift policy. As a healthcare provider who participates in federal government healthcare programs, it is important that gifts and business courtesies from other providers, vendors, and our business partners do not influence or interfere with decision-making or create the appearance of impropriety. For this reason, we have a gift policy which provides that:

[summarize your gift policy]

Gifts from patients and their families can also create compliance concerns and are subject to our gift policy.

Examples of gifts to individual employees or departments that are generally allowable are gifts limited to one time of year which are unlikely to influence or interfere with decisions such as:

[give examples]

Examples of gifts which are potentially problematic because they may create the appearance of impropriety include:

[give examples]

This policy also applies to gifts that you may give to others, such as other providers. Generally, all gifts to a provider, referral source, patient, or _____ should be reviewed and approved by _____ to ensure it doesn't violate our gift policy or create compliance issues.

If you receive a gift from a third party (such as another healthcare provider, a vendor, or another third party we do business with or a patient) that is not of obvious nominal value (such as a plate of homemade cookies, a small company branded item like a water bottle), please report it to _____. _____ will work with you to review the context and the specific gift at issue and determine whether it creates a concern under our policy. If it does, then we will work with you to determine how to repurpose the gift internally in a manner that does not create concerns or take other appropriate action such as donating it or returning it.

Please contact _____ with any questions about this policy or gifts.