

**1.02 BUSINESS COURTESIES POLICY**

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Chief Compliance Officer

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**Approved By:**

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Executive Compliance Committee

**Date(s):**

**1.02 Business Courtesies Policy**

**BACKGROUND**

New York Downtown Hospital recognizes that there are legitimate and lawful reasons to accept or provide reasonable business courtesies. Specifically, there will be times when employees may wish to accept, from a current or potential business associate, an invitation to attend a social event in order to further develop business relationships or take advantage of educational opportunities. However, it is recognized that in healthcare, business courtesies pose a risk for conflict of interest or fraud and/or abuse related to anti-kickback laws and regulations.

**PURPOSE**

In recognition of these issues, this policy provides guidelines for accepting and providing business courtesies.

**POLICY**

1. These guidelines only pertain to relationships with individuals and entities outside New York Downtown Hospital. They do not pertain to actions between the organization and its employees nor actions among New York Downtown Hospital employees.
2. These guidelines do not cover gifts, (see New York Downtown Hospital Policy on Gifts)
3. Any business courtesies involving physicians, or other individuals or entities in a position to refer patients or services to the organization, must strictly follow corporate policies and be in conformance with all federal and state laws, regulations and rules regarding these practices.
4. Under no circumstances will an employee solicit business courtesies.

## **PROCEDURES**

### ***Receiving Business Courtesies***

1. Employees may accept invitations to social events in order to further develop business relationships; however, these events must not include expenses paid for any travel costs or overnight lodging. The cost associated with such an event must be reasonable and appropriate. This will mean that the cost will not exceed \$150.00 per person.
2. Employees may accept invitations to attend training, educational, or informational opportunities that may include travel and overnight accommodations. However, prior to accepting any such invitation, employees must receive written approval from a senior member of the New York Downtown Hospital management team. For the Chief Executive Officer, approval should come from the Chairman of the Board Audit and Compliance Committee.
3. Business courtesies that would influence, or appear to influence, an employee in the conduct of their duties or responsibilities must be declined.

### ***Extending Business Courtesies***

1. Employees may extend invitations to current or potential business associates to attend a social or educational event. THE PURPOSE OF THE EVENT MUST NOT BE TO IMPROPERLY INFLUENCE RELATIONSHIPS, BUSINESS OUTCOMES OR REFERRAL SOURCES.
2. During these events, topics of a business nature must be discussed and the host must be present.
3. Costs associated with such an event must be reasonable and appropriate and not exceed \$150.00 per person. These events must not include expenses paid for any travel costs or overnight lodging.
4. Such invitations must be infrequent with respect to any particular individual or entity, which, as a general rule, means not more than once every quarter.

## **RESPONSIBILITIES**

1. Any departures from this policy must be approved in writing by a senior member of the New York Downtown Hospital management team. For the Chief Executive

Officer, approval should come from the Chairman of the Board Audit and Compliance Committee.

2. Violations of this policy are to be reported to the Chief Compliance Officer.
3. The Chief Compliance Officer is responsible for investigation of violations of this policy, in consultation with legal counsel.

The Chief Compliance Officer is responsible for monitoring and updating this policy document.