

Conflict of Interest - Gifts

Updates Approved by Compliance Committee: 9.6.2023

Reviewed w/ No Changes: 9.4.2024; 9.3.2025

Revised:

Purpose:

Cayuga Health System is committed to an equitable purchasing policy based on demonstrated need, cost, and quality. Nothing in this policy should be considered in any way an encouragement to make, solicit, or receive any type of entertainment or gift.

Policy:

Recognizing the potential for conflict of interest does exist for employees, physicians, volunteers, and board members, the medical center, in an effort to avoid providing preferential treatment, has adopted the following policy regarding accepting or soliciting gifts, contributions, or free services from past, current, or potential vendors:

- 1) No employee may accept a gift of cash or cash equivalents (i.e. stock, bonds, etc.) at any time.
- 2) Gifts or contributions such as, but not limited to, the following may be accepted if conditions listed as items 3 and 4 of this policy are met:
 - Payments for or provision of meals
 - Subsidies for travel, lodging, hospitality or other expenses
 - Scholarships or other funds that designate or limit participation to selective employees or departments based on a vendor's relationship with that department or group of employees.
 - Equipment or capital items used in the provision of services
 - Personal gifts
- 3) No gift or entertainment may be accepted if it is clear the intent is to induce referrals or affect decision making by those employees in a position to make a decision about a vendor's products or services.
- 4) A \$100.00 per person, per vendor, per year limitation will be placed on items that employees can accept from vendors.

The intent of the policy is to deter a vendor from using inappropriate efforts to sway individuals to buy goods or services or make referrals. It is appropriate for vendors to give charitable gifts to the Health System in support of programs aimed at benefiting the general public.

This policy shall also apply to employees receiving gifts from patients, family members, community members, etc. Gifts shall be acceptable so long as the total value does not exceed \$100.00 per person per year. No cash, checks, or similar financial instruments may be accepted under any circumstances, though gift certificates that meet the monetary limit are acceptable.