

DEPARTMENT: Ethics and Compliance	POLICY DESCRIPTION: Approval of Tokens of Appreciation in Recognition of Volunteer Efforts from Non-Referral Sources
PAGE: 1 of 1	REPLACES POLICY DATED: 4/1/98; 6/1/98; 1/4/2002; 6/30/2002; 1/30/2004; 4/1/2005; 5/3/2005; 8/31/2005; 2/1/2006
EFFECTIVE DATE: April 1, 2008	REFERENCE NUMBER: EC.008
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All Company-affiliated Facilities including, but not limited to, hospitals, ambulatory surgery centers, home health agencies, physician practices, service centers, outpatient imaging centers, and all Corporate Departments, Groups Divisions and Markets.

PURPOSE: To establish the approval process for tokens of appreciation to non-referral sources in recognition of their volunteer efforts on behalf of the Company.

POLICY: The Code of Conduct is thorough on the subject of gifts and is to be considered the authority on giving and receiving gifts. The Code authorizes flexibility in giving gifts ("tokens of appreciation") to individuals in recognition of volunteer efforts on behalf of the Company. There must be a reasonable relationship between the time and effort extended by the volunteer and the value of the gift.

Tokens of appreciation may be given that are in excess of \$75 in value, to include gift certificates, to individuals who have made substantial, non-compensated time commitments to a facility, provided such individuals are non-referral sources. A Company employee must obtain the approval of his/her supervisor and facility Ethics and Compliance Officer (ECO) before giving such a token in excess of \$75 to a non-referral source in recognition of his/her volunteer efforts on behalf of the Company. Any token in excess of \$300 must also be approved by the SVP and Chief Ethics and Compliance Officer, except in those situations in which non-physician members of a facility's board of directors and/or their immediate family member(s) are to receive "tokens of appreciation" commensurate with those that physician members of the board and/or their immediate family members receive pursuant to the Reimbursement of Expenses and Extending Tokens Related to Voluntary Leadership Service by Potential Referral Sources Policy, LL.022.

If the aggregate taxable income (*i.e.*, tokens as well as any other compensation the facility might provide) provided by a facility to any member of the Board of Trustees, whether that person is a referral source or not, in a calendar year exceeds \$600, the facility must provide the Board member with an IRS Form 1099. A Board member who wishes not to receive taxable income may refuse to accept any tokens of appreciation.

Each Company-affiliated facility's ECO is responsible for overseeing implementation of this policy.

DEFINITION:

Non-referral sources is any individual other than those who are licensed as a doctor of medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of optometry, or a chiropractor.

REFERENCES:

Code of Conduct, Business Courtesies Section. Entertainment Policy, <u>EC.006</u> Business Courtesies to Potential Referral Sources Policy, <u>EC.005</u> Reimbursement of Expenses and Extending Tokens Related to Voluntary Leadership Service by Potential Referral Sources, LL.022