

	SECTION: Compliance	NO: CMP 006
	TITLE: Gifts	DISTRIBUTION: Corporate and all Facilities
Original Date of Issue: 08/01/14		Date of Approval:
Revised: 06/2023		

Scope:

All Team Members of Summit Behavioral Healthcare, LLC (Summit BHC), including facilities and their employees, independent contractors and professional staff, Summit Board of Managers (Summit BHC Board), and other individuals authorized to act on behalf of Summit BHC.

Purpose:

To establish parameters for the extension of gifts to, and the receipt of gifts from, individuals or organizations who have a business relationship with Summit BHC, its subsidiaries and affiliates.

Policy:

Team Members may not enter into any agreement or arrangement that calls for a commission, rebate, bribe, kickback, or other remuneration. Team Members must not offer or pay anything of value for patient referrals or other items or services payable by state or federal healthcare programs. Any payment Summit BHC offers to healthcare-providing referral sources are required to be at fair market value and without regard to referrals. Team Members, representatives and agents who make referrals to healthcare providers must do so in exclusive consideration of clients’ best interests and treatment. No consideration may be given to the value or volume of referrals any such healthcare provider has made to or received from Summit BHC, or of other items or services payable by state or federal healthcare programs. If a Team Member has any concern whether a gift or referral is appropriate under this policy, the Team Member should consult with his or her supervisor, the Chief Compliance Officer or the Compliance Department.

Procedure:

To avoid the appearance of impropriety when giving gifts to, or receiving gifts from, individuals or businesses who conduct business or are seeking to conduct business with Summit BHC or its Subsidiaries and affiliates, Team Members and immediate family members of Team Members may never accept, use or allow gifts or other gratuities and incentives to improperly influence relationships or business outcomes. Under no circumstances may a Team Member solicit, petition or lobby for a gift.

Receiving Gifts

1. No Team Member may solicit gifts, trips, or gratuities from clients or families. Team Members may retain gifts of nominal value from existing vendors upon approval from their supervisor.
2. Perishable or consumable gifts received by the facility or a department within the facility must be shared by the department and/or facility.
3. Team Members shall not accept gifts, favors, services, entertainment, or other things of value to the extent that decision-making affecting Summit BHC might be influenced and to the extent doing so violates local, state or federal laws and regulations or Summit BHC's policies.
4. During the course of normal business relationships, such as marketing and business development, Team Members may accept perishable or consumable gifts.
5. Team Members shall not solicit or accept excessive gifts, meals, expensive entertainment, or other offers of goods or services that exceed \$50. Examples of acceptable gifts would include promotional items such as pens, memo pads, t-shirts, or coffee mugs. Unacceptable gifts would include event tickets, gift certificates, cash, or travel.

Giving Gifts to Business Associates

The offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, government official, or other person by Summit BHC is absolutely prohibited. Any such conduct must be immediately reported to the Compliance Department.

Beneficiaries of Government Reimbursement Programs.

In accordance with Summit BHC policies and procedures and local, state and federal law and regulations, Summit BHC shall not offer or provide any gift, hospitality, or entertainment of more than \$15 individually and \$75 in the aggregate for a calendar year to any beneficiary of a government reimbursement program. Examples of permissible items include nominal marketing items such as pens, t-shirts, water bottles, etc.

Government Employees.

Summit BHC shall not offer any gifts or entertainment to any local, state or federal elected official or government employee.

Cash or Cash Equivalents.

Under no circumstances may Team Members offer, provide, or accept gifts of cash or cash equivalents (including gift cards or gift certificates).

Free or Discounted Goods.

1. Free or discounted goods may not be offered unless the item is preapproved by the Chief Compliance Officer and meets the following criteria:
 - a. Goods are not cash or cash equivalent.
 - b. Retail value of the goods is fifteen dollars (\$15) or less individually.
 - c. The aggregate value of such goods provided to the individual by Summit BHC during a calendar year does not exceed seventy-five dollars (\$75).
 - d. Goods are offered to referral sources on equivalent terms, irrespective of the referring party's identity and their long-term referring practices with Summit BHC.

F. Waivers of Coinsurance/Deductible.

Summit BHC and its Team Members shall not offer waivers of coinsurance or deductible amounts as part of any advertisement or solicitation. Summit BHC and its Team Members shall not routinely waive coinsurance or deductible amounts and shall only waive such amounts after determining in good faith that the patient is in financial need, or after making reasonable efforts to collect the cost-sharing amounts from the patient.