

Hamilton-Madison House, Inc.	
Compliance Program Policies and Procedures	
SUBJECT: Gifts and Benefits	
APPROVED BY: Lilya Berns	EFFECTIVE: November 20, 2024
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I. POLICY

Affected Individuals¹ of Hamilton-Madison House, Inc. (the “Agency”) may not engage, either directly or indirectly, in any corrupt business practice, including bribery, kickbacks or payoffs, intended to influence or reward favorable decisions of any patient, physician/practitioner, government representative, contractor, vendor, or any other person in a position to benefit the Agency or its employees.

Personnel are strictly prohibited from soliciting any gift or benefit, either individually or on behalf of the Agency. In addition, Affected Individuals may not offer, pay or receive any gifts or benefits to or from any person or entity: (i) that makes referrals to us, (ii) to which we make referrals, or (iii) with which we do business, under circumstances where the gift or benefit is offered, paid or received with a purpose of inducing or rewarding referrals of health care items or services, or other business between the parties. Affected Individuals are strictly prohibited from offering or giving any gifts or benefits to government employees or officials.

The guiding principle of this Policy is simple: Affected Individuals may not be involved with gifts or benefits that are undertaken: (i) in return for or to induce referrals, or (ii) in return for or to induce the purchasing, leasing, ordering or arranging (or the recommending of any of the foregoing) of any item or service.

This Policy applies to our interactions with providers who refer patients to us or to which we make referrals, and to our interactions with our vendors (including, but not limited to, medical supply companies from which we purchase). This Policy also applies to patients and potential patients.

For the purposes of this Policy, “gifts and benefits” include, but are not limited to, anything of value provided at no charge or at a discount. This includes, but is not limited to: cash, cash equivalents (e.g., checks, gift certificates, and stocks), prizes, meals, artwork, tickets to sporting or entertainment events, and sponsorship of recreational or social activities.

This Policy does not preclude the acceptance of items of nominal value, which are clearly tokens of friendship or business hospitality, such as fruit, cookies or candy that a vendor may provide during the holiday season that are shared among staff.

¹ “*Affected Individuals*” means all persons who are affected by the Agency’s “risk areas,” including our employees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

Gifts or benefits to spouses or immediate family members of Affected Individuals are not permitted. “Immediate family members” for purposes of this Policy includes any of the following: your husband or wife; birth or adoptive parent, child or sibling; stepparent, stepchild, stepbrother, or stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild.

II. PROCEDURE

To the extent that you have any question or concern regarding the applicability of this Policy to a particular circumstance, you are required to contact the Compliance Officer.

A failure to follow this Policy may result in disciplinary action in accordance with the terms of our Compliance Program.