



Standard Operating Policies – SOP # 12 Corporate Compliance - Gifts

Title:	GIFTS	Effective Date:	10/27/2003
Author:	Chief Compliance Officer	Last Review Date:	12/01/2021
Location:	All Locations	Last Revision Date:	12/01/2021
Functional Area:	ADMINISTRATION		

POLICY

Anti-kickback requirements prohibit the provision or acceptance of anything of value in exchange for the referral of patients or services covered by a federal or state health care program. However, Liberty Healthcare Corporation (Liberty) recognizes situations when staff may be offered gifts from business associates. Such gifts can pose a risk for conflict of interest or fraud and/or abuse related to anti-kickback laws and regulations. This policy is intended to provide clear guidelines for receiving, giving and refusing gifts from individuals and agencies outside Liberty to prevent any appearance of “kickbacks” or other potential conflicts of interest.

NOTE: These guidelines only pertain to relationships between Liberty personnel, external individuals and entities. It does not pertain to gifts and rewards from Liberty to its staff or gifts shared among Liberty staff. These guidelines also do not cover business courtesies.

PROCEDURE

1. Receiving Gifts.

Liberty Workforce are not permitted to receive a gift or money from a client, parent, guardian or family member of any of our clients.

However, Liberty’s Workforce may accept gifts with a total value of \$50.00 or less in any one year from any individual or organization. Perishable or consumable gifts given to a department or group may only exceed this limitation if the total does not exceed a value of \$50.00 per person. Workforce members may never accept cash or cash equivalents such as gift certificates. Workforce are prohibited from soliciting gifts. Any gifts that would influence or appear to influence a Liberty Workforce member in the conduct of his/her duties or responsibilities must be declined.

2. Giving Gifts.

Liberty Workforce members are not permitted to give a gift or money to a client, parent, guardian or family member of any of our clients.

Liberty Workforce members may provide gifts that do not exceed \$50.00 in value per year, per recipient, except as set forth above. However, gifts can never be given with the purpose of improperly influencing relationships, business outcomes or referral sources. Cash or cash equivalents such as gift certificates are always prohibited.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	10/27/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed added no gifts from client/parents. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, Policy Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, minor changes. Added inactivity lock requirement