



POLICY TITLE: Acceptance of Honorariums by Employees

Responsible Department: Audit and Compliance

Creation Date: *Prior to 1/2004*

Review Date: Wednesday, January 31, 2018

Revision Date: 5/23/2025 3:38:49 PM

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PUBLISHED (Released): Friday, September 05, 2025 12:00:00 AM

SUMMARY & PURPOSE:

This policy is intended for all employees in order that they may understand, identify, manage and appropriately disclose those transactions which could result in an actual, potential or perceived conflict of interest.

POLICY:

On occasion, employees of Baptist Health South Florida, Inc. ("BHSF") are offered an honorarium (an ex gratia payment) to speak at a meeting, conference or other gathering. In order to reduce the appearance of any improper influence on purchasing or vendor selection decisions, BHSF has developed the following policy on the acceptance of honorariums by employees.

Management Employees-

Members of management (manager or higher) may not accept honorariums.

Non-Management Employee-

Non-management employees are permitted to accept honorariums (including payment or reimbursement of reasonable travel related expenses) as long as the arrangement is approved in advance by the employee's manager (manager or above) and is on the employee's own time (e.g. non-working hours or PTO).

SCOPE/APPLICABILITY:

All employees of Baptist Health South Florida.

Policy 830 applies to physicians who are employed by Baptist Health or its affiliates in a clinical capacity and other than on an irregular shift basis, i.e. Baptist Health's eICU.

PROCEDURES TO ENSURE COMPLIANCE:

Management Employees

Should a manager be offered an honorarium, the manager may either decline payment or suggest the honorarium be made payable to the appropriate entity's Foundation.

Non-Management Employee

The employee should submit a conflict of interest disclosure form (see Policy 827) prior to accepting the engagement. The disclosure should include the purpose of the presentation and the amount to be paid, including an estimate of the cost of any travel related expenses to be paid or reimbursed. Acceptable purposes for a presentation, with an offer of an honorarium, include continuing education, benchmarking, best practices and quality improvement activities. In no case should an employee accept the offer of an honorarium from a vendor or potential vendor if the employee is involved in the selection of a product which is offered by the vendor.

SUPPORTING/REFERENCE DOCUMENTATION:

Baptist Health South Florida's Code of Ethics

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 819 Code of Ethics Policy – Audit and Compliance
- BHSF Administrative Policy: 827 Employee Conflict of Interest Policy – Audit and Compliance
- BHSF Administrative Policy: 830 Employed Physicians' Outside Financial Relationships with Industry

ENFORCEMENT & SANCTIONS:

Enforcement of this policy will be performed by Baptist Health South Florida's Audit and Compliance Department. Failure to comply with or report a violation of a compliance policy can lead to disciplinary action up to and including termination.