



POLICY TITLE: Vendor-Sponsored Travel and Related Expenses

Responsible Department: Audit and Compliance

Creation Date: 4/02

Review Date: 7/08, 01/19, 01/20, 01/21, 01/22, 01/23

Revision Date: 11/12, 1/17, 2/18

SUBMITTED BY (AUTHOR): Beth Gillis

Title: Corporate Assistant Vice President, Compliance

APPROVED BY: Wendy Kemp

Title: Corporate Assistant Vice President, Audit

APPROVED BY: Karen Brady

Title: Corporate Vice President and Chief Compliance Officer

PUBLISHED (Released): 01/06/2023

SUMMARY & PURPOSE:

In order to avoid the appearance of impropriety, and to ensure that all decisions regarding vendor and product selection are in the best interest of the organization, Baptist Health South Florida does not permit vendor-sponsored travel. This policy is intended to guide employees when such travel and other entertainment are offered by a vendor or potential vendor.

POLICY:

Baptist Health South Florida ("BHSF") recognizes that it is frequently necessary for employees to travel for business purposes. Therefore, it is BHSF's policy to pay for an employee's legitimate, reasonable and budgeted business travel if done in accordance with Policy BHSF 27.00 *Travel, Business Meals, and Business Entertainment and Other Social Events*.

This policy is not intended to prohibit non-management employees from accepting an honorarium (which may include reimbursement for reasonable travel related expenses) under limited circumstances pursuant to Policy BHSF 829 *Acceptance of Honorariums by Employees*.

This policy is also not intended to preclude BHSF from negotiating a price concession (or other appropriate reimbursement), in the final contract, for travel expenses incurred during the selection process.

SCOPE/APPLICABILITY:

All employees of Baptist Health South Florida.

PROCEDURES TO ENSURE COMPLIANCE:

On occasion, a vendor or potential vendor will offer to pay for an employee of BHSF (or a member of their immediate family) to attend an educational program, seminar, user group, speaking engagement, promotional program, meeting, site visit or other activity. Employees and their families may not accept the offer to pay for travel, lodging

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

or registration fees associated with any educational program, site visit, or other meeting. If the business purpose (site visit, speaking engagement, etc.) is appropriate, Baptist Health will pay for an employee's travel in accordance with Policy BHSF 27.00. If for the convenience of the employee, vendor owned transportation is used (e.g. company jet, vendor owned accommodations, etc.), the traveling employee must ensure that the vendor is reimbursed for the fair market value of the transportation and lodging. This policy is also intended to reduce the vendor's cost of selling goods and services, and therefore the cost of health care to the ultimate consumer/payer. This does not preclude an employee from accepting free travel to speak at or participate in an approved meeting if the travel is paid by a professional, membership or ownership organization or other non-vendor (e.g. AHA, FHA, Premier).

We recognize that there will be times when an employee may wish to accept from a current or potential vendor an invitation to attend a social event, meals or entertainment while traveling. The cost associated with such an event must be reasonable, appropriate and in compliance with the BHSF Code of Ethics. As a general rule, this will mean that the cost will not exceed \$150.00 per occurrence with an annual aggregate of \$300.00 from any one source. This policy is also not intended to preclude employees from attending charitable or fund raising events on behalf of BHSF as long as travel and lodging expenses are not paid by a vendor or potential vendor.

Should a vendor or potential vendor wish to advance the knowledge of our employees in a particular field, an educational grant may be made to the appropriate entity's Foundation. While the grant may be designated for a particular area of specialty, the vendor may not specify the particular program to be attended or the employee to attend. When the appropriate Vice President determines the best use for the educational grant, the usage must not be related to a specific vendor's product and must be a program with a substantial amount of educational content. Contributions may also be made directly to the Foundation's general medical education program fund or endowment fund to sponsor various physician education symposia and programs.

Questions on this policy may be directed to the Audit and Compliance Department.

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: 829 Acceptance of Honorariums by Employees Policy – Audit and Compliance
- BHSF Administrative Policy: 27.00 Travel, Business Meals, and Business Entertainment and Other Social Events Policy and Reimbursement Procedure

ENFORCEMENT & SANCTIONS:

Enforcement of this policy is the responsibility of the Audit and Compliance Department working in conjunction with the Human Resource Department. Failure to comply with or report a violation of a compliance policy can lead to disciplinary action up to and including termination.