

UConn HEALTH

POLICY NUMBER 2003-34
October 13, 2015

POLICY: GIFTS TO UCONN HEALTH EMPLOYEES

POLICY STATEMENT:

All UConn Health employees are State of Connecticut employees and, therefore, will adhere to the policies and procedures of this institution and to the State Code of Ethics for Public Officials and State Employees with regard to the acceptance of gifts.

DEFINITIONS:

Gift: Anything of value that you directly and personally receive unless you pay for the item.

Gifts to the State: Goods or services provided for use on state property or that support an event and which facilitate state functions.

Major Life Event:

- Birth or adoption of a child
- Wedding or civil union
- Funeral
- Ceremony for induction into religious adulthood (such as bar mitzvah or confirmation)
- Retirement from public service or state employment

Restricted Donor: Any individual or entity that is:

- Doing or seeking to do business with the University
- A registered lobbyist or a lobbyist's representative. A list of registered lobbyists can be found on the Office of State Ethics (OSE) website at: <http://www.ethics.state.ct.us>
- A contractor pre-qualified by the Connecticut Department of Administrative Services (DAS). Information is located on the DAS website at: <http://www.das.state.ct.us/>

ACCEPTANCE OF GIFTS:

In general UConn Health employees may not accept gifts, discounts or gratuities of any kind from a restricted donor.

If an individual is offered a benefit from someone other than a restricted donor (including patients) one of the following apply:

1. If offered because of the individual's position at UConn Health he/she may accept up to a total of one hundred dollars (\$100) annually from a single source.
2. If the offer has nothing to do with the individual's UConn Health position (e.g. a gift from one's best friend from kindergarten) there is no limit on the amount the employee may accept.

Supervisors and subordinates (including anyone within the chain of command) may only accept gifts from one another valued at less than one hundred dollars (\$100) *per gift*. Supervisors and subordinates may not pool their money to give a collective gift valued at more than \$99.99, except in the case of a major life event. There is no limit on the number of gifts per year. There is no limit on the value of a gift an employee may receive from an individual outside of the chain of command (i.e. a co-worker not in the employee's reporting structure).

UConn Health employees are individually accountable to ensure they comply with all gift limits under the State Code of Ethics. Employees are responsible for tracking the total value of gifts, including food and beverage, received from each restricted donor during a calendar year to ensure the gift limits are not exceeded. Questions or concerns about whether a gift may be accepted according to the State of Connecticut Code of Ethics may be clarified by the UConn Health Ethics Liaison or by the OSE. Reports of potential violations of the State Code of Ethics should be made to the UConn Health Ethics Liaison or directly to the OSE.

EXCEPTIONS TO GIFT RULES:

The following are examples in which the acceptance of a gift is permitted. This list is **not** all-inclusive:

1. "Gifts to the State" including goods and services that allow for employee participation at an event (e.g. conference, site tour, training) provided the participation is relevant to one's UConn Health duties and is comprised of goods and services that the State would normally procure if funds were available;
2. A certificate, plaque or other ceremonial award costing less than one hundred dollars (\$100);
3. A rebate, discount, or promotional item available to the general public;
4. Printed or recorded informational material germane to UConn Health action or functions;
5. Food or beverage or both, costing less than fifty dollars (\$50) total per recipient in a calendar year. The food or beverage must be consumed on an occasion(s) at which the donor or donor's representative paying, directly or indirectly, for the food or beverage is in attendance. Employees must keep in mind who is really paying the bill. If a specific vendor has multiple representatives working in the state, the vendor is considered the restricted donor and the fifty dollar(\$50) limit applies to the total of all food and beverage accepted from that vendor, no matter which representative is providing the food/beverage;
6. A gift including but not limited to, food or beverage or both, provided by an individual for the celebration of a major life event. This exception may be used only by registered lobbyists and UConn Health supervisors/subordinates. Other restricted donors may not use this exception. The maximum gift value under this exception is \$1000;
7. Admission to a charitable or civic event, including food and beverage provided at such event, but excluding travel or lodging expenses, at which a UConn Health employee participates in his official capacity, as long as the admission is provided by the primary sponsoring entity;
8. Anything having a value of not more than ten dollars (\$10), provided the total value of all things provided by a donor to a recipient in any calendar year does not exceed fifty dollars (\$50). Examples include items such as pens, mugs or notepads provided by a vendor at a conference;
9. Training for a product purchased by UConn Health as long as the training is provided to all customers of that vendor.

GIFTS FROM PATIENTS:

While gifts valued at up to one hundred dollars (\$100) from patients to individuals are acceptable, the following alternatives are also permitted:

- An item for a particular department such as a piece of equipment or a reference book;
- A donation to UConn Health or recognized charity (if donation is made in an employee’s name, that individual may not claim the charitable tax deduction);
- A gift of flowers or food to be shared among staff members.

REFERENCES:

University Guide to the State Code of Ethics Revised February, 2014:

<http://policy.uconn.edu/2011/05/24/guide-to-the-state-code-of-ethics/>

Connecticut General Statutes Chapter 10, Part I, § 1-79 – 1-89a:

<http://www.ct.gov/ethics/cwp/view.asp?a=2313&q=432632>

University of Connecticut Code of Conduct:

<http://policy.uconn.edu/2011/05/17/employee-code-of-conduct/>

Office of State Ethics:

<http://www.ethics.state.ct.us>

UConn Health Ethics Liaison – contact liaison at <mailto:compliance.officer@uchc.edu>

Iris Mauriello (Signed)

10/20/15

Iris Mauriello
Compliance Integrity and Privacy Officer

Date

Andrew Agwunobi (Signed)

10/27/15

Andrew Agwunobi, M.D., M.B.A.
Interim Executive Vice President for Health Affairs

Date

New Policy: 10/1/03

Revised: 10/13/15