

TITLE: Business Courtesies Policy	POLICY DESCRIPTION: Business Courtesies Extended by HPG to Others
PAGE: 1 of 2	TYPE: Compliance and Ethics
EFFECTIVE DATE: August 1, 2004	REFERENCE NUMBER: HPG.005

<p>SCOPE: All HPG Colleagues in all HPG departments.</p>
<p>PURPOSE: To establish parameters for the extension of business courtesies to Vendor representatives, potential members, potential referral sources to HPG member healthcare providers, and other business contacts, and their immediate family members.</p>
<p>POLICY:</p> <p>There may be times when an HPG colleague wishes to extend to a current or potential business associate an invitation to attend a social event (<i>e.g.</i>, reception, meal, sporting event, or theatrical event) to further develop a business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general rule, this means the cost will not exceed \$100.00 per person. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four times per year. Nothing in this policy permits any business courtesy or other benefit that is understood by either party to be offered or provided as an inducement to enter into any business relationship nor may a business courtesy be extended to a business contact who solicits it.</p>
<p>DEFINITIONS:</p> <p>Business Contact - Any representatives for Vendors, potential members, existing members, and potential referral sources to HPG members.</p> <p>Business courtesies include gifts and entertainment. They include items of value given to another free of cost, as well as social events sponsored or hosted by HPG such as meals, sporting events, theatrical events and receptions. Examples in the Procedure Section of this Policy further elaborate on what is and is not included in this definition.</p>
<p>HPG Colleague or Colleagues:</p> <ol style="list-style-type: none"> 1. Employees of HCA Management Services, LP who work full-time or part-time for HPG under a management contract; and 2. Clinical Committees and Advisory Board Members: individuals who either work full-time or part-time for HPG or are HPG member employees, and who participate on any advisory board or clinical committee for HPG.

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Immediate family member includes: husband or wife; natural 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.

Vendor – Any entity doing or seeking to do business with HPG.

PROCEDURE:

1. A HPG colleague may extend a business courtesy to a Business Contact and his or her immediate family members under the following conditions:
 - a. It is not cash or a cash equivalent (*e.g.*, checks or stock instruments);
 - b. It does not exceed \$100 in value for one event, it is infrequent (generally, not more than four times per year), and the total value of business courtesies extended to the same Business Contact and that Business Contact’s immediate family members do not exceed \$400 for the calendar year; and
2. The following are also **NOT** considered business courtesies.
 - a. A HPG colleague who has become friends with a Business Contact and who socializes with such individual(s) may personally pay for the cost of social events, provided the HPG colleague does not include this item as a business expense for tax purposes and not charge HPG or otherwise receive reimbursement from HPG to cover this expense.
 - b. A Business Contact who is also the spouse of a HPG colleague may attend, in his or her capacity as the Colleague’s spouse, social events to which spouses are invited, and such events do not count toward the \$400 business courtesies limit.
3. HPG’s ECO is responsible for overseeing implementation of this policy.

REFERENCES:

42 U.S.C. §1320a-7b; 42 U.S.C. §1001.952(a)-(a); 42 U.S.C. §1395 nn; 66 Fed. Reg. 856, 961-962 (January 4, 2001)
 HPG Code of Conduct, July 1, 2004
 HPG Business Relationship Statement, July 1, 2004