



University of Connecticut Health Center

POLICY NUMBER #2003-34

August 18, 2009

POLICY: GIFTS TO INDIVIDUALS

POLICY STATEMENT:

All University of Connecticut Health Center (UCHC) 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.

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

Regulated 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 UCHC employees may not accept gifts, discounts or gratuities of any kind from a regulated donor. If an individual is offered a benefit from someone other than a regulated donor (including patients) and the benefit is offered because of the individual's position at the Health Center he/she may only accept up to one hundred dollars (\$100) annually in the aggregate from a single source. 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. There is no limit on the number of gifts per year. 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.

UCHC employees are individually accountable for their acceptance of gifts for each calendar year. Concerns or questions about whether an item is acceptable according to State of Connecticut Code

of Ethics may be clarified by the University Ethics Liaison or by the OSE. Reports of violations of the State Code of Ethics should be made to the University 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. Goods or services which are considered “Gifts to the State” provided to UCHC for use on UCHC property or that support an event and which facilitate state actions or functions. This exception does not include payments provided to employees to attend a conference, symposium, or other event;
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 UCHC action or functions;
5. Food or beverage or both, costing less than fifty dollars (\$50) total per recipient in a calendar year, and consumed on an occasion(s) at which the person paying, directly or indirectly, for the food or beverage, or his representative, 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, but the food and beverages are ultimately paid by that same vendor the fifty dollar(\$50) limit applies to the total of all the meals;
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 does not extend to events that occur on an annual basis such as birthdays or anniversaries. Only registered lobbyists may use this exception; other regulated donors may not use this exception. UCHC supervisors and subordinates may also use this exception. The maximum gift value under this exception is \$1,000;
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 UCHC 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 aggregate 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 UCHC as long as the training is provided to all customers of that vendor.

NECESSARY EXPENSES:

UCHC employees may receive compensation for necessary expenses only if, in their official capacity as state employees, they actively participate in an event, give a speech or presentation or facilitate a workshop. Necessary expenses are limited to necessary travel expenses (excluding first class), lodging for the nights before and/or after the appearance, meals, and related conference fees. If necessary expenses are paid by an outside entity other than a state or federal government, employees must file an ETH-NE form with the OSE within 30 days of receiving payment or reimbursement. The ETH-NE form can be found on the OSE website.

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 the Health Center 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.

Iris Mauriello (signed)

9/23/09

Corporate Compliance Integrity and Privacy Officer

Date

Cato T. Laurencin (signed)

10/1/09

Vice President for Health Affairs

Date

REFERENCE:

University Guide to the State Code of Ethics Revised July, 2009:

<http://www.audit.uconn.edu/doc/codeofethics.pdf>

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://www.audit.uconn.edu/doc/codeofconduct.pdf>

Office of State Ethics: <http://www.ethics.state.ct.us>

“Report of Necessary Expenses” (ETH-NE) form: [ETH-NE form](#)

University Ethics Liaison – contact liaison at ethics@uconn.edu

NEW POLICY: October 1, 2003