



POLICY TITLE: Professional Courtesies	SYSTEM POLICY AND PROCEDURE MANUAL
POLICY #: 800.16	CATEGORY: Compliance and Ethics
System Approval Date: 9/6/18	Effective Date: 04/2016
Site Implementation Date: 10/16/18	Last Reviewed/Approved: 04/2016
Prepared by: Corporate Compliance Office	Notations:

GENERAL STATEMENT of PURPOSE

The purpose of this policy is to establish parameters regarding Professional Courtesies to employees, practitioners and their family members to ensure that any such courtesies comply with Northwell Health’s policies and all applicable laws and regulations.

POLICY

It is the policy of Northwell Health not to allow Professional Courtesies to employees, Practitioners and any of their Family Members.

SCOPE

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Donald and Barbara Zucker School of Medicine at Hofstra/Northwell conducting research on behalf of the Zucker School of Medicine on or at any Northwell Health facility; and the faculty and students of the Hofstra Northwell School of Graduate Nursing and Physician Assistant Studies.

DEFINITIONS

Family Member: means any family member and includes, but is not limited to, husband or wife; birth 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, uncle, aunt, cousin, grandparent or grandchild; and spouse of a grandparent or grandchild.

Practitioner: means a licensed or registered doctor of allopathic medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of

optometry, a chiropractor, a nurse, a mid-wife, physician assistant, physical therapist or optometrist.

Professional Courtesies: means the provision of free or discounted health care items or services to an employee, Practitioner or their Family Member(s) unless the patient qualifies for financial need pursuant to Policy 300.20 – Financial Assistance Program.

PROCEDURE

In order to comply with the Federal Ethics in Patient Referrals Act (also known as the Stark law) and related regulations, Northwell Health prohibits the extension of Professional Courtesies to employees, Practitioners and their Family Members.

ENFORCEMENT

Hospital and site managers and Department Chairs shall be responsible for helping to enforce this policy. All violations must be reported to the Office of Corporate Compliance for appropriate resolution.

REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES

- 42 U.S.C. § 1320a-7b
- 42 U.S.C. § 1395nn
- 42 C.F.R. §§ 411.350-357(s)
- N.Y. Pub. Health Law § 238-a
- Northwell Health Corporate Compliance Policy #800.04–Gifts and Interactions with Industry
- Northwell Health Corporate Compliance Policy #800.10–Business Courtesies to Potential Referral Sources
- Northwell Health Finance and Purchasing Policy #300.20–Financial Assistance Program

CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES

N/A

ATTACHMENTS

N/A

FORMS

N/A

APPROVAL:	
Northwell Health Policy Committee	7/26/18
System PICG/Clinical Operations Committee	9/6/18

Standardized Versioning History:

*= Northwell Health Policy Committee Approval; ** =PICG/Clinical Operations Committee Approval

*3/31/16; **4/21/16

*6/28/18 Provisional