

ADMINISTRATIVE POLICY

Acceptance of Gifts Policy

Approval Authority: Vice Chancellor for Finance
Responsible Administrators: Controller
Responsible Office: Controller's Office
Policy Contact: Controller

Originally issued:
January 2019

**Current version
effective as of:**
January 2020

POLICY STATEMENT/REASON FOR POLICY

The Vanderbilt University strives to maintain the highest standards of ethical conduct in its dealings with its business associates, including vendors and potential vendors, customers and business partners. Acceptance of gifts may create conflicts of interest and has the potential to influence decisions. University employees, and their immediate family members, are prohibited from receiving gifts from outside organizations, vendors or individuals, with the few exceptions that are noted below.

This policy does not apply to gifts to the university through our fund-raising efforts.

THIS POLICY APPLIES TO

This policy applies to all Vanderbilt Finance employees.

POLICY

- A. Employees are expected to uphold the integrity of the institution while conducting business with outside organizations, vendors and individuals. All employees are expected not to compromise any business transaction, even in appearance, in exchange for personal benefit such as gifts.
- B. Federal regulations, which govern procurement under contracts and grants, impose a like prohibition mandated by Public Law 99-634, known as the "Anti-Kickback Enforcement Act of 1986." "Kickback" is defined as any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind that is provided by a supplier, directly or indirectly, to any employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with procurement under a federal contract or grant.
- C. Promotional items of insignificant value, of an advertising nature, an occasional business meeting meal, or other items of small value may be accepted. Gifts outside of these guidelines would be deemed unacceptable and shall be declined or returned if already accepted.
- D. Vanderbilt employees can accept the following:
 - 1. A plaque or an award.
 - 2. Items of insignificant value that are given to everyone (such as key chains, T-shirts, coffee mugs, pens, bags).

3. Information materials that are provided by vendors to everyone (such as booklets, audio or video tapes).
4. Non-cash raffle prizes or drawings at a conference or similar event where the employee is representing the university. (Any cash prize must be used to offset the expenses associated with the event/conference.)
5. An occasional business meal. Repetitive mealtime meetings should be discouraged. Meals associated with pure entertainment, where university business is not being discussed, are not considered business meals.
6. Plants, food or holiday gift baskets may be accepted if shared with other departmental staff.
7. Travel paid at a vendor's expense, with prior approval from the department head, when associated with speaking at a conference or viewing a potential vendor's site.

It is permissible to accept meals and lodging, and participate in social events, at conferences conducted by Vanderbilt business associates.

An employee should consult with his/her supervisor if there is uncertainty of the appropriateness of accepting a gift.

DEFINITIONS

Employees - all permanent, part-time, temporary and contract Finance employees, including volunteers.

Gift - A tangible or intangible item of any value given to a Vanderbilt employee, directly or indirectly, from an external source. Gifts can be in the form of cash, gift certificates, tickets to sporting events, etc.

Immediate Family Members - An employee's spouse or domestic partner, children or children of spouse or domestic partner, siblings or siblings of spouse or domestic partner, parents or parents of spouse or domestic partner, or any person living in the same household.

CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this policy may result in loss of role privileges and enterprise system access, and/or performance action, up to and including termination of employment.

PROCEDURES

N/A

FREQUENTLY ASKED QUESTIONS

N/A

ADDITIONAL CONTACTS

Subject	Contact	Office	Phone
Acceptance of Gifts	Finance	Office of the Controller	(615) 343-6601

RELATED POLICIES/DOCUMENTS

N/A

HISTORY

Issued: January 2019

Reviewed: January 2020

Amended: January 2020

Procedures Website

N/A

FAQ Website

N/A