

## **POLICY**

Policy Name:	Solicitation and Literature Distribution					
Policy #:	8327.1007	Policy Dept.:	Human Reso	ources	Population:	⊠ Adult ⊠ Peds
Approval Authority:	Policy & Procedure Committee		Effective	8/20	Reviewed:	8/20
Responsible Executive:	Chief Human Resources Officer		Revised:			
Responsible Office:	Human Res	ources	Contact:	Human Resources		

### 1. Policy Statement

In order to have a safe, healing environment for patients, a professional work environment for associates, and thoughtful solicitation strategies to our stakeholders, Erlanger Health System ("EHS") has established the following policy to define which type of solicitations and by whom is permitted on its premises, through campus (e)mail or in the community.

- Erlanger Health System Foundations and the Volunteer Auxiliary (collectively "EHSF") are EHS's
  only authorized charitable organizations. EHSF strives to strategically utilize philanthropic
  stakeholders (donors) to meet their specific wishes and secure contributions that support EHS.
  To do this, EHSF shall review all solicitations to these stakeholders so as to avoid duplicate,
  inappropriate or untimely requests.
  - Charitable solicitations by anyone other than EHSF associates are not permitted on EHS premises or through EHS communication tools. Any exceptions will be made on a case-by-case basis and require prior approval by the EHS Sponsorship Committee.
  - Any charitable solicitations of third parties made on behalf of EHS by associates and volunteers must be coordinated through EHSF.
  - EHS associates should not accept monetary donations on behalf of EHSF, but instead direct the donor to reach out to EHSF. A monetary donation is defined as cash, check, credit card or gift card.
- A charitable solicitation made on behalf of Non-EHSF organizations is not permitted on EHS
  property or using EHS Communication tools unless an exception has been granted by the EHS
  Sponsorship Committee. EHS recognizes the value of charitable organizations and encourages
  employees and its visitors (patients, patient families, vendors and donors) to be active
  participants in such organizations and community activities outside of EHS.
- Commercial solicitations are only permitted with approval, coordination, and communication through the Human Resources department.
- Employees found to be soliciting or distributing literature in violation of this policy will be subject to disciplinary action up to and including termination.
- Trespassers violating this policy who have no affiliation with EHS will be removed from the property, given trespass warnings not to return, and may be subject to arrest and prosecution.

## 2. Who Should Read This Policy?

All EHS associates, volunteers acting on behalf of EHS and EHSF and other persons on EHS premises

#### 3. Purpose

To establish Erlanger Health System's ("EHS") intent:

- to have a campus that is free from solicitation efforts that do not relate to EHS's business or interest
- to have authorized entities making solicitations

#### 4. Definitions

<u>Charitable solicitation</u>- A request for money, goods, services, or support of a cause for the benefit of a non-profit organization including fundraisers for schools and churches.

<u>Commercial solicitation</u>- Any non-charitable solicitation, including but not limited to offering goods or services for sale; distributing advertising materials, circulars or product samples; political campaigning; engaging in outside business interests; canvassing; or soliciting memberships.

<u>Donation</u>- Monetary gifts, sponsorships, in-kind donations of goods/services and other forms of support that involve an exchange of material value.

<u>Donor-</u> Individuals, Foundations, Organizations, Businesses, Governments or other entities ("Donor") providing financial support, goods, or services for the benefit of EHS. Donors play an important role in allowing EHS to fulfill its mission to heal.

<u>EHS Communication tools</u>- EHS computer and communication systems and materials, including inter-department mail, bulletin boards, e-mail, intranet, telephone, fax, supplies, or other related EHS resources.

<u>EHS Community Sponsorship-</u>EHS will sponsor select community events throughout the year. Entities interested in requesting an EHS sponsorship should be directed to <u>www.erlanger.org/about-us/sponsorships</u> for additional information.

EHS Sponsorship Committee (the "Committee")- The Committee will be made up of representation from the Marketing, Diversity, Human Resources, Legal and Foundation departments. This committee will determine which Non-EHS Charitable Solicitations will be allowed on EHS property and will recommend to Executive Leadership which community events EHS should sponsor.

<u>Employee Assistance Fund-</u> The Employee Assistance Fund is an EHSF fund. Funds are distributed at the discretion of a committee. See the 'Employee Help Fund' policy for more details. A donor giving to this fund is unable to restrict which employee should benefit from their gift.

- To apply for the Employee Assistance Fund, the employee should fill out the Employee Help Fund Application and return to Human Resources.
- To give to the Employee Assistance Fund, the employee should log into PeopleSoft and initiate a
  one-time or recurring payroll gift to the Employee Assistance Fund or contact EHSF main office
  (423-778-6600) to get instructions on how to make a cash, check or credit card donation. See
  References for instructions on how to setup a payroll deduction.

Non-EHSF Charitable Solicitation Application-Application to request one-time permission to promote a non-EHSF charity. (See Appendix A)

- Applications are accessible on the intranet.
- Applications should be submitted no later than the first day of the quarter prior to the quarter the solicitation would occur (i.e. if the request is to solicit in December/Qtr 4, the application should be submitted by July 1st to be considered).
- Applications should be submitted via email to foundation@erlanger.org.
- Incomplete information will void the application request.

- Applications will be considered by the Committee on the following criteria:
  - Nonprofit's reputation
  - o Nonprofit's mission and whether it aligns with EHS's mission
  - Any potential conflicts with EHSF fundraising initiatives
  - Any concerns around the requested timing and methods of solicitations requested
  - Previous time(s) nonprofit allowed to solicit
- When an application to solicit is granted, the Committee will notify the requestor on:
  - o The granted length of solicitation
  - The allowed solicitation method(s)

<u>Third Party event</u>- Any persons and/or organizations desiring to conduct an event or promotion that involves the use of the EHSF, EHS or Children's Hospital at Erlanger name for fundraising and/or publicity efforts must complete the EHSF Special Event and Fundraising Application/Agreement located on the internet at www.erlanger.org/foundations/erlanger-host-a-fundraiser.

<u>Working time</u>- Time when an associate is scheduled and expected to be engaged in performing his/her work tasks. It includes the associate doing the soliciting or the associate to whom the soliciting is being directed. Working times does not include breaks or mealtimes.

#### 5. The Policy

#### CHARITABLE SOLICITATIONS

- I. EHSF Authorized Charitable Giving Campaigns, Fundraising Events and Third Party Events
  - a. EHSF may promote these initiatives on EHS premise and using EHS communication tools.
  - b. EHSF reviews and approves all third party events prior to promoting.
- II. EHSF Solicitations by EHS Associates- Associates may assist in a solicitation when they have received prior approval from EHSF and the solicitation is for established charitable funds within the foundation or pre-approved funding priorities (See Selection of Funding Priorities policy).
  - a. EHS associate or volunteers ("Requestor") should obtain approval for the solicitation from the Vice President with ultimate oversight for the program or service for which funds are being requested.
  - b. At least one month in advance of requested solicitation, requestor should forward their Vice President's approval and the following details regarding the request to EHSF via email at <u>Foundation@erlanger.org</u>:
    - i. Department Need/Purpose of ask (fund id when applicable)
    - ii. Donor name(s)
    - iii. Details of ask
      - 1. Gift Amount
      - 2. Type of Gift (Cash, pledge, in-kind)
  - c. EHSF will review the request and determine whether this specific solicitation is the best and highest purpose to serve the greater interests of EHS:
    - i. The EHSF Development team will consider current and future strategies in place for the specific donor and/or department, any conflict of interests that may arise with asking or receiving said donation, and whether the ask is in line with the List of Funding Priorities.
      - The EHSF Development team may involve other departments (ie. Compliance, Risk Management or Legal) if deemed necessary prior to granting approval.
      - 2. The EHSF President will determine whether specific need should be submitted during annual funding priorities review.
    - ii. EHSF Development team will document all requests and the ultimate decision made within the donor database.
      - 1. If approved, EHSF:

- a. Will work with the requesting individual/department to facilitate the solicitation of the gift through EHSF
- b. OR approve the requesting individual/department to proceed without EHSF involvement.
  - i. The requestor should advise donor to make monetary gifts directly to EHSF.
  - ii. If in-kind donation, EHSF will notify the requestor of the additional steps required to accept this type of donation.
- 2. If denied, requestor should not proceed with that specific solicitation. If an individual/department wishes to appeal the decision of EHSF, ultimate authority on the solicitation of donors is a decision of the Chief of Staff to the President and CEO and Chief Administrative Officer.
- III. Employee Assistance Solicitations- Associates are encouraged to support their co-workers in need (ie. House fire, death, etc.). To do so, associates should show support in one of the following ways:
  - a. Associate should give a gift directly to the co-worker in need.
  - Associate should give to and encourage their co-worker to apply to the EHS Employee Assistance Fund.
- IV. Non-EHSF Charitable Solicitations
  - a. Solicitation or distribution of literature of Non-EHSF Charities is not permitted for any reason in areas that are:
    - i. Clinical reception areas
    - ii. Immediate patient care areas
    - iii. Areas immediately adjacent to patient rooms
    - iv. Treatment areas
    - v. Thoroughfares frequently used to transport patients and visitors (The Medical Mall main level is an exception)
    - vi. Other areas where distribution would disrupt the delivery of healthcare services
  - b. Application and Review Process
    - i. All Non-EHSF Charitable Solicitation applications received by the first day of that quarter will be reviewed by the Committee. Applications will be reviewed in a consistent and non-discriminatory manner.
    - ii. The Committee will decide by the 8th week of that quarter whether permission to solicit for an entity other than EHSF is granted or denied.
    - iii. Requestors will be notified by the Committee via email if their request has been approved or denied.

#### **EHS SYMPOSIUM SOLICITATIONS**

- I. Symposiums are not EHSF charitable events, so all revenue and expense should be run through the cost center hosting the symposium.
- II. When soliciting vendors for sponsorships, departments should reach out to EHSF first to receive approval prior to solicitation. Departments should follow the same procedures as listed under bullet 5.CHARITABLE SOLICITATIONS I II. EHSF Solicitations by Associates to receive preapproval.

#### **EHS COMMUNITY SPONSORSHIPS**

I. The Committee will select which community events EHS will sponsor based on available budget and whether opportunity will provide programs and services that improve the wellness of individuals within the community.

#### **COMMERCIAL SOLICITATIONS**

- I. All inquiries regarding commercial solicitations should be directed to the Human Resources' Employee Relations department for prior approval.
  - a. Solicitation or distribution of literature for Commercial Solicitations is not permitted for any reason in areas that are:
    - i. Clinical reception areas
    - ii. Immediate patient care areas
    - iii. Areas immediately adjacent to patient rooms
    - iv. Treatment areas
    - v. Thoroughfares frequently used to transport patients and visitors (The Medical Mall main level is an exception)
    - vi. Other areas where distribution would disrupt the delivery of healthcare services
  - b. It is not appropriate for associates to use EHS's computers, intranet, email, telephone/faxes, equipment, paper and related supplies for personal uses at any time.
  - c. Employees cannot organize or setup tables and booths at any time on EHS property.
  - d. Door-to-door solicitation on Erlanger property is absolutely prohibited.
    - i. Normal business contacts with EHS officials by authorized representatives are not prohibited by this policy.
    - ii. Vendors approved for vending privileges to the EHS community may be permitted to sell their products at restricted locations on campus for a limited number of days per year, provided that they receive permission from the department of Human Resources.
    - iii. Vendors who have not been authorized to enter EHS property shall be considered trespassers.

#### Local Approval Committee(s) (as applicable)

Approved byTammy Cotter	Date8/19/20						
Approved by	Date						
Approved by	Date						
Medical Director Approval (as applicable)							
Approved by	Date						
Policy Committee Approval (as applicable)							
Approved by	Date						
Responsible Executive Approval From Final Approval Committee							
Approved byFloyd Chasse Date _	8/19/2020						
References:							

## **EHS Policy References**

- Conflict of Interest (8316.1164)
- Receipt or Extension of Business Courtesies (8316.1058)
- Business Courtesies to Potential Referral Sources (8316.1052)
- Selection of Funding Priorities (XXXX.XXXX)

## EHSF Policy Reference:

• EHSF Special Event and Fundraising Application/Agreement is located on the web at <a href="https://www.erlanger.org/foundations/get-involved/host-a-fundraiser">https://www.erlanger.org/foundations/get-involved/host-a-fundraiser</a>.

# Appendix A: Non-EHSF Charitable Solicitation Application

Reques	tor's Name <u>:</u>	Today's Date:
		Email:
		would you like to promote/solicit on EHS's campuses and/or
		ission aligns with EHS's mission
Provide	e 2-3 three reasons why	t is important for the committee to approve this request:
In whic	th time period would vo	ı like to promote/solicit this organization?
	ı J	
Which	solicitation method(s) v	ould you like to use?
		Application Guidelines
1.		submitted no later than the first day of the quarter prior to the
ว	quarter you would lik	
3.		applications should be emailed to <u>Foundation@Erlanger.org</u> . e reviewed by the EHS Corporate Sponsorship committee. The
<i>J</i> .		e and deny all requests.
4.	* *	ments should not begin solicitations until they have had a formal
		mittee to proceed with their request.
Internal i	use only:	