

Non-Monetary Compensation

Non-monetary compensation includes non-cash gifts and benefits provided by VUMC or its affiliates to a non-employed physician (or immediate family member) without charge or at less than fair market value. Examples include entertainment, gifts, meals, and continuing medical education credits.

\$452

Maximum dollar value allowed for non-monetary compensation for CY22

What is Permissible?

All non-monetary compensation should be of moderate cost and never to encourage or reward actual or potential health care referrals. However, the sharing of experiences, entertainment, food, and gifts with friends and colleagues is a natural outgrowth of human and professional interaction. The below outlines the legal limits for common interactions:

Permissible

- Charitable Events
- Gifts (flowers, gift baskets, and promotional items such as mugs, pens, etc.)

Not Permissible

- Non-Charitable Events (sports events, concerts, play, etc.)

Permissible with Limits

- Dining Out – permissible if the meal is provided in a setting conducive to discussing practice development
- Lunch for the Office – permissible if a VUMC representative is in attendance and the meal is consumed during a presentation or meeting
- Continuing Medical Education – permissible if generally offered to members of the VUMC clinical at large (one CME credit = \$25 per credit hour)

Reporting Non-Monetary Compensation

ALL non-monetary compensation provided to actual or potential referral sources (or their family members) must be reported using the [Non-Monetary Tracking system](#) so it can be tracked against the annual limit.

We encourage you to report non-monetary compensation in the NMT system prior to providing it so that you are aware of whether the item would result in exceeding the annual limit. If you have any concerns, you can always contact the Office of Compliance.

Reporting Exceptions

VUMC does not consider certain limited activity to be non-monetary compensation. These do not need to be reported via the Nonmonetary Tracker:

- Items or benefits that qualify as part of the Medical Staff Benefit Exception. This includes items or benefits that are: 1) valued at less than \$39 per occasion; 2) offered to all medical staff members practicing in the same specialty (or to all members of the medical staff); 3) reasonably related to provision of medical services at the hospital; and 4) for use on campus when engaged in activities that benefit the hospital or its patients (e.g., free parking, snacks in the lounge).
- CME credit awarded for Grand Rounds, Morbidity and Mortality Conferences, Tumor Board, Journal Club, and for compliance training.
- Efforts to recruit VUMC donors that are unrelated to clinical care or referral matters.

Personal Funds and Gifts

VUMC employees are not strictly prohibited from providing gifts to potential referral sources who may also be a friend or long-time colleague. These gifts do not need to be reporting via the Non-Monetary Tracker.

However, VUMC staff and business time cannot be used to facilitate personal gift-giving. Personal gifts provided to any patient or referral source may violate VUMC's Conflict of Interest and Commitment Policy or other VUMC restrictions.

Additional Resources

[Contact the Office of Compliance](#) if you have any questions at all about referral activity and reporting requirements.

For detailed scenarios and more information, see [VUMC's Non-Monetary Compensation FAQs](#).

[VUMC Policy: Benefits Provided to Non-Employee Physicians by VUMC and VWCH](#)
(see Guidelines, page 6)

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