



MOUNT SINAI HEALTH SYSTEM POLICY & PROCEDURE

Mount Sinai Beth Israel
Mount Sinai Brooklyn
Mount Sinai Hospital
Mount Sinai Morningside
Mount Sinai Queens
Mount Sinai West
New York Eye & Ear Infirmary

POLICY TITLE:	Entertainment Expense Policy		
POLICY NUMBER:	ACS-A.2021b	POLICY OWNER:	Finance
EFFECTIVE DATE:	4/1/2021	LAST REVIEWED DATE:	

INTRODUCTION AND PURPOSE

This policy governs what constitutes allowable expenses incurred by executives, faculty and staff of the Mount Sinai Health System for meals related to business development, recruitment, donor solicitation and guest lecturers (“Entertainment Expenses”). In each case, the Entertainment Expense must be appropriate to the situation and the nature of the institutional business conducted. Prudent business judgment and moderation should be exercised at all times and reimbursement will be limited to *allowable, reasonable, and appropriate* costs in furtherance of Mount Sinai’s¹ teaching, research and patient care missions and supported by the required documentation. This policy does not apply to expenses incurred that are not directly for the purpose of business development, recruitment, donor solicitation and guest lecturers. Thus, this policy does not authorize reimbursement for meals or other entertainment expenses at which only Mount Sinai employees are present or which are not specifically in furtherance of business development, recruitment or donor solicitation, or a guest lecture. Policies regarding reimbursement for other meals, including for example, reimbursement for meals while working or travelling must comply with the Travel and Meal Policy; any reimbursement whatsoever under a federal grant must also comply with that policy; and reimbursement for employee celebrations must comply with the Holiday Policy.

COMPLIANCE and DOCUMENTATION

A) All Entertainment Expenses:

- (a) Must be reasonable and customary for the area;
- (b) Must be substantiated with a specific business justification in writing;
- (c) Must be accompanied by a detailed receipt from the restaurant or other vendor— a credit card receipt alone is not adequate;
- (d) Must include a complete list of attendees and the affiliation of each attendee; and
- (e) If the amount per person exceeds \$100, a written justification must be provided.

Detailed receipts and documentation as set forth below must be submitted to the Departmental Administrator with the expense report for all expenses over \$25.00 or the expense will not be

¹ Mount Sinai as used in this policy includes: The Icahn School of Medicine at Mount Sinai; The Mount Sinai Hospital; Mount Sinai Morningside; Mount Sinai West; Mount Sinai Queens; Mount Sinai Brooklyn; Mount Sinai Beth Israel; New York Eye and Ear Infirmary at Mount Sinai; and the Mount Sinai Network.



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reimbursed. Completed reimbursement claims should be submitted with all required documentation within 30 days of the expense being incurred. **Any claims submitted more than 90 days after the expense is incurred will not be reimbursed.**

Entertainment Expenses incurred while entertaining referring physicians are subject to strict limitations in the Stark Law and must be reported to the Compliance Office. The Compliance Office will track these expenses across the health system on a referring physician by referring physician basis and provide monitoring. In addition, incurring Entertainment Expenses for the purpose of inducing patient referrals is never permitted.

All Entertainment Expenses are subject to audit and review by the Compliance Office for compliance with the standards and requirements of this and other institutional policies.

EXCEPTIONS TO POLICY

B) On occasion exceptions to this policy may need to be made when in furtherance of Mount Sinai's missions. Only the CEO, the Executive Vice President for Administration, Hospital President or the Dean (an "Authorized Executive"), are authorized to approve exceptions to any provision in this policy. Authorized Executives are not permitted to make exceptions for themselves; any requests for exceptions by an Authorized Executive must be approved by another Authorized Executive. All exceptions must be secured in writing, and in the usual circumstance, prior to the expense being incurred; must have a stated reason for the exception; and must be documented in the expense submission.

In the absence of such documentation, Mount Sinai may decline to reimburse the Entertainment Expense. If the meal costs are determined to be not reimbursable because they are excessive, Mount Sinai will reimburse the employee at the maximum allowable amount provided the requisite documentation is provided.