

IDENT	FIN-12
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Type of Policy:	Corporate
Sponsor's Department:	Finance
Title of Sponsor	CFO
Title of Approving Official:	CEO
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**SUBJECT: Clinician Stipends**

**1. Purpose of policy**

Vermont Information Technology Leaders, Inc. (VITL) is the recipient of Federal grant funds, the use of which is subject to certain Notices of Grant Awards (“NGAs”) and Health Human Services (“HHS”) grant administration regulations found in 45 C.F.R. Part 75—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR HHS AWARDS. The purpose of this policy is to compensate individuals who are in active medical practice for participating on VITL’s board of directors or VITL’s board committees. Health care clinicians who participate in VITL board or board committee activities during normal business hours forego the ability to perform and be paid for direct patient care services. As a result, to ensure that VITL benefits from the participation and input of direct health care clinicians, payment will be provided to compensate these individuals for loss of patient care revenue.

**2. Scope**

- a. This Policy shall be construed and applied to promote VITL’s compliance with the applicable Federal and State rules, regulations, and laws. In the event of a conflict between the provisions of this Policy and the requirements of an applicable state or federal statute or regulation, the applicable statute or regulation shall prevail.
- b. This policy allows VITL to compensate individuals who routinely provide direct health care to patients for participating on VITL’s board of directors or VITL’s board committees.
- c. This Policy sets forth internal guidelines for the benefit of VITL and its officers, directors, employees and agents, and does not confer any right or other benefit on any third party. The provisions of this Policy may not be used by any third party in any action or other proceeding against VITL or its interests.

**3. Program Guidelines**

- a. Responsibilities:
  - A direct healthcare clinician asked to serve on VITL’s board of directors or VITL’s board committees will be asked to perform the following:
    - i. Attest that they are involved in providing direct healthcare services and that by virtue of participating in these VITL activities, they will lose patient services revenue;
    - ii. Sign a VITL Conflict of Interest form;

- iii. Provide a W-9, Request for Taxpayer Identification Number (TIN) and Certification with box 3 marked for Individual/sole proprietor or single-member LLC and the individual's social security number in Part I.
  - iv. Provide documentation to VITL for approval which identifies the time spent involved in activities of the VITL board of directors or VITL board committees.
  - v. Maintain records demonstrating that time spent on VITL activities was separate from time spent with patients.
- b. Compensation:
- i. VITL compensation for such services is intended to be reasonable for the actual personal services rendered.
  - ii. Eligible Activities:
    - 1. Activities related to the VITL board of directors or VITL's board committees will be considered for compensation if they occur during normal business hours.
  - iii. Compensation will be as follows:
    - 1. VITL board of director activities
      - a. Compensation for time will be based on an hourly rate of \$125.00;
      - b. Reimbursement for in-state mileage will be at the approved State of Vermont rate as shown in Bulletin 3.4;
      - c. VITL will not compensate for any out-of-state travel.
    - 2. VITL board committee activities
      - a. Compensation for will be based on a flat stipend of \$300.00 for each event;
      - b. This stipend includes reimbursement for mileage; and separate/additional reimbursement for mileage will not be provided;
      - c. VITL will not compensate for any out-of-state travel.
    - 3. Compensation to any qualifying individual will not exceed an annual amount of \$15,000.00.
- c. Process:
- i. Individuals qualifying for compensation based on the above requirements will submit the required reimbursement form within 15 days of performing the approved activities to:
    - 1. VITL board of director activities: VITL President/CEO;
    - 2. VITL board committee activities: VITL CFO or VITL Vice President designated to provide staff support to the relevant committee.
  - d. VITL will pay individuals qualifying for compensation directly and will not make payment to a corporation or other entity for these services.
  - e. Any remuneration as described above accepted by a board or committee member will be reported to:
    - i. The IRS on Form 1099;
    - ii. The IRS on Form 990;
    - iii. The State of Vermont, DVHA in connection with required reporting of VITL expenditures.

#### **4. Policy Review & Approval**

VITL will review this policy annually and reserves the right to update this policy at any time to reflect VITL's intentions and compliance requirements.



Reviewed by: CFO

4/13/2017

Date



Approved by: CEO

4/13/2017

Date

**Approved by the VITL Board of Directors and effective April 10, 2017:**



Bruce Bullock, MD, VITL Board Chair