

 <b>Samaritan</b> Health 830 Washington Street Watertown, NY 13601	<b>Lobbying and Political Activity</b>		<b>Document No.</b> 3509
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<b>Business Units:</b>	Medical Center, Samaritan Home Health, Samaritan Keep Home, Samaritan Summit Village Assisted Living, Samaritan Summit Village Skilled Nursing, Centers and Clinics		

This Corporate Compliance Lobbying and Political Activity Policy is applicable to Samaritan Medical Center (SMC) and its Affiliates: Samaritan Keep Home, Samaritan Medical Practice, Samaritan Summit Village, and Samaritan Home Health (collectively, “Samaritan”).

#### **PURPOSE:**

To establish and communicate Samaritan’s policy on lobbying and political activities to ensure that Samaritan complies with the legal requirements of Section 501(c)(3) of the Internal Revenue Code.

#### **SUMMARY:**

As a tax-exempt 501(c)(3) organization, Samaritan is prohibited from participating in political campaigns, including directly or indirectly contributing to any political candidate, political party or political action committee, whether such contribution is financial or in kind.

#### **DEFINITIONS:**

**Affected Individuals** - All persons affected by Samaritan’s risk areas, including employees, the chief executive officer of SMC and other senior administrators, managers, and contractors, agents, subcontractors, independent contractors, and governing body and corporate officers of Samaritan, as appropriate.

**Lobbying or Lobbying Activity** – means any attempt to influence the passage or defeat of any legislation, rule or regulation by contacting, or urging the public to contact, members or employees of a federal, state or local legislative body for the purpose of proposing, supporting, or opposing such legislation, rule or regulation, or advocating the adoption or rejection of any legislation, rule or regulation. This also includes any attempt to influence the adoption, modification or rescission of an executive order or state agency regulation, or decision related to a governmental procurement contract.

**Political Activity** – means an activity directed towards the success or failure of a political party, candidate or partisan political group, and may take different forms, including, but not limited to:

- writing a check drawn on Samaritan’s account to a candidate, a candidate’s PAC, or a political party (including political party picnics, holiday parties, and galas);

- using Samaritan's resources (e.g., office supplies or using an employee's time during work hours) to support or encourage support for a candidate;
- allowing a candidate to use Samaritan's facilities to conduct any kind of political event, fundraiser, or other similar activity;
- associating Samaritan's name with a political event, fundraiser, or other similar activity;
- preferentially allowing a candidate use of Samaritan's premises for speeches and the like;
- allowing the placement of signs for or against a candidate on Samaritan's property;
- distribution of printed materials, leaflets, buttons and other political items on Samaritan's property; and
- criticism or support of a candidate on Samaritan's website or through links to another website.

### **POLICY:**

It is the policy of Samaritan to refrain from engaging in any activity which may jeopardize the tax-exempt status of the organization, including lobbying and political activities. Accordingly, no organization resources may be used to support or oppose a political candidate, party, organization, or committee in violation of applicable law. Affected Individuals may not use Samaritan's funds, time, equipment, property, or assets to campaign for or against any political candidate, or to engage in a lobbying activity. Neither may Affected Individuals identify themselves as representatives of Samaritan in any political or lobbying activity or in any contact with the news media.

### **PROCEDURE:**

1. Samaritan expects Affected Individuals, as applicable, to refrain from engaging in any activity that may jeopardize Samaritan's tax-exempt status. No Affected Individual may make any agreement on Samaritan's behalf to contribute any money, property, or services to any political candidate, party, organization, committee or individual in violation of any applicable law. Affected Individuals may personally participate in and contribute to political organizations or campaigns, but they must do so as individuals, not as representatives of Samaritan, and they must do so on their own time and use their own funds. Further, any political activities must not be conducted on Samaritan property.
2. Where its experience may be helpful, Samaritan may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that have a relationship to the operations of Samaritan when Samaritan's experience contributes to the understanding of such issues. However, neither of the foregoing may be done without approval from the President and CEO of SMC.

3. Samaritan has many contacts and dealings with government bodies and officials. All such contacts and transactions shall be conducted in an honest and ethical manner. Any attempt to influence the decision making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited. Any requests or demands by government officials or representatives for any improper benefit should be immediately reported to the Chief Compliance Officer, or in the case of Samaritan employees, reports may also be made to the Department Director or Manager, who shall be responsible for reporting the same immediately to the Chief Compliance Officer.

If at any time you have any questions or require further information on whether the scope of any political or lobbying activities may be prohibited, you may contact the Chief Compliance Officer at 315-779-5186, or a member of the Compliance Oversight Committee or Compliance Core Groups for further guidance.

**REFERENCES:**

Internal Revenue Code

**RELATED POLICIES:**

Administrative Bylaws

**REVIEWED AND REVISED:** 1/7/2022; 2/20/2023