I. Policy Statement
   a. This policy establishes requirements to ensure fundraising initiated on behalf of MU Health is institutionally appropriate, protects patient privacy, avoids duplication and undue solicitation of donors in our fund activities, and preserves procurement policies and relations with our suppliers of goods and services.
   b. This policy shall apply to any solicitation of charitable gifts from individuals, corporations, suppliers, groups and foundations which may or may not be related to MU Health Care or any of the health system campuses, divisions, departments or other subdivisions.

II. Definitions
   a. “Fundraising” means those activities specified in 45 CFR § 164.514(f)(1). All charitable fund raising initiatives must have approval from the MU Health Development Office and Senior Administration.

III. Process/Content
   a. Per UM System Collected Rules and Regulations section 30.040, the Curators of the University of Missouri and the President of the University of Missouri System are the only authorities that can accept gifts on behalf of the University. The receipt of a gift by an employee of the University does not constitute acceptance and is conditional, pending acceptance by the Board or President.
   b. MU Health may use, or disclose to a business associate or to an institutionally related foundation, the following Protected Health Information (PHI) for purposes of raising funds for its own benefit, without an authorization meeting the requirements of patient authorizations (sec. 164.514(f)):
      i. Demographic information relating to an individual, including name, address, other contact information, age, gender, and date of birth;
      ii. Dates of health care provided to an individual;
      iii. Department of service information
      iv. Treating physician;
v. Outcome information; and
vi. Health Insurance status.
vii. Patients are made aware of this allowance through notification in the MU Health Notice of Privacy Practices document.

c. Release of any other PHI requires individual authorizations to use or disclose. In order to release patient or enrollee lists for any other reasons, MU Health must obtain authorization from everyone on the list.
d. MU Health will not condition patient treatment or payment on whether the individual has opted out of receiving fundraising communications.
e. Each fundraising communication made to an individual must provide a clear and conspicuous opportunity to elect not to receive any further fundraising communications. The method for an individual to elect not to receive further fundraising communications may not cause the individual to incur an undue burden or more than a nominal cost. MU Health shall make reasonable efforts to ensure that individuals who have chosen to opt-out of receiving fundraising communications do not receive future fundraising communications (e.g., removal from mailing lists). Fundraising communications to an individual under who has elected not to receive such communications is prohibited.
f. MU Health may utilize a business associate (e.g., contractor, consultant, printer, and mailing services) to carry out fundraising activities on its behalf which involves the use of the PHI. A Business Associate Agreement (BAA) must be obtained prior to disclosing PHI to the business associate to carry out the Organization’s fundraising activities.
g. Charitable fund raising initiatives will be evaluated on the following:
   i. whether the initiative is an institutional priority;
   ii. if physical space is required; and
   iii. whether University financial resources are required, including one-time costs or ongoing support.
h. Suppliers and Vendors may be solicited for funds or gifts in kind only under the following conditions:
   i. The solicitation clearly does not imply there will be a link or relationship with or between the contribution from a supplier/vendor and the volume of business with a vendor; and
   ii. suppliers/vendors in active bid process shall not be solicited.
i. All data populating the Donorscape fundraising database will be accessed only by MU Health designated development staff and information technology support staff. Any data that is forwarded to the Advance fundraising system will contain only basic demographic information.
Title: Corporate Compliance - Fundraising and Gifts - Policy

IV. Attachments
   a. Not Applicable.

V. References, Regulatory References, Related Documents, or Links
   a. UM System CRR 30.040
   b. MU Health Policy “Conflict of Interest”
   c. MU Health Policy “Compensation and Business Courtesies”