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Owner Gregory Hoffman:
Providence Chief Financial Officer

Policy Area REHG-Resource, Engineering and Hospitality Group

Applicability Providence Systemwide + PGC

PSJH-REH-1009 Corporate Card, Travel, and Expense Policy - Physician Version

Executive Sponsor:	Greg Hoffman, Chief Financial Officer
Policy Owner:	Dave Walker, SVP Chief Resources Officer
Contact Person:	Pat Plaster, Senior Manager Travel Service Kevin Blair, Service Delivery Program Manager

Scope:

This policy applies to Physicians of the not-for-profit entities of Providence¹.

☒ Yes ☐ No Is this policy applicable to Providence Global Center (PGC) caregivers?

This is a management level policy reviewed and recommended by the Policy Advisory Committee (PAC) to consider for approval by senior leadership which includes vetting by Executive Council with final approval by the President, Chief Executive Officer or appropriate delegate.

Purpose:

This policy documents and describes the Providence policy and procedures related to the use of Corporate Cards, Travel, and Expense services for Providence Physicians. The intent of this policy is to provide relevant guidance to physicians across Providence.

Physicians are always encouraged to exercise their stewardship judgment in line with our Values and Mission.

Definitions:

- A. Physician: A Doctor of Medicine, osteopathy, dental surgery, dental medicine, podiatric medicine, optometry, or a chiropractor.
- B. Employed Physician: Physicians who are directly employed by Providence (i.e., physicians that receive W2 form from Providence).
- C. Executive Physician: An Employed Physician who dedicates a minimum of 0.5 full time equivalent (FTE) to Leadership/ Administrative duties(e.g., Chief Medical Officers, Vice Presidents, and Medical Directors)
- D. Non-Executive frequent traveler Physician: An Employed Physician who incurs business travel four times or more a year.
- E. Non-employed Physician: A Physician working through a third-party contractual agreement or affiliated through a Hospital Foundation (i.e., physicians that receive 1099 form from Providence).
- F. CME: Continuing Medical Education that is eligible for credits.
- G. REHG Program Administrator: The person in the Resource Engineering & Hospitality Group (REHG) that is assigned as the program administrator.
- H. Corporate Card: A credit card issued to be used for official business of Providence for small dollar purchase, travel, and entertainment.
- I. Out-of-Town Travel: Travel and required use of airfare or an overnight stay.
- J. International Travel: Travel outside of the United States.

Policy:

- Corporate card eligibility
 - Employed physicians are eligible to apply for Corporate Card with approval of corresponding Regional Chief Executive or Regional Chief Executive's designee.
 - Non-employed physicians are not eligible to apply for Corporate Card.
 - Executive physicians and non-executive frequent traveler Employed physicians are required to use Corporate Card for travel and business purchases. For this group, Corporate Cards must be used for all official Providence business related purchases, travel, and business.
 - Use of the corporate card for personal items is forbidden except in two cases: 1) where one charge includes partially personal item, and that personal item will not be submitted in the Electronic Expense Reporting Tool; or 2) in case of emergency.
- Travel
 - Employed physicians are eligible to use Providence contracted Travel Management Company (TMC) to book business travel.
 - Non-employed physicians are not eligible to use Providence contracted Travel

Management Company (TMC) to book business travel.

- Executive and frequent flyer Employed Physicians are required to utilize Providence contracted Travel Management Company (TMC) to book business travel.
- All travel reimbursement for out-of-town and local travel (including meals, hotel, car rental, etc.) will be reimbursed using the Electronic Expense Reporting Tool. The travel reimbursement request must be submitted, along with all itemized receipts, for processing in a timely manner to ensure accurate accounting. See FAQ for additional information.
- Where Employed physicians are unsure of any item(s) in this Policy, they are encouraged to seek clarification from phstravel@providence.org. Prior to all business travel, domestic or international: Consult the Providence travel site, [US State Department Travel Advisories](#) and [CDC](#) for guidance and safety assurance.

Section A: Corporate Card Requirements:

1. Executive and frequent flyer Employed Physicians required to apply for the Corporate Card with completion of the Corporate Card training (refer to reference section).
2. Late payment fees are the responsibility of the card holders if card holders don't submit expense report by the billing cycle timetable. Extenuating circumstances approved by direct supervisor and documented in Expense Reimbursement Tool will be considered for approval.
3. Corporate Card should be used to purchase items up to \$5,000 for a single use transaction. Higher limits may be requested to Procurement Team.
4. Employed Physicians are responsible for all the purchases on their card and for the security of their card. A lost or stolen Corporate Card must be reported to both the bank that issues Corporate Card and REHG Program Administrator immediately.
5. Using the Corporate Card. This program is not intended to avoid or bypass appropriate purchasing or payment procedures.
 - a. All transactions must comply with the [REHG Procurement Process – Procedure](#).
 - b. Purchases from vendors not accepting the corporate card is discouraged.
6. CME: Employed Physicians are not required to use corporate card for CME. However, they are encouraged to maximize their CME allowances by leveraging AMEX Travel Service.
7. Reconciliation of Charges
 - a. Card holders are required to:
 - i. Obtain itemized receipts for each transaction charged.
 - ii. Reconcile the Corporate Card statement matching the receipts in a timely manner and please refer to FAQ for details.
8. Unauthorized Use and Cancellation of Cards
 - a. Any Employed Physicians that suspect an individual may be abusing this policy in the use of a Corporate Card must notify the REHG Program Administrator (i.e., Card Program Administrator (ProcurementCardAdmin@providence.org)) and/or the [Integrity Hotline](#).

- b. Corporate cards may be cancelled due to termination of employment at Providence, extended leave without pay, violation of Providence policies, non-timely reconciliation, or improper use.

Section B: Travel Requirements:

1. **Providence Business Travel:** Providence Employed Physicians required to travel for business will submit for ordinary and necessary expenses incurred through Electronic Expense Reporting Tool and those expenses will be paid by Providence. Travel requiring airline, rental car, and hotel booking will be arranged through Providence contracted TMC. ***The traveler could forfeit any and all reimbursement for air, car, and hotel reservations if they were not booked through the Providence contracted TMC.*** Exceptions to this policy are for large meetings or conventions that require or offer to facilitate the hotel reservations through the meeting or convention's designated booking process or agent.
2. **All travel arrangements:** (including air, car, hotel, and meals) should be conducted with stewardship as a priority.
3. **CME:** When booking travel as part of CME, all Employed Physicians are required to upload their travel itineraries to the Expense Reimbursement Tool.
4. **Spouse or Companion Travel:** Travel expenses incurred by an Employed Physician's spouse or companion will not be covered by Providence unless the spouse or companion is required, or officially invited, to attend a Providence sponsored meeting.
5. **Air Travel:** Air travel must be arranged through Providence-contracted TMC and consideration shall be given first to Providence preferred airlines. Employed Physicians are encouraged to book economy class flight ticket for all travel under four hours. Air travel should always be at the lowest fare, and most flights should be tourist, coach, or economy class. However, when a domestic flight is over four hours, upgraded class flights may be booked if the Employed Physician obtains approval from direct supervisor.
6. **Cancellations:** Cancellations to air travel can be made by accessing the trip in the online booking portal or by directly contacting the Providence contracted TMC. All airline tickets are the property of Providence.
7. **Rental Vehicles:**
 - a. Employed Physicians are encouraged to select the most cost-effective option between ride-share vehicle and rental car.
 - b. All rental vehicle reservations will be arranged through Providence contracted TMC using Providence contracted rental vehicle companies. See the Providence auto insurance site.
 - c. All Employed Physicians should carry a current rental vehicle insurance wallet card, which may be found on the Providence Travel site.
 - d. All car rental invoices should be paid by the Employed Physicians at time of rental car return using their Corporate Card.
8. **Hotel Accommodations:**
 - a. Hotel reservations must be arranged through Providence contracted TMC unless related to a convention, conference, or training where a lower group rate has been

- arranged through the hotel.
- b. Employed Physicians should utilize Providence contracted and preferred hotels whenever possible while traveling on Providence business, booking standard room type, with minimal exceptions (See Section 1 Business Travel).
 - c. Accommodations should be standard rooms, reasonably close and convenient to the educational/business event location in lodgings corresponding with the purpose of travel. Accommodations will be reimbursed at one person per hotel room rate.
9. **Other Travel Expenses:** Only certain business-related costs incurred during travel are reimbursable. Some examples of other allowable travel expenses included, but are not limited to (refer to FAQ for detail examples):
- a. Laundry and Dry Cleaning
 - b. Gratuities and Tips
 - c. Taxi/Car services
 - d. Passport and Visa fees when required for Providence travel
10. **Unallowable travel expenses:** Unallowable travel expenses are typically not covered by Providence. Unallowable expenses include but are not limited to the following (refer to FAQ for detail examples):
- a. Traffic and Parking Citations and Fines
 - b. In-room movies
 - c. Gift shop charges
 - d. Magazines, books, and daily newspapers
 - e. Childcare expenses
11. **Daily Food Allowance:** Providence will reimburse Employed Physicians for meals that are actually incurred and are supported by itemized receipts. For Business Meals, Employed Physicians must submit the restaurant bill itemized receipt with a breakdown of items purchased and the names of the individuals whose meals are being reimbursed.
12. **Alcoholic Beverages:** Reasonable alcohol purchased with meals and/or for business purposes are allowed.
13. **Entertainment:** Entertainment expenses are authorized only when incurred for the specific benefit of Providence. Reimbursement documentation should identify individuals or group in attendance, however if individuals from other organizations are entertained, the IRS regulations require the following:
- Name(s) of individual(s) entertained
 - Name of the individual(s) firm
 - The place of entertainment
 - What was discussed/ the purpose of the entertainment
14. **Mileage Reimbursement:** Providence will reimburse Employed Physicians who use their personal automobiles for Providence business or educational purposes. Personal or indirect

miles will not be reimbursed. If an Employed Physician is involved in an automobile accident in their personal vehicle while on Providence business, they will not be reimbursed for the cost of any personal insurance deductible.

- a. Reimbursement will be at the standard IRS mileage reimbursement rates in effect at the time of travel multiplied by the trip miles ([IRS Standard Mileage Rates](#)). The trip miles will be based on the most direct route between locations per the expense tool calculator, GPS or MapQuest or similar mapping website.

15. **Same Day/Local Travel:** Employed Physicians must track the date of travel, the to-and-from locations, the mileage between locations, and the business purpose of the trip on the travel expense form. Same Day/ Local Travel is defined as no overnight stay required. For Providence business out of or within the Employed Physician's home service area where mileage would be reimbursed for use of own automobile, the employed Physician should perform a mileage reimbursement calculation versus local rental car cost. The lower cost option should be utilized.

- a. Employed Physicians using their automobiles to travel to a temporary or alternate work location for official Providence business will be reimbursed by Providence for the traveled miles in excess of the employed Physician's normal commuting miles. See the FAQs for further clarification.
- b. Travel from home to the Employed Physician's normal work location and back home are personal commuting miles and are not reimbursable. Travel from home to either the airport or directly to an out-of-town location are reimbursable within previously stated guidelines.

16. **Violation of Policy:** Intentional misuse of travel as described in this policy will be considered a violation of Providence Code of Conduct Policy and may result in disciplinary action up to and including termination of employment.

17. **Exceptions to Policy.** Not every circumstance can be covered by policy. A reason for the exception should be noted in the comments of the expense report. A contractual agreement between Executives and Providence may impact this policy. See the FAQs for further clarification.

18. **International Travel:**

- a. **Business Class Airline Travel:** When international travel over seven hours is required, business class airline tickets are allowed. The flight should be the lowest cost fare available for this class of travel. The Employed Physician should consider available budget, type of work to be performed, and trip duration when using this exception. If there is a business reason for an exception to this policy, the Employed Physician should practice discretion.
- b. **Hotel Accommodations:** In international locations where negotiated hotel rates are not available, the Employed Physician may request the use of preferred negotiated rates of the host supplier or inviting organization.
- c. **Airport transfers:** Transfers should be made via the hotel at destination or a Providence contracted TMC to insure reliability and safety.
- d. **Meals:** For international travel, Employed Physician should follow U.S. State Department limits, with few exceptions. <https://aoprals.state.gov/web920/>

[per_diem.asp](#)

- e. **Visa Requirements:** It is the responsibility of the Employed Physician to secure passports and visas where required. For further information refer to: <https://travel.state.gov/content/travel/en/international-travel.html>
- f. **Inoculation and immunization requirements:** If an inoculation or immunization is required for travel, Providence will reimburse the Employed Physician for any amount not paid for by the Employed Physician's insurance. See the FAQ for additional information.
- g. **Communication** While traveling internationally, there are a few options available for business-related audio, video, or text communication locally and back to the US. Wickr.com and WhatsApp are the preferred, secure Apps for business communication. Any international service will be reimbursable within reason. Confirm with your communications provider that international roaming and/or ISD calling is enabled on your phone with the goal of selecting the most cost-effective option.
- h. **Travel Assistance Program** All Employed Physicians should check the Providence travel insurance policy coverage document to confirm the coverage and type of travel assistance services available to them. Please carry a copy of your [travel assist ID card](#) with you at all times.

19. **Any exception to the above should be considered in light of our Values.**

Section C: Non-employed physician

This section has been established to comply with all state and federal regulations, including without limitation Federal Self-Referral Law (i.e., the Stark Law) and the Federal Anti-Kickback Statute and provide guidance in those instances in which Providence requests that a physician attend a meeting or conference outside of said physician's normal medical staff or contractual duties to better enable the physician to perform his/her medical staff committee or leadership role (as applicable), or contractual responsibilities under a written agreement with Providence (e.g., medical director duties).

- 1. Reimbursement eligibility:
 - a. The physician must have been requested to attend the meeting/conference by an administrative representative from one of the Providence's Ministries.
 - b. The content of the conference/meeting must relate to the physician's medical staff or medical director's responsibilities on behalf of Providence, and better enable the physician to carry out those responsibilities.
 - c. The Department of Legal Affairs ("DLA") approved Medical Director Agreement contains language to allow for reimbursement for attending meetings/conferences. Use the DLA approved Letter of Agreement (LOA) if the physician is not a Medical Director. The LOA should detail why the physician's participation in said meeting/conference is relevant to the physician's administrative or medical staff role with Providence. The LOA should be approved by DLA prior to travel by the Non-employed Physician.

- d. All expenses and associated receipts (travel and reasonable out-of-pocket expense) will be turned into the designated travel coordinator for compilation and submission to the Providence Finance department for payment.
2. Reimbursement requirement:
 - a. Reasonable expenses will be reimbursed for costs incurred. Expenses incurred by spouses/partners/guests will not be reimbursed unless an exception has been approved by Providence Leadership and an associated agreement is in place.
 - b. Unless otherwise agreed to in writing prior to the meeting/conference, as a general rule, Providence does not reimburse and/or compensate for any time spent commuting – including but not limited to automobile, train, and/or air travel.
3. Providence and Physician will keep a log of Compensation to Physicians for Meetings, Services, and Activities for purposes of external review and Providence's internal accounting. An IRS form W-9 completed by the physician, must be included with the Providence expense reporting form that is forwarded to accounts payable in order for payment to be made to the physician.
4. Both the compensation and expense reimbursement components of the payment to the physician must be reported on a Form 1099 issued to the physician, provided the payments exceed \$600 for each tax-reporting year. However, if the physician accounts to Providence as the payer by using the Providence Expense Reporting Form, the travel reimbursement payments would not need to be reported on the Form 1099.

References:

[Travel and Expense Profile Set up tutorial](#)

[Corporate Card Tutorial](#)

[REHG Procurement Process – Procedure](#)

Applicability:

[1] For purposes of this policy, “Affiliates” is defined as any not-for-profit or non-profit entity that is wholly owned or controlled by Providence St. Joseph Health (PSJH), Providence Health & Services, St. Joseph Health System, Western HealthConnect, Kadlec, Covenant Health Network, Grace Health System, Providence Global Center*, NorCal HealthConnect, or is a not-for-profit or non-profit entity majority owned or controlled by PSJH or its Affiliates and bears the Providence, Swedish Health Services, St. Joseph Health, Covenant Health, Grace Health System, Kadlec, or Pacific Medical Centers names (includes Medical Groups, Home and Community Care, etc.). *Policies and/or procedures may vary for our international affiliates due to regulatory differences.

Approval Signatures

Step Description	Approver	Date
PSJH President/CEO	Cynthia Johnston: Sr Compliance Spec PSJH	10/2021
PSJH Executive Council	Cynthia Johnston: Sr Compliance Spec PSJH	10/2021
PSJH Policy Advisory Committee	Cynthia Johnston: Sr Compliance Spec PSJH	10/2021

Standards

No standards are associated with this document

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