

PPE Plan Guide

Everything about the Plan, Claims Eligibility, and Documentation Requirements

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Physician Professional Expense (PPE) Program

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Plan Overview

Key Features

The Physician Professional Expense (PPE) Program is an exclusive benefit offered by Radiology Partners to its valued physician and physician extender teammates. The program allows eligible participants to receive tax-free reimbursement by their practice for certain expenses. Qualified expenses include business expenses and expenses for continuing medical education.

Effective Date

The provisions of the PPE plan went into effect July 1, 2022.

Practices Determine Participation

Each practice determines whether their practice will participate in the PPE plan and the allocation levels for each Tier, in accordance with internally established guidelines.

Tiers of Participation

There will be five physician “Tiers” of potential allocations in the program:

- Tier 1: Partners
- Tier 2: Partnership Track Associates
- Tier 3: Non-Partnership Associates
- Tier 4: Mid-Level Teammates (if applicable)
- Tier 5: All Part-Time Teammates (if applicable)

Allocations Set Annually

New allocation levels are set by each practice for each calendar year in accordance with internally established guidelines. Radiologists are placed in a specific Tier for the calendar year, based on their employment status on January 1st each year. Through December 31st, 2025, there are no mid-year tier changes.

New for 2026 - Mid-Year Tier Changes

Employees are placed in a tier based on their employment status on January 1. Should an employee experience a change in employee status mid-year, your tier will be updated accordingly. If the change in tier results in a change to your plan allocation, it will be prorated based on the number of months left in the year, including the month the change became effective. For example, an employee with an employee status change effective October 20 would receive 3/12ths of the annualized allocation for their new tier.

New Hires and Transfers

Mid-year new hires will receive a pro-rated PPE allocation. Proration is calculated based on the months remaining after the date of hire (including the month of hire). For example, a new employee with a hire date of June 15th would receive 7/12ths of the annualized allocation.

In the case of a transfer from one practice to another (within the Radiology Partners organization), you will be treated as a new hire with the receiving practice. No accommodation will be made between practices or allocations. The allocation will be applied as if the transferring radiologist is a completely new partner/associate with the new practice.

Reimbursements Made via Direct Deposit

Reimbursements are processed via direct deposit to your personal bank account. Please make sure you have added your personal bank account information to your account via the Vita Flex portal. If you already have your bank account information entered for another Vita Flex pre-tax account, there is no further action necessary.

Upon Termination

Upon termination of employment, unused PPE allocations are forfeited. Claims incurred prior to your employment termination must be submitted within 30 days of your employment termination date.

Plan Eligibility Requirements

Physicians and physician extenders working full-time or part-time for a Radiology Partners affiliated practice are eligible. Physicians who are independent contractors of a Radiology Partners affiliated practice are not eligible.

Internet/Cell Phone Stipend

Practices have the ability to set an internet/cell phone stipend that is separate from the PPE plan. Each practice makes an annual determination of a monthly stipend level, between \$0 to \$200. If a practice elects to allocate monies for an internet/cell phone stipend, a flat amount will be reimbursed monthly on a tax-free basis. No receipts or documentation need to be submitted for these expenses.

Regular monthly internet and cell phone expenses are not eligible under the PPE plan. The internet/cell phone stipend is not part of the PPE plan; thus, stipend amounts are not included in the PPE plan allocation. Rather, any stipend would be in addition to the PPE plan allocation.

Program Administration

The PPE program is administered by Vita Administration Company. Vita also administers the other Radiology Partners pre-tax plans including the health FSA, dependent care FSA, HSA, HRA and commute plans. PPE accounts are accessed on the same platform as all other pre-tax plans in which you are currently participating.

Questions and Help

The Vita Concierge Team is available if you need assistance or have questions.

Website:	rpbenefits.com / www.vitaflex.net
Phone Number:	650-966-1492
E-mail for questions:	help@vitamail.com
E-mail to submit claims:	PPE@vitamail.com

Claims Overview

Introduction

Professional expenses that would otherwise be considered tax deductible business expenses are eligible for reimbursement. The plan generally follows eligibility and documentation guidelines that are accepted by the IRS.

The following pages are dedicated to outlining claims eligibility issues and documentation requirements. The general categories of eligible claims are outlined, and details are provided on specific restrictions, documentation requirements, claim processing assumptions, and tricky issues that are sometimes faced. A description of the reasons for the restrictions and for unique requirements is provided for context whenever possible.

The following are the general categories of eligible claims. Details and documentation required for each category are described under Eligible Expenses below.

Overview of Eligible Expenses

- Cell phone purchase
- CME registration fees
- CME travel expenses
- Legal fees (practice negotiation)
- Licensing and credentialing fees
- Office furnishings and supplies
- Professional licenses
- Professional association membership fees
- Professional journal subscriptions
- Textbooks and study materials

Expenses are not eligible if they are otherwise reimbursed by the practice.

Plan Funding:

The PPE Plan operates on a “pay as you go” basis. Your PPE account is funded after Radiology Partners confirms that contributions have been processed. Once Vita Flex receives this confirmation, the funds will become available in your PPE account for claim reimbursements.

If you notice a negative balance in your PPE account, it likely means you submitted a claim exceeding your available funds. If the claim is approved, reimbursements will continue as additional PPE funds are deposited into your account. Typically, this occurs after your next payroll deduction is processed.

How to Submit Claims

Step-by-step instructions on how to submit claims may be found in the How to Submit Claims document. Following is a short overview.

Online Submission: To obtain reimbursement for your eligible PPE expenses, you must complete an online claim form and submit documentation of the qualifying expense.

Mobile App Submission: You may also submit your claim request and documentation via the Vita Flex online mobile app. Download the app at the Apple Store or Google Store. Search for Vita Flex to download.

Email Submission: Email claims to PPE@vitamail.com. Name, last four digits of SSN, vendor name, and requested reimbursement amount must be included in the email. Documentation must also be attached to the email.

Claims Adjudication: Vita will review expenses, confirm documentation, and determine whether it is eligible for reimbursement. Upon completion, you will receive an "Advice of Deposit" confirming when the reimbursement will be issued to you. If the expense is ineligible or there is missing documentation, you will receive a claim denial notification or a request for additional documentation via email.

Reimbursement Timing

Submit by Tuesday: If your claim is approved by Tuesday of a given week, your reimbursement will be processed by Thursday.

Direct Deposit on Friday: Your reimbursement will then be deposited into your personal bank account on Friday of that week.

Reimbursements Every Friday: If you miss the Tuesday cutoff, your reimbursement will be deposited into your bank account on Friday of the following week.

No Direct Deposit Information: If direct deposit information has not been entered into the VitaFlex system, your reimbursement will be issued via a check mailed to the address Vita has on file.



Timing for Incurring Eligible Expenses

General Rule: For expenses to be eligible, you must pay for the expense within the calendar year in which you are requesting reimbursement.

Cash Basis Accounting: The IRS considers all individual taxpayers to be cash basis taxpayers. Under the cash basis accounting method, business expenses can generally be deducted in the year in which you pay for them. Conversely, business expenses cannot be deducted in a year other than the year in which payment was made.

Same Tax Principle: This is the same principle as applies to deduction of other expenses on your tax return. For example, if you pay for property taxes in 2022, the full payment amount is deductible in 2022, regardless of the fact that a portion of the taxes may be for a period that rolls into 2023.

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Conversely, property tax payments made in 2021 are not a deductible expense for the 2022 tax year.

Example: This means that if you pay for a CME expense in 2022, it will be eligible for reimbursement in 2022, regardless of whether the actual CME event occurs in 2023.

Business Only Expenses

General Rule: All expenses must be used only for business or professional related purposes.

Shared Personal/Business Use Items: If expenses are for items that are used for a combination of business and personal use, you must estimate the percentage used for business purposes and *claim only that portion* of the total expense.

No Personal Use: The IRS requires no material personal use to have an expense qualify as 100% business expense.

Example: If you purchase a cell phone which is used for both business and personal purposes, you must estimate the share of use for business vs. personal purposes. If the cell phone costs \$700 and you estimate the share of use at 50% business/50% personal, only \$350 of the purchase price of the phone is eligible. You must affirmatively claim only the portion of the expense that corresponds to the business allocation you have determined.

General Documentation Requirements

General Requirements: Documentation *must* accompany all claims and must satisfy the IRS requirements for business expense documentation. This typically means the following elements must be included: your name (RP physician), service or product provider, description of product or service paid for, date the product or service was rendered (CME course date, membership dates, etc.), and the date paid.

Itemized Receipts: Actual receipts with expense descriptions are required. A credit card receipt alone will not satisfy IRS guidelines. If the documentation includes expenses that are not eligible (for example family member expenses), you must itemize the elements of the expense that is attributed to you as the physician.

IRS Audit-Proof: What if the documentation I was provided does not include all of the required elements? This is a difficult situation because claims with insufficient documentation cannot be reimbursed under the plan. Just as if you were the sole proprietor taking a business deduction, Radiology Partners must retain documentation to substantiate the business nature of the expense that is reimbursed. Thus, if all required elements of the documentation to substantiate the claim are not present, the item is not eligible for reimbursement. All documentation for all claims must be sufficient to withstand an IRS audit. Thus, any claim with inadequate documentation is not eligible, regardless of whether the claim would otherwise be an eligible expense.

Eligible Expenses

Cell Phone Purchase

<p>General Guidelines</p>	<p><u>Phone.</u> The portion of the cost for purchasing a cell phone attributed to business use is deductible and thus eligible under the PPE plan.</p> <p><u>Phone Peripherals.</u> The portion of cost of peripheral equipment for phone use (such as chargers and safety cases) that is attributed to business use is an eligible expense.</p>
<p>Restrictions</p>	<p><u>Personal vs. Business Use Allocation.</u> The IRS requires an allocation be made as to the business vs. personal use of a cell phone (or other phone peripheral equipment). Only the portion of a cell phone purchase that is directly attributed to business use is deductible. We recognize that this determination may be slightly different for each physician, however, for PPE claim adjudication purposes, a single standard assumption is applied for all physicians. Because of the nature of the PPE being an employer sponsored plan, this assumption must be conservative enough to accommodate all participating physicians.</p> <p><u>Other Family Members.</u> No portion of costs for purchasing a cell phone for other family members is eligible under the plan.</p> <p><u>Frequency of Purchase.</u> There are no specific IRS restrictions on the frequency of business cell phone purchases. However, too frequent purchases are a red flag for the IRS that phones may have been purchased for someone other than the claimed recipient. For this reason, cell phone purchases are restricted to one per year unless documentation can be provided that the original phone was lost or destroyed. In these cases, a personal attestation with a detailed explanation may be considered. This restriction applies to cell phone peripheral equipment, as well.</p> <p><u>Assumed Claim Amount.</u> Claims will be processed assuming the default allocation is the requested reimbursement amount. This means that the claim amount entered will equal the default allocation amount regardless of what is put on the claim form or reflected on the bill. Amounts over the default amount will not be reimbursed but will also not show as denied expenses.</p> <p><u>Financing of Phone Purchase.</u> If the purchase of a cell phone is made on a financed basis, reimbursements can only be made after actual payments have been made. Such expenses may be submitted monthly or for multiple months payments.</p>

<p>Documentation</p>	<p><u>Copy of Purchase Receipt.</u> A copy of the complete phone purchase receipt is required. The receipt must identify the name of the physician submitting the charges. Note: for accessories such as cell phone cases and chargers, the receipt does not need to include the name of the physician.</p> <p><u>Insufficient Documentation.</u> A purchase statement that does not identify the name of the physician is not adequate documentation. Partial billing statements (such as the front, summary page only) are not sufficient. The full itemized receipt is required to confirm that no other ineligible expenses are included in the purchase.</p>
<p>Claim Processing Assumptions</p>	<p><u>50%-50% Business-Personal Use Assumed.</u> It will be assumed that cell phones submitted for reimbursement will be used for 50% business purposes and 50% for personal purposes.</p> <p><u>Alternate Business-Personal Use Percentage.</u> If the cell phone will be used a level that deviates from the default 50%-50% business-personal use ratio, a Statement of Use declaration may be submitted. The Statement of Use must be received at the same time the claim is submitted.</p> <p><u>Requirements for Statement of Use.</u> The Statement of Use declaration must include the following elements:</p> <ul style="list-style-type: none"> • Name of the participant • Details of the cell phone purchased • Date of purchase • Specific business-personal use split • Documentation of alternate cell phone (if claiming 100% business use). A copy of alternate cell phone billing statement in the name of the participant is typically the easiest way to document this. <p><u>How to Submit a Statement of Use.</u> An email, typed note, or handwritten note with the required information is sufficient. The Statement of Use should be included an emailed claim to PPE@vitamail.com or submitted along with the initial claim if submitted online.</p> <p><u>Requirements for 100% Business Use.</u> In order to claim 100% business use for a cell phone, participants must maintain another cell phone to be used for all personal matters.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of a cell phone that is otherwise used for 100% business purposes is considered to be no more than a few times per month.</p> <p><u>Assumed Claim Amount.</u> Claims will be processed assuming the default allocation is the requested reimbursement amount. This means that the claim amount entered will equal the default allocation amount regardless of what is put on the claim form or reflected on the bill. Amounts over the default amount will not be reimbursed but will also not show as denied expenses.</p>

Eligible Examples	<ul style="list-style-type: none"> • Cell phone • Cell phone charger • Cell phone accessories/protective case • Cell phone financing plan payments • AppleCare for iPhone <p><i>(All eligible expenses are subject to the business/personal use allocation)</i></p>
Ineligible Examples	<ul style="list-style-type: none"> • Multiple phone purchases • Phone purchases for family members • Portion of phone purchases allocated for personal use

CME - Course Registration

General Guidelines	<p>Registration fees for medical related CME courses are eligible.</p>
Restrictions	<p><u>All-Inclusive.</u> If CME courses are billed on an “all-inclusive” basis (where food and lodging are included), fees for the CME course itself must be separated in order to be eligible.</p> <p><u>Medical CME Only.</u> CME for subject matter that is not directly related to radiology, or the practice of medicine is not eligible.</p> <p><u>Restrictions for Travel Outside of US.</u> CME events and travel outside of the United States are restricted and may be ineligible if special criteria are not met (see details below).</p> <p><u>Reimbursement Timing.</u> CME course registration fees are eligible for reimbursement in the calendar year in which payment is made for the CME course, regardless of when the course actually was held.</p> <p><u>Co-Submission with Travel Expenses.</u> CME-related travel and hotel expenses must be submitted for reimbursement along with a copy of your CME course registration.</p>
Documentation	<p><u>Itemized Receipt or Invoice.</u> A detailed registration receipt or invoice is required for documentation. The receipt must outline the following items:</p> <ul style="list-style-type: none"> • CME course description • Fees for the course • Dates of the event or conference • Location/city where the CME will be held (or note of virtual) <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts do not generally include all of the required elements. In most circumstances, a credit card receipt alone is not sufficient documentation.</p>

Claim Processing Assumptions	No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.
Eligible Examples	<ul style="list-style-type: none"> • Professional association sponsored CME • University sponsored CME • Society meeting based CME • Educational symposium CME • Conference based CME
Ineligible Examples	<ul style="list-style-type: none"> • Business or practice management CME • CME conferences that occur on cruise ships (except as specifically outlined below)

CME - Hotel Expenses

General Guidelines	Lodging expenses directly related to CME courses are eligible expenses. Broadly, this includes hotel or other hosted housing (such as Airbnb, etc.) at conference destination.
Restrictions	<p><u>Maximum Allowed Nights.</u> Actual hotel expenses (so long as they are reasonable) for the duration of the conference plus one night before and one night after are eligible. (CME Dates + 1 Night Before + 1 Night After).</p> <p><u>Excess Days.</u> Hotel nights in excess of the allocation are generally not eligible. If unique circumstances warrant, an additional one-day hotel stay can be authorized. Generally, this would be approved if it is not feasible to travel home on the day the conference ends. A description of the timing that creates unreasonable travel requirements is required.</p> <p><u>Maximum Per Night.</u> Lodging expenses (hotel or Airbnb) have a maximum of \$833 per night. This limit is necessary to comply with the IRS restrictions prohibiting lavish or extraordinary expenses. If actual expenses exceed this limit, the amount up to the threshold will be processed as eligible and the remainder will be considered not eligible for reimbursement.</p> <p><u>CME Registration Documentation.</u> CME registration documentation must be submitted and referenced such that hotel expenses can be matched with the CME event. Hotel timing must match CME event timing.</p> <p><u>Frequent Flyer Mile Travel.</u> If frequent hotel club points are used to book travel, no "cost equivalent" can be reimbursed, even if "cost equivalent" documentation is provided.</p>

	<p><u>Additional Guest Charges.</u> Direct additional charges incurred for a guest or family members to accompany the participant are not eligible. For hotels, if a two-room suite is selected because family members are accompanying the physician, only the equivalent cost of a regular hotel room would be considered a business expense. If there is no additional cost for a guest sharing a room, the entire cost of the room is considered a business expense (because the same cost would have been incurred had a guest not been present.)</p> <p><u>More than One-Room Accommodations.</u> When accommodations are arranged for business travel that are more than a one room arrangement, there are two potential ways to calculate what portion is a business expense:</p> <ul style="list-style-type: none"> • <u>Ratio of Rooms.</u> The default method is to take a simple ratio of the number of rooms and apply that to the nightly cost. For example, the business expense for a two-bedroom suite would be half the nightly cost. The business expense for a three-bedroom house would be 1/3 of the nightly cost. The remainder would be considered a personal expense and not reimbursable. The one-room equivalent cost is still capped at the plan nightly maximum. • <u>Alternate, Less Expensive Lodging.</u> In some cases, renting a two-bedroom house may be less expensive than renting a single hotel room (at the conference hotel or equivalent). In this case, the entire cost of the two-bedroom house (or other lodging) will be considered an eligible business expense. For this Alternate, Less Expensive Lodging option to be considered, the participant must provide documentation of the single hotel room cost (at the conference hotel or equivalent) and submit the documentation at the time the lodging expense is submitted. A screenshot of the single hotel room cost with the same dates is sufficient for this documentation.
<p>Documentation</p>	<p><u>Hotel Receipt.</u> A detailed receipt or invoice is required for documentation. The receipt must outline the following items:</p> <ul style="list-style-type: none"> • Participant name • Location/city where the CME will be held • Dates for the hotel • Total charges <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts do not provide all of the required elements and thus are not sufficient documentation.</p> <p><u>Alternate, Less Expensive Accommodations.</u> When this option is elected, documentation showing that the cost of a single hotel room (at the conference hotel or equivalent) is greater than the cost of the selected lodging option is required. A screenshot showing the cost for a single hotel room with the same dates is sufficient for this documentation.</p>

<p>Claim Processing Assumptions</p>	<p><u>Allowed Nights.</u> Actual hotel charges for CME Dates + 1 Day Before and 1 Day After.</p> <p><u>Exception Request.</u> A request for additional travel days to be considered for reimbursement must be submitted with the initial claim submission. Extensions are approved only when CME Dates + 1 Day creates an unreasonable travel scenario.</p> <p><u>Virtual Conferences - Generally Excluded.</u> In general, lodging expenses for virtual conferences are not an eligible expense. This is the rule since it is generally assumed that a virtual conference could be attended either in a home office setting or work office setting.</p> <p><u>Virtual Conferences - Special Circumstances.</u> It is recognized that in certain circumstances, a home or office environment may not be conducive to participation in a virtual conference. Therefore, when extenuating circumstances warrant, lodging expenses may be considered eligible for a virtual CME course. Following are the requirements for when travel expenses may be covered for a virtual conference:</p> <ul style="list-style-type: none"> • A special request (via email or submitted along with the claim) stating the special circumstances and why travel is required (not preferred) for a virtual conference is necessary. • Documentation will be reviewed and approved if it is deemed defensible under IRS business necessity guidelines. • Location must be more than 100 miles from home or office location • No air travel • Ground travel only
<p>Eligible Examples</p>	<ul style="list-style-type: none"> • Hotel charges • Alternate lodging expenses (Airbnb, etc.) • Taxes and fees
<p>Ineligible Examples</p>	<ul style="list-style-type: none"> • Hotel days beyond CME + 1 Day (unless a special circumstance is documented and approved) • Extra hotel/lodging expenses required for multiple people • Lodging expenses for virtual conferences (unless specific statement of business necessity is approved) • Cost equivalent reimbursement when booked with hotel or credit card "points" program • Expenses when CME event documentation is not provided along with the hotel reimbursement request. • Hotel equivalent charges for staying with family or friends (when no actual costs are incurred)

	<ul style="list-style-type: none"> • Hotel for travel for virtual conferences (unless within 100 miles of home) • Hotel expenses for certain CME vendors that offer virtual conferences with the option to identify a chosen “location” for the event on the receipt documentation • Cruise ship-based lodging expenses are restricted (see below)
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CME - Transportation Expenses

General Guidelines	<p>Transportation expenses directly related to CME courses are eligible expenses. Broadly, this includes airfare, car rental/car service fees (Uber/Lyft), mileage cost (when driving), and parking fees at the conference destination.</p>
Restrictions	<p><u>Airfare.</u> Airfare expense for yourself (only) to and from the location where the CME is held. Dates of air travel do not need to be directly adjacent to the CME dates. Location of air travel must be to the destination city. Upgrade charges for up to business class travel are eligible.</p> <p><u>Car Service.</u> Actual expenses for transportation services (to and from airport, to and from hotel, etc.). This includes cab services or car services such as Uber or Lyft.</p> <p><u>Car Rental.</u> Actual expenses for car rental during the dates of a CME event. In addition, expenses for shoulder days (one day before plus one day after the CME event) are also eligible. Additional days are not eligible. Gas purchased for a rental car is eligible.</p> <p><u>Mileage Cost.</u> The standard mileage rate is reimbursable when driving to a CME event. No gas or other car expenses are eligible as they are subsumed in the IRS mileage reimbursement rate.</p> <p><u>Parking.</u> Actual expenses incurred for parking your car or a rental car while at the CME event.</p> <p><u>Frequent Flyer Mile Travel.</u> If frequent flyer miles or credit card points programs are used to book travel, no “cost equivalent” can be reimbursed, even if “cost equivalent” documentation is provided.</p> <p><u>CME Registration Documentation.</u> CME registration documentation must be submitted and referenced such that transportation expenses can be matched with the CME event. Transportation timing must match CME event timing.</p> <p><u>Virtual CME Conferences.</u> Transportation expenses for virtual CME conferences follow the same standards as outlined under hotel expenses.</p>

	<p><u>Additional Guest Charges.</u> Direct additional charges incurred for a guest or family members to accompany the participant are not eligible. For example, only airfare for the physician is eligible, not additional family members or guests.</p>
Documentation	<p><u>Airfare.</u> A standard airline reservation confirming showing the destination and charges for the flight provides sufficient documentation.</p> <p><u>Car Rental.</u> A detailed receipt or invoice is required for documentation. The receipt must outline the following items:</p> <ul style="list-style-type: none"> • Participant name • Location/city where the CME will be held • Dates for the hotel or car rental • Total charges <p><u>Gas for Car Rental.</u> A gas pump receipt with dates aligning with the rental care dates.</p> <p><u>Mileage.</u> Documentation as outlined under Non-Commute Mileage Expenses. Generally, a copy of a Google Maps showing the mileage from the home destination to the CME Event is sufficient. Mileage reimbursement will be doubled for the drive to and from the event.</p> <p><u>Parking.</u> A parking receipt showing the charge and the date within the CME period is required. Alternatively, if parking is included in the hotel bill, this is acceptable. Detailed receipt or invoice is required for documentation.</p> <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts do not provide all of the required elements and thus are not sufficient documentation.</p>
Claim Processing Assumptions	<p><u>Airfare.</u> Actual airfare. Actual upgrade charges up to business class travel.</p> <p><u>Car Rental.</u> Actual rental charges for CME Dates + 1 Day before and 1 Day after.</p> <p><u>Car Service.</u> Actual charges in destination city.</p> <p><u>Exception Request.</u> A request for additional travel days to be considered eligible must be submitted with the initial claim submission. Extensions are approved when CME Dates + 1 Day creates an unreasonable travel scenario.</p>
Eligible Examples	<ul style="list-style-type: none"> • Airline ticket • Car rental fees • Car service (Uber/Lyft) fees • Taxes and fees charged for any transportation expenses
Ineligible Examples	<ul style="list-style-type: none"> • Car rental days beyond CME +1 Day • Commute travel expenses

	<ul style="list-style-type: none"> • Expenses when CME event documentation is not provided • Transportation expenses for virtual conferences • Transportation expenses for certain CME vendors that offer virtual conferences with the option to identify a chosen “location” for the event on the receipt documentation
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CME - Meal Expenses

General Guidelines	Meal expenses directly related to CME courses are eligible expenses.
Restrictions	<p><u>Meals During Conference.</u> Reasonable meal expenses for the duration of the conference plus the night prior to the conference are eligible.</p> <p><u>Travel Days.</u> Meal expenses on travel days to and from CME event are eligible.</p> <p><u>Maximum Per Day.</u> Meal expenses up to a maximum of \$198 per day. This limit is necessary to comply with the IRS restrictions prohibiting lavish or extraordinary expenses. If actual expenses exceed this limit, the amount up to the threshold will be processed as eligible and the remainder will be considered not eligible for reimbursement.</p>
Documentation	<p>Receipts are required for all meal expenses.</p> <p><u>Itemized Receipt.</u> A detailed purchase receipt from the restaurant or store is required for documentation. The receipt must outline the following items:</p> <ul style="list-style-type: none"> • Date • Specific food and beverage items <p><u>More Than One Person:</u> If food expenses for more than one person are included on the receipt, the specific food items for the physician must be noted on the receipt. (Handwritten notes are fine.)</p> <p><u>Cost Ceiling.</u> Meal expenses in excess of \$198 per day are not eligible.</p> <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts that show the total only and do not provide specific purchase items are not sufficient.</p> <p><u>CME Registration Documentation.</u> CME registration documentation must be submitted and referenced such that meal expenses can be matched with the CME event. Meal expense timing must match CME event timing.</p> <p><u>Food/Meals for Meetings.</u> Food purchased for multiple people for a meeting is not eligible under the PPE plan. This includes expenses for items such as breakfast food for an early morning meeting or lunch for a business meeting.</p>

Claim Processing Assumptions	No specific assumptions made. Expenses are reimbursed based on the specific claims submitted.
Eligible Examples	<ul style="list-style-type: none"> All regular meals (breakfast, lunch, and dinner) and beverages to accompany those meals.
Ineligible Examples	<ul style="list-style-type: none"> Lavish meals or any expenses above \$198 per day. Meals fall under the general IRS guideline that they must be ordinary and necessary. Therefore, food and beverage expenses that are extraordinary or lavish beyond this standard are not eligible. Meals for other people or any person other than the employee attending the CME event, whether or not they are traveling with you or attending the conference. Expenses when CME event documentation is not submitted along with the claim for meal expenses. Meal expenses for virtual conferences

CME - Study Materials

General Guidelines	Study materials and textbooks for radiology-related CME courses are eligible. Radiology-related reference materials and general medical reference materials are also eligible.
Restrictions	<u>Non-Medical-Related Materials</u> . Study or reference materials that do not relate directly to the medical profession are not eligible.
Documentation	<p><u>Itemized Receipt</u>. A detailed purchase receipt itemizing the study material purchased. The receipt must outline the following items:</p> <ul style="list-style-type: none"> Date Specific study materials Vendor from whom study materials were purchased <p><u>Most Credit Card Receipts Not Okay</u>. Credit card receipts that show the total purchase only and do not provide specific purchase items are not sufficient. If a credit card receipt includes an itemized accounting of the materials purchased, it will be considered adequate.</p>
Claim Processing Assumptions	<p><u>Itemized Receipt or Invoice</u>. A purchase receipt or invoice is required for documentation. The receipt must outline the following items:</p> <ul style="list-style-type: none"> Date Specific study materials Vendor from whom study materials were purchased

	<p><u>Some Credit Card Receipts Okay.</u> A credit card receipt that provides a detailed description of the study materials (such that the nature of the purchase is clear) is acceptable.</p> <p><u>Most Credit Card Receipts Not Okay.</u> A credit card receipt that shows only the total amount or does not provide a sufficiently detailed description of the study materials is not sufficient.</p>
Eligible Examples	<ul style="list-style-type: none"> • CME course study materials are eligible • Textbooks or similar reference material • Interactive Atlas of Human Anatomy (IMAIOS) Web License
Ineligible Examples	<ul style="list-style-type: none"> • Books or study materials that are not directly related to the profession of radiology or the practice of medicine

CME - Foreign Travel Restrictions

General Guidelines	<p>The IRS restricts travel expenses for any conferences and conventions events held outside of the North American area.</p> <p>Any trips outside of North America are subject to the restrictions and requirements outlined below.</p> <p>The North American area includes the following locations.</p> <table border="0"> <tr> <td>American Samoa</td> <td>Grenada</td> <td>Midway Islands</td> </tr> <tr> <td>Antigua and Barbuda</td> <td>Guam</td> <td>Northern Mariana</td> </tr> <tr> <td>Aruba</td> <td>Guyana</td> <td>Palau</td> </tr> <tr> <td>Bahamas</td> <td>Honduras</td> <td>Palmyra Atoll</td> </tr> <tr> <td>Baker Island</td> <td>Howland Island</td> <td>Panama</td> </tr> <tr> <td>Barbados</td> <td>Jamaica</td> <td>Puerto Rico</td> </tr> <tr> <td>Bermuda</td> <td>Jarvis Island</td> <td>Saint Lucia</td> </tr> <tr> <td>Canada</td> <td>Johnston Island</td> <td>Trinidad and Tobago</td> </tr> <tr> <td>Costa Rica</td> <td>Kingman Reef</td> <td>USA</td> </tr> <tr> <td>Curaçao</td> <td>Marshall Islands</td> <td>U.S. Virgin Islands</td> </tr> <tr> <td>Dominica</td> <td>Mexico</td> <td>Wake Island</td> </tr> <tr> <td>Dominican Republic</td> <td>Micronesia</td> <td></td> </tr> </table>	American Samoa	Grenada	Midway Islands	Antigua and Barbuda	Guam	Northern Mariana	Aruba	Guyana	Palau	Bahamas	Honduras	Palmyra Atoll	Baker Island	Howland Island	Panama	Barbados	Jamaica	Puerto Rico	Bermuda	Jarvis Island	Saint Lucia	Canada	Johnston Island	Trinidad and Tobago	Costa Rica	Kingman Reef	USA	Curaçao	Marshall Islands	U.S. Virgin Islands	Dominica	Mexico	Wake Island	Dominican Republic	Micronesia	
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Restrictions	<p><u>100% Business Travel.</u> The purpose of your business/professional travel must be 100% business. The IRS offers specific guidelines for what qualifies as "100% business travel."</p> <p><u>Personal/Nonbusiness Activities.</u> Personal or nonbusiness activities include time visiting with friends or relatives, vacations, or any leisure activities.</p> <p><u>Vacation not a Major Consideration.</u> Personal vacation must not be a major consideration in the trip.</p>																																				

	<p><u>Conventions Held Outside North America.</u> In general, conventions held outside of the North American area are considered not eligible. There can be some exceptions, however the criteria are very strict and extensive documentation is required. It is important to recognize that the IRS intentionally places very strict restrictions on any foreign travel activity that enables leveraging a business trip for personal or leisure purposes. The following factors are included in the IRS “Reasonableness” test and thus must be met to be eligible under the PPE plan.</p> <ul style="list-style-type: none"> • The purpose of the meeting and the activities taking place at the meeting • The purposes and activities of the sponsoring organizations or groups • The homes of the active members of the sponsoring organizations and the places at which other meetings of the sponsoring organizations or groups have been or will be held • Other relevant factors may be presented <p><u>Exception #1 - 7 Day Maximum.</u> Your trip is considered entirely for business if you were outside the United States 7 days or less, combining business and nonbusiness activities. One week means 7 consecutive days. In counting days, don’t count the day you leave the United States, but do count the day you return to the United States.</p> <p><u>Exception #2 - Less than 25% of Time on Personal Activities.</u> Your trip is considered entirely for business if you were outside the United States for more than a week, and you spent less than 25% of the total time you were outside the United States on nonbusiness activities.</p> <p><u>Example A:</u> You flew from Seattle to Tokyo, where you spent 5 days at a CME conference and 3 days on personal matters. You then flew back to Seattle. You spent 1 day flying in each direction. Because 3/10 days (more than 25%) of your total time abroad was for nonbusiness activities, your expenses are not eligible.</p> <p><u>Example B:</u> You flew from Seattle to Tokyo, where you spent 5 days at a CME conference and 2 days on personal matters. You then flew back to Seattle. You spent 1 day flying in each direction. Because 2/9 days (less than 25%) of your total time abroad was for nonbusiness activities, your expenses are eligible.</p>
<p>Documentation</p>	<p>Documentation for CME courses held outside the North America area must be sufficient to uphold all the IRS criteria outlined above.</p>
<p>Claim Processing Assumptions</p>	<p>No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.</p>

CME - Cruise Ships

<p>General Guidelines</p>	<p>The IRS restricts expenses for attending events held on cruise ships. The limit on total expenses related to a cruise CME event is \$2,000 per year (total for CME event fees, lodging, and meals).</p> <p>Following is an outline of the IRS requirements and restrictions for cruise ship based CME events, which includes any conference, convention, seminar or similar meeting.</p>
<p>Restrictions</p>	<p>\$2,000 in CME expenses occurring on a cruise ship may be considered a potentially eligible expenses if ALL the following requirements are met:</p> <ol style="list-style-type: none"> 1. The cruise ship must be a vessel registered in the United States. (<i>Be aware, there are <u>very</u> few ships registered in the US, primarily because of the Passenger Vessel Services Act of 1886.</i>) 2. All of the cruise ship's ports of call are in the United States or are in possessions of the United States. The U.S. has nine possessions, five of which are inhabited. These include: <ul style="list-style-type: none"> • American Samoa • Guam • Northern Mariana Islands • Puerto Rico • United States Virgin Islands 3. The convention, seminar, or meeting is directly related to the active conduct of your trade or business.
<p>Documentation Requirements</p>	<p>Special claim requirements include:</p> <ol style="list-style-type: none"> 1. The name of the cruise ship must be identified. 2. Attach to your claim submission a written statement signed by you that includes information about: <ol style="list-style-type: none"> a. The total days of the trip (not including the days of transportation to and from the cruise ship port), b. The number of hours each day that you devoted to scheduled business activities, and c. A program outlining the scheduled business activities of the meeting. 3. Attach to your claim submission a written statement signed by an officer of the sponsoring organization that includes: <ol style="list-style-type: none"> a. A schedule of the CME activities for each day of the meeting, and b. The number of hours you attended the scheduled business activities.

	These claim requirements border on the ridiculous. However, they are required by the IRS to substantiate a cruise claim.
Claim Processing Assumptions	<p><u>Transportation is Separate.</u> The \$2,000 maximum per year reflects the total for the CME fees as well as lodging/meals while on the ship). Transportation expenses to and from the initial and final cruise ports of call are considered separate expenses, subject to the normal transportation allowances and restrictions.</p> <p><u>All Ships.</u> The IRS also notes that all ships that sail are considered cruise ships.</p>

Computer/Electronics Equipment

General Guidelines	<p>Computer equipment, computer peripherals, computer accessories, and electronics equipment are eligible when used solely for business purposes.</p> <p>When used partially for personal purposes, only the portion of the cost attributable to business use is eligible.</p>
Restrictions	<p><u>Maximum Reimbursement.</u> All equipment purchases (computer, monitor, etc.) are subject to a \$2,500 per item maximum reimbursement. The \$2,500 reflects the business portion of the cost. For example, a monitor that costs \$4,000 and has a 75%-25% business/personal use allocation would have a \$3,000 business use allocation and be eligible for a \$2,500 reimbursement.</p> <p><u>Business Use Only.</u> Computer equipment that is used for personal purposes is not eligible. To the extent that a computer or computer equipment will be used for any substantive personal use, a Statement of Use declaration of the percentage of personal use must accompany the claim documentation.</p> <p><u>100% Business-Personal Use Assumed.</u> It will be assumed that computers and other technology submitted for reimbursement will be used for 100% business purposes and no personal purposes, except for incidental use.</p> <p><u>Requirements for 100% Business Use.</u> In order to claim 100% business use for a computer (or other technology), participants must maintain another computer (or other technology) to be used for all personal matters for any item that might potentially have any personal use application.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of computer equipment that is otherwise used for 100% business purposes is considered to be no more than a few times per month.</p> <p><u>Alternate Business-Personal Use Percentage.</u> If the computer or other technology will be used a level that deviates from the default 100%</p>

	<p>business-personal use ratio, a Statement of Use declaration must be submitted. The Statement of Use must be received at the same time the claim is submitted.</p> <p><u>Requirements for Statement of Use.</u> The Statement of Use declaration must include the following elements:</p> <ul style="list-style-type: none"> • Name of the participant • Details of the computer or technology purchased • Date of purchase • Specific business-personal use split <p><u>How to Submit Statement of Use.</u> An email, typed note, or handwritten note with the required information is sufficient. The Statement of Use should be included an emailed claim to PPE@vitamail.com or submitted along with the initial claim if submitted online.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of computer or electronics equipment item that is otherwise used for 100% business purposes is acceptable. Incidental personal use of computer or electronics is considered to be no more than a few times per month.</p> <p><u>Personal Use.</u> In order to claim office equipment (including computers) for 100% business use, the IRS requires that the individual have a similar item available for personal use purposes. If no other computer is available for personal use, the IRS requires a declaration of business vs. personal use (on a percentage basis). That percentage usage allocation is then applied to the purchase price to determine the amount eligible (and thus reimbursable).</p> <p><u>Applies to Peripherals.</u> Eligible computer peripherals follow the same business/personal use allocation rules as outlined above for computers.</p> <p><u>Limited to One of Each Computer Type.</u> IRS requirements outline that business expenses must be ordinary and necessary. The application of this requirement for the PPE plan as applied to computer equipment is no more than one of each type of computer equipment (laptop, tablet, docking station, other peripherals, etc.) is eligible each calendar year.</p> <p><u>Limit of Two Monitors.</u> When two monitors are purchased for use in a dual-monitor configuration, both monitors are eligible.</p>
<p>Documentation</p>	<p><u>Receipt or Invoice.</u> A purchase receipt or invoice is required for documentation. The receipt must itemize the specific computer equipment purchased, the amount of the purchase, and the date of the purchase.</p> <p><u>Some Credit Card Receipts Okay.</u> A credit card receipt that provides a detailed description of the equipment purchased such that it is clear the exact type of computer/electronics item purchased is acceptable.</p>

	<p><u>Many Credit Card Receipts Not Okay.</u> A credit card receipt that shows only the total amount or does not provide a sufficiently detailed description of the computer or electronics equipment purchased is not eligible.</p>
<p>Claim Processing Assumptions</p>	<p><u>100% Business Use Assumed.</u> It will be assumed that computer/electronics equipment that is submitted for reimbursement will be used for 100% business purposes.</p> <p><u>Personal Use Declaration.</u> If the computer equipment or electronics equipment will be used for personal purposes at a level that deviates from the default, participants must include a statement declaring the business/personal use allocation at the same time the claim is submitted.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of computer equipment that is otherwise used for 100% business purposes is considered to be no more than a few times per month.</p> <p><u>Exceptions to Maximum Number.</u> In rare situations, exceptions can be made to the maximum limit of one per type of equipment. In order to qualify for an exception, the special circumstance must be documented in a clear and compelling manner. Exceptions would typically be granted for events such as loss, theft, fire, etc.</p> <p><u>Two Monitors.</u> When two monitors are purchased, it will be assumed that they are used in a dual-monitor configuration and thus are both eligible.</p> <p><u>Assumed Claim Amount.</u> Claims will be processed assuming the default allocation is the requested reimbursement amount. This means that the claim amount entered will equal the default allocation amount regardless of what is put on the claim form or reflected on the bill. Amounts over the default amount will not be reimbursed but will also not show as denied expenses.</p>
<p>Eligible Examples</p>	<ul style="list-style-type: none"> • Computer • Monitor • Printer/Scanner/Fax • Docking station • Tablet/iPad • Mouse • Modem/VOIP Phone (including installation cost) • Computer warranty plan. • Headphones (only reimbursable up to 50%) • Computer sound bar • Dictation Equipment • Charging cords/devices • Computer/laptop protective case

<p>Ineligible Examples</p>	<ul style="list-style-type: none"> • Multiple laptops • Televisions (any item that is marketed as a TV, regardless of whether it is used for business purposes). We recognize that there are TVs and monitors today that are marketed and used for overlapping purposes, however the PPE plan uses a bright line determination of eligibility. If the product name on the receipt is “monitor” (regardless of the size and potential dual use) it is eligible. If the product name on the receipt is “TV or Television” (regardless of whether it might be dually used as a monitor) is not eligible. • Smart Watches (Apple watch, Garmin watch, etc.), even if they can be connected to the internet and be a device to receive electronic notifications. • Special USB drives that are used for accessing Bitcoin • Entertainment sound system (even if it is used in conjunction with a computer setup and even if used to listen to medically related materials) • Single use electronic devices, such as Portal or other such video devices. (While it could be argued they are used for work-based video conferencing, they are generally marketed for personal use purposes, thus are considered too difficult an expense to document under the PPE plan.) • Home security equipment (even if it is used for security of a home office) • Portion of charges allocated for personal use • Augmented Reality/Virtual Reality Headsets (Apple Vision Pro, Meta Quest 2, HTC Vice Cosmos Elite, Valve Index VR Kit, etc.)
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Internet Expenses

<p>General Guidelines</p>	<p>Generally, monthly internet service fees are not eligible under the PPE program. These expenses are handled under each practice’s internet/phone stipend program.</p> <p>Physicians that have work at home arrangements that require duplicative internet services that exceed the stipend are eligible for reimbursement under the PPE plan (subject to full documentation and a personal/business usage allocation on one of the two internet expense services).</p>
<p>Restrictions</p>	<p><i>The following claim guidelines apply only to those physicians with work at home arrangements described above.</i></p>

	<p><u>Only Business Use.</u> Eligible expenses for internet are limited to the amount that is used for business purposes, not personal purposes.</p> <p><u>Bundled Plan Bills.</u> Many internet providers offer bundled plan arrangements (internet bills, TV, phone, etc.) for multiple services, however, only the amount that is actually attributable to internet is reimbursable. This means that the expense must be either stated or extrapolated from the billing statement.</p>
<p>Documentation</p>	<p><u>Verification of Work Requirement.</u> Attestation or documentation of work at home arrangement that requires duplicative internet services.</p> <p><u>Copy of Full Bill.</u> A copy of the monthly billing statement including all pages that detail the monthly service charges.</p> <p><u>Insufficient Documentation.</u> Partial billing statements that show only a summary of charges (first page only) and not the detailed breakout of all charges are not sufficient.</p>
<p>Claim Processing Assumptions</p>	<p><u>Base Internet Fee.</u> The base fee charged for the internet access is considered an eligible expense. The full cost is eligible without any proration.</p> <p><u>Taxes and Fees.</u> Charges for taxes and fees are eligible. The full amount of taxes and fees are reimbursable without proration.</p> <p><u>Business Use Percentage.</u> Only the eligible internet cost is eligible for reimbursement. For duplicative internet service, 100% business use is assumed.</p> <p><u>Bundled Plan Bills.</u> Many internet providers offer bundled plan arrangements (phone, internet bills, TV, etc.) for billing. When no specific allocation for internet vs. non-internet charges are outlined, services are not eligible for reimbursement.</p> <p><u>Accountholder Name/Address.</u> The accountholder name or address on the billing statement must match the participant's name or address on file in the Vita PPE administration system. When the name or address does not match, a statement explaining the difference will be accepted for a two-month transition period (to accommodate when names or addresses are in transition).</p>
<p>Eligible Examples</p>	<ul style="list-style-type: none"> • Expenses in excess of the internet/phone stipend (for physicians with a work at home arrangement that requires duplicative internet service) • Base internet services • Internet speed booster charges • Modem service charges • Taxes and fees

	<ul style="list-style-type: none"> • Activation fees • Taxes, fees, and surcharges (not apportioned to specific services on bundled bills)
Ineligible Examples	<ul style="list-style-type: none"> • Internet service charges for physicians without a work at home arrangement that requires duplicative internet service • Any amount already reimbursed via the internet/phone stipend program • Any non-internet charges (such as TV or channel package) • Portion of charges allocated for personal use

Licenses/ Credentialing Fees

General Guidelines	Fees required for licensing or credentialing are eligible under the PPE plan.
Restrictions	<p><u>Current Tax Year Only.</u> The full amount of licensing fees paid in a given tax year are eligible in the plan year that coincides with that tax year. Even if an annual license fee is paid for a period that crosses over the calendar year, the full amount of the fee that is paid is eligible in the year in which the fee is paid.</p> <p><u>No Proration.</u> Licensing fees are not pro-rated based on the calendar year. The full amount is eligible in the calendar year in which it is paid.</p>
Documentation	<p><u>Payment Receipt or Invoice.</u> A receipt or invoice is required for documentation. The receipt must outline the following items:</p> <ul style="list-style-type: none"> • Physician name • Type of License /Licensing Entity • Fee paid • Date fee paid <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts do not provide all of the required elements and thus are not sufficient documentation.</p>
Claim Processing Assumptions	No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.
Eligible Examples	<ul style="list-style-type: none"> • State licensing fees • Credentialing fees
Ineligible Examples	<ul style="list-style-type: none"> • Licensing or credentialing fees for a year other than the current tax year.

Malpractice Insurance

General Guidelines	<p>Premiums for supplemental malpractice insurance are eligible under the PPE plan.</p> <p>For Tail Malpractice Insurance payments please refer to section: Malpractice Insurance Tail Coverage</p>
Restrictions	<p><u>Radiology Partners Only.</u> Only malpractice insurance providing coverage for and while working at Radiology Partners is eligible. Coverage for a different employment arrangement (self-employed or another employer) is not eligible.</p> <p><u>While Employed Only.</u> Only coverage for a period of time while employed at Radiology Partners is eligible. Coverage for a period of time prior to employment is not eligible.</p> <p><u>No Proration.</u> Premiums are not pro-rated based on the calendar year. The full premium amount is eligible in the calendar year in which it is paid.</p>
Documentation	<p><u>Premium Billing Statement.</u> Two documentation elements are required: A premium billing statement and a copy of the policy declaration page. The billing statement must outline the following items:</p> <ul style="list-style-type: none"> • Physician name • Type of coverage • Period of coverage • Policy declaration page <p>The policy declaration page is typically the first page of the policy that outlines the insured, the policy period, and the terms of the coverage.</p> <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts do not provide all of the required elements and thus are not sufficient documentation.</p>
Claim Processing Assumptions	<p>No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.</p>
Eligible Examples	<ul style="list-style-type: none"> • Supplemental malpractice insurance
Ineligible Examples	<ul style="list-style-type: none"> • General personal liability insurance

Malpractice Insurance Tail Coverage

General Guidelines	<p>Medical malpractice insurance that covers claims made after active employee malpractice insurance policy has expired or been canceled as a result of employment termination.</p>
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Restrictions	Must be terminated or terminating employment with Radiology Partners.
Documentation	None: Request must come from the Radiology Partners Human Resources team.
Claim Processing Assumptions	No specific assumptions are made. Expenses are reimbursed based on information from Radiology Partners Human Resources team.
Eligible Examples	None
Ineligible Examples	Active employee malpractice insurance

Office Furnishings

General Guidelines	Office furnishings that are necessary for business purposes are eligible expenses.
Restrictions	<p><u>Maximum Reimbursement.</u> All office furnishing expenses (desk, etc.) are subject to a \$2,500 per item maximum reimbursement. The \$2,500 reflects the business portion of the cost. For example, a desk that costs \$3,000 and with a 100% business use allocation would be capped at a \$2,500 reimbursement.</p> <p><u>Business Use Only.</u> Office furnishings that are used for personal purposes are not eligible. To the extent that office furnishings are used for any substantive personal use, a declaration of the percentage of personal use must accompany the claim documentation.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of an item that is otherwise used for 100% business purposes is acceptable. Incidental personal use of office equipment or supplies is considered to be no more than a few times per month.</p> <p><u>Personal Use.</u> The IRS generally requires that individuals have other such office furnishings available for personal use purposes in order to claim the office equipment for 100% business use. If no such office furnishings are available for personal use, a declaration of business vs. personal use (on a percentage basis) must be made. That percentage usage allocation is then applied to the purchase price to determine the amount eligible (and thus reimbursable). For purposes of reimbursement of office furnishings under the PPE plan, an incidental-only personal use assumption is made. If personal use exceeds incidental levels, a statement providing alternate business/personal use allocation must be provided at the time the claim is submitted.</p> <p><u>Purchase Limits - Furnishings.</u> IRS requirements outline that business expenses must be ordinary and necessary. The application of this requirement for the PPE plan for office furnishings is no more than one of each type of major furnishings (desk, chair, etc.) is eligible each calendar year.</p>

<p>Documentation</p>	<p><u>Receipt or Invoice.</u> A purchase receipt or invoice is required for documentation. The receipt must itemize the specific office equipment or supply purchased, the amount of the purchase, and the date of the purchase.</p> <p><u>Some Credit Card Receipts Okay.</u> A credit card receipt that provides a detailed description of the office furnishings such that it is clear the exact type of office equipment item purchased is acceptable.</p> <p><u>Many Credit Card Receipts Not Okay.</u> A credit card receipt that shows only the total amount or does not provide a sufficiently detailed description of the specific nature of the office furnishings is not eligible.</p>
<p>Claim Processing Assumptions</p>	<p><u>100% Allocation Assumed.</u> An allocation of 100% business use will be assumed for all office furnishings that are submitted for reimbursement. It is assumed that such expenses will be used primarily for business purposes.</p> <p><u>Alternative Declaration.</u> In the case where personal use deviates from the default assumption, a participant may provide an alternate declaration of business/personal allocation. Such an alternate declaration should be submitted at the same time the claim is submitted.</p> <p><u>Exceptions to Maximum Number.</u> In rare situations, exceptions can be made to the maximum limit of one per type of office furnishings. In order to qualify for such an exception, the special circumstance must be documented in a clear and compelling manner. Exceptions would typically be granted for events such as loss, theft, fire, etc.</p>
<p>Eligible Examples</p>	<ul style="list-style-type: none"> • Desk or workstation • Desk chair • Desk lamp • Ergonomic support equipment • Sit/stand desk equipment
<p>Ineligible Examples</p>	<ul style="list-style-type: none"> • Other office furnishings such as side chairs, tables, bookshelves, or cabinets (while it could be argued that such furnishings are integral to an office setup, the line between business and personal use is too slippery to allow such items to be reimbursed under the PPE plan). • Under desk treadmill or other while-working exercise equipment (while it could be argued this is a mode of working in an office, it would not be considered ordinary and necessary by the IRS). • Personalized office furnishings and personal comfort items such as cushions or massage devices. • LED strip lighting

Office Equipment, Office Supplies, and Business Services

<p>General Guidelines</p>	<p>Office equipment and supply purchases and certain business services that are necessary for business purposes are eligible expenses under the PPE plan.</p>
<p>Restrictions</p>	<p><u>Business Use Only.</u> Office equipment that is used for personal purposes is not eligible. To the extent that office equipment or supplies are used for any substantive personal use, a declaration of the percentage of personal use must accompany the claim documentation.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of an item that is otherwise used for 100% business purposes is acceptable. Incidental personal use of office equipment or supplies is considered to be no more than a few times per month.</p> <p><u>Personal Use.</u> The IRS generally requires that individuals have similar office equipment available for personal use purposes in order to claim the office equipment for 100% business use. If no such office item is available for personal use, the IRS requires a declaration of business vs. personal use (on a percentage basis). That percentage usage allocation is then applied to the purchase price to determine the amount eligible (and thus reimbursable).</p> <p><u>Purchase Limits.</u> Office supplies are limited to reasonable quantities that would be presumed to be used within one year.</p>
<p>Documentation</p>	<p><u>Receipt or Invoice.</u> A purchase receipt or invoice is required for documentation. The receipt must itemize the following:</p> <ul style="list-style-type: none"> • Office equipment, supplies, or business service purchased • Amount of the purchase • Date of the purchase <p><u>Some Credit Card Receipts Okay.</u> A credit card receipt that provides a detailed description of the office equipment or supplies such that it is clear the exact type of office equipment item purchased is acceptable.</p> <p><u>Many Credit Card Receipts Not Okay.</u> A credit card receipt that shows only the total amount or does not provide a sufficiently detailed description of the specific nature of the office equipment or supplies is not eligible.</p>
<p>Claim Processing Assumptions</p>	<p><u>100% Business Use Assumed.</u> It will be assumed that office equipment and supplies that are submitted for reimbursement will be used for 100% business purposes.</p> <p><u>Personal Use Declaration.</u> If the office equipment or supplies will be used for personal purposes, participants must include a declaration of the business/personal use allocation at the same time the claim is submitted.</p> <p><u>Incidental Personal Use.</u> Incidental personal use of office equipment that is otherwise used for 100% business purposes is considered to be no more than a few times per month.</p>

	<p><u>Personal Backup Separate.</u> It is assumed that claimed charges for backup services are for business data backup only and that charges would be separate (and not submitted) for any personal data storage.</p> <p><u>Exceptions to Maximum Number.</u> In rare situations, exceptions can be made to the maximum limit of one per type of office equipment. In order to qualify for an exception, the special circumstance must be documented in a clear and compelling manner. Exceptions would typically be granted for events such as loss, theft, fire, etc.</p>
<p>Eligible Examples</p>	<ul style="list-style-type: none"> • Online data storage (only that portion required for RP business) • MS Office Software or other software package required for business • Subscription for computer backup services (Google, Box, etc.) • Post Office mailbox rental fees (only if used exclusively to receive business mail) • Postage/Shipping Costs (only that required for RP business) • Stapler • Printer paper • General office supplies
<p>Ineligible Examples</p>	<ul style="list-style-type: none"> • Quantities of any office supplies that would be deemed beyond reasonable • Backup subscription service costs for any materials that backup personal data • Fireproof bag or other fire safety equipment

Other Professional Expenses

General Guidelines	Other professional expenses that are ordinary and necessary business expenses are eligible.
Restrictions	<u>Clothing</u> . Certain medically specific garments (such as scrubs or white coats) are considered necessary for business assuming they are not provided by Radiology Partners. This includes clothing of any kind if it can be repurposed for personal use (regardless of whether it may also be used for business purposes). Necessary embroidery on medical attire is considered eligible.
Documentation	No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.
Claim Processing Assumptions	No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.
Eligible Examples	<ul style="list-style-type: none"> • Scrubs • White coat purchase • Embroidery for white coat • Blackout curtains (for home office only) • Lead glasses • State licenses outside of practicing/required state • Lead Apron
Ineligible Examples	<ul style="list-style-type: none"> • Shoes, even if they are used solely for work (because they are considered dual-purpose items and could be worn at other times) • Non-medically specific clothing • Exam for procuring lead glasses

Professional Association Memberships

General Guidelines	Membership or dues fees for radiology-related professional associations are an eligible expense.
Restrictions	<u>One Year Period Only.</u> Payment for membership for a period longer than one year is not eligible.
Documentation	<p><u>Billing Statement.</u> A copy of the billing statement or payment confirmation is necessary. The statement must include the following:</p> <ul style="list-style-type: none"> • Physician name • Professional association name • Billing period • Date paid <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts that show the total only and do not provide specific purchase items are not sufficient.</p>
Claim Processing Assumptions	Claims are reimbursed based on the date the membership fee was paid. This applies even if it is an annual membership, and a portion of the period falls in a future calendar year.
Eligible Examples	<p><u>For Physicians</u></p> <ul style="list-style-type: none"> • American College of Radiology (ACR) • American Medical Association (AMA) • American Osteopathic Board of Radiology (AOBR) • American Osteopathic College of Radiology (AOCR) • American Registry of Radiologic Technologists (ARRT) • American Roentgen Ray Society (ARRS) • American Society of Emergency Radiology (ASER) • American Society of Neuroradiology (ASNR) • American Society of Pediatric Neuroradiology (ASPNR) • Certification Board of Radiology Practitioner Assistants (CBRPA) • International Society for Clinical Densitometry (ISCD) • Radiological Society of North America (RSNA) • Society for Pediatric Radiology (SPR) • Society for Skeletal Radiology (SSR) • Society of Breast Imaging (SBI) • Society of Interventional Radiology (SIR -formerly SCVIR) • STADx Membership (CME/CME Tracking) • Texas Medical Association (TMA) • Texas Organization of Rural & Community Hospitals (TORCH)

	<p><u>For Physician Assistants</u></p> <ul style="list-style-type: none"> • Association of Physician Assistants • American Academy of Physician Assistants
Practice Paid Expenses	If an arrangement has been made for the practice to pay for a number of memberships, these claims must be submitted to Accounts Payable via Workday.
Ineligible Examples	<ul style="list-style-type: none"> • Memberships for more than one year in duration • Memberships for a period of time that does not correspond to the calendar year in which payment was made.

Professional Subscriptions

General Guidelines	Expenses for subscriptions to professional journals, trade journals, and technical journals are eligible under the PPE plan.
Restrictions	<p><u>Radiology Related.</u> Journals and subscriptions must be related to the profession of radiology.</p> <p><u>One Year Period Only.</u> Payment for a period longer than one year is not eligible.</p>
Documentation	<p><u>Billing Statement.</u> A copy of the billing statement or payment confirmation is necessary. The statement must include the following:</p> <ul style="list-style-type: none"> • Physician name • Professional subscription or journal name • Date purchased • Billing period <p><u>Credit Card Receipts Not Okay.</u> Credit card receipts that show the total only and do not provide specific purchase items are not sufficient.</p>
Claim Processing Assumptions	No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted
Eligible Examples	<ul style="list-style-type: none"> • American Journal of Neuroradiology • Applied Radiology • Clinical Imaging • Clinical Radiology • Concepts in Magnetic Resonance • European Journal of Radiology • European Radiology • Human Brain Mapping

	<ul style="list-style-type: none"> • Journal of Magnetic Resonance Imaging • Journal of the American College of Radiology • New England Journal of Medicine • Ultrasound in Medicine and Biology • X-Ray Spectrometry
Ineligible Examples	<ul style="list-style-type: none"> • Journal subscriptions for longer than one year • Journals not specifically related to the radiology profession

Publication Fees

General Guidelines	Fees necessary to publish in scientific or scholarly journals or to access scientific or scholarly journal publications are business expenses that are eligible under the PPE plan.
Restrictions	<u>Employee Only</u> . Only publishing fees required for an employee's research to be published are eligible.
Documentation	<p><u>Billing Statement</u>. A copy of the billing statement and confirmation of payment of the expense is necessary. The statement must include the following:</p> <ul style="list-style-type: none"> • Physician name • Journal for publication • Title of paper • Amount of fee • Date paid <p><u>Credit Card Receipts Not Okay</u>. Credit card receipts that show the total only and do not provide specific purchase items are not sufficient.</p>
Claim Processing Assumptions	No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.
Eligible Examples	<ul style="list-style-type: none"> • Fees required for publication of a scientific paper in a journal • Fees required for publication of a thesis a professional journal
Ineligible Examples	<ul style="list-style-type: none"> • Fees to make a thesis document or other scientific or scholarly paper into a publishable or keepsake book.

Software Tools

General Guidelines	Expenses for radiology-specific software or other business tools to enhance business efficiency are eligible under the PPE plan.
Restrictions	<p><u>Radiology Related</u>. Must be specifically related to the profession of radiology.</p> <p><u>One Year Period Only</u>. Payment for a period longer than one year is not eligible.</p> <p>Duplicative Tools. Any software or business tools that could be used or could also be used for non-radiology purposes are not eligible.</p>
Documentation	<p><u>Billing Statement</u>. A copy of the billing statement or payment confirmation is necessary. The statement must include the following:</p> <ul style="list-style-type: none"> • Physician name • Professional subscription or journal name • Date purchased • Billing period <p><u>Credit Card Receipts Not Okay</u>. Credit card receipts that show the total only and do not provide specific purchase items are not sufficient.</p>
Claim Processing Assumptions	Radiology Partners has arranged a corporate discount for individual radiologists who choose to purchase the RadAI product. The discounted pricing is \$1,800 for the annual subscription; therefore, a maximum of the \$1,800 cost is considered eligible.
Eligible Examples	<ul style="list-style-type: none"> • RadAI service
Ineligible Examples	<ul style="list-style-type: none"> • Services paid for longer than one year • Services not specifically related to the radiology profession

Travel Expenses - Non-Commute Mileage & Tolls

General Guidelines	Mileage expenses and tolls are eligible to the extent travel is required <u>between</u> work sites (for example, between the clinic and hospital). The IRS mileage rate for 2024 is \$0.67 per mile.
Restrictions	<p><u>No Commute Travel</u>. Regular travel expenses (mileage, tolls, etc.) for commuting to and from work are not eligible under the plan. This includes a commute to any work location, even if it is not your normal work location (for example, a hospital or clinic location that is not your regular work location).</p> <p><u>Commute Defined</u>. The rule of thumb is that from your home to your first work location is considered part of your commute. Additionally, going from your last work location to your home is considered part of your commute. Travel in between work locations in between your two commute segments is considered eligible business travel.</p> <p><u>IRS Guidelines</u>. The IRS requires that mileage be logged and</p>

	<p>documented. While the IRS allows for both actual expense and standard mileage allowance, the PPE plan only allows for the standard mileage method. As such the actual cost of gas for a trip is not reimbursable under the plan. Rather, the cost of gas is assumed to be included in the standard mileage allowance. See the documentation section below for the required documentation elements.</p> <p><u>On Call Mileage</u>. Mileage expense for traveling to a hospital (from home) falls into the commute category (and thus is not eligible). If a physician is at a clinical office and needs to go to the hospital, that would qualify as business travel.</p>
Documentation	<p>Documentation of mileage is completed via personal attestation and must state that the expense is for <u>business travel</u> and must include the following elements for each leg of your CME travel via personal vehicle:</p> <ul style="list-style-type: none"> • Date of travel • Starting point of trip • Ending point of trip <p>Google Maps image for each leg of the trip which shows the starting point, the ending point, and the total mileage for each leg.</p>
Claim Processing Assumptions	<p>No specific assumptions are made. Expenses are reimbursed based on the specific claims submitted.</p>
Eligible Examples	<ul style="list-style-type: none"> • Mileage for business travel between worksites during worktime. <p>Expenses for tolls (bridge, tollway, etc.) incurred during business travel</p>
Ineligible Examples	<ul style="list-style-type: none"> • Mileage for traveling from home to a worksite for on call duty. • Mileage for traveling to a worksite while on call. • Fuel expenses (and other car expenses) for driving to a CME meeting (these costs are subsumed in the mileage allowance).

Ineligible Expenses

This section outlines claims that are not eligible under the PPE Plan. A description of the reasons that these types of claims are not eligible is also provided when appropriate.

In general, expenses that are not considered tax deductible business expenses are not eligible for reimbursement. Importantly, some expenses that might otherwise be considered deductible business expenses for a sole proprietor (an individual physician in business filing a Form 1040 Schedule C) are not considered eligible under this PPE plan. This is because the nature of this PPE plan presumes a regular employment relationship with wages reported on a W2 and taxes withheld by the employer. There are a number of expenses that would be potentially deductible in a sole proprietor situation that are simply not suitable for a salary reduction arrangement such as this PPE arrangement.

While not an exhaustive list, examples of ineligible expenses include:

<p>Business Use of Home</p>	<p>Expenses pursuant to business use of your home are not eligible. The IRS guidelines restrict such deductions to exclusive use of a home as the principal place of business or exclusive place to meet with patients, clients, or customers. This would include any expenses outlined in IRS Publication 587.</p>
<p>Business Use of Car</p>	<p>Expenses for business use of a personal car are not eligible (except for direct mileage, tolls, and parking fees)</p>
<p>Cable TV or Streaming Service Fees</p>	<p>These expenses are deemed not business related and thus are not eligible.</p>
<p>Capital Expenses</p>	<p>Capital expenses of any kind are not eligible under the plan. A capital expense reflects any expense that would be required to be reported on Form 1040, Schedule C. If a Schedule C is not file, a standard definition would be any item that is attached to a home or may increase the value of a home.</p>
<p>Cell Phone Service</p>	<p>Charges for monthly cell phone service are not eligible under the plan. They are reimbursed under each practice’s cell phone/internet stipend program.</p>

<p>Claims Filed Without Full Documentation</p>	<p>Documentation <i>must</i> accompany all claims and must satisfy the IRS requirements for business expense documentation. This typically means the following elements must be included: your name (RP physician), service or product provider, description of product or service paid for, date the product or service was rendered (CME course date, membership dates, etc.), and the date paid.</p>
<p>Clothing or Shoes</p>	<p>Shoes or clothing that is not specifically required in the medical profession or that could be used in a setting other than for work as a radiologist are not eligible.</p>
<p>Commute Travel - Regular</p>	<p>Commute travel expenses are not eligible. This includes mileage expenses, tolls, and routine car maintenance.</p>
<p>Commute Travel - Different City</p>	<p>Commuting expenses for travel to a different city are not eligible, even if required as part of a work obligation. This includes hotel, meals, mileage, and other travel expenses, even if an overnight stay is required. In certain circumstances, reimbursement for these expenses may be made directly by Radiology Partners. Any such arrangement would be agreed upon in advance and expenses would be submitted through Expensify.</p>
<p>Depreciation Expenses</p>	<p>Depreciation expense is not eligible under the plan.</p>
<p>Dual Purpose Items</p>	<p>Any item which might be used for business but could also be used for personal purposes or is typically used for personal purposes is not eligible. Examples of such expenses include shoes, or a blanket purchased to be able to sleep on a night shift. Substantiation for sole business use is too difficult.</p>
<p>Entertainment Expenses</p>	<p>Entertainment expenses (nor anything remotely resembling entertainment) are not eligible.</p>
<p>Family Expenses (or Guest Expenses)</p>	<p>In no event are expenses for family or guests eligible under the plan. This includes:</p> <ul style="list-style-type: none"> • Meal expenses, even if they are traveling with the participant to a CME event. • Travel expenses, even if they are traveling with the participant to a CME event. • Cell phone expenses, including expenses for a family cell phone plan • Internet expenses • Electronics purchases or expenses

Gift Expenses	Expenses for gifts, whether for business promotion or for recognition/appreciation of staff are not eligible.
Gift Cards	Gift cards of any kind are not eligible.
Insurance	Standard homeowners' insurance or liability/umbrella policy coverage is not eligible for reimbursement.
Internet Service Fees	Internet service fees are not eligible under the PPE plan as they are provided for under each practice's Internet/Phone stipend. (Exception as specified for participants with contractual duplicative internet service requirements.)
Home Equipment	Equipment is used or which could be used for general homeowner purposes is not eligible. An example would be a power generator or solar panels, even if they might enable work in a home office.
Home Improvement Expenses	Even if for an office in a home.
Late Fees	Late fees or billing costs incurred as payment penalties are not eligible.
Lodging at Relative/Friend's Home	Lodging costs for which no charge is generally made or for which commercial receipts are not available. For example, no reimbursement is available if staying at the home of a relative or friend when no cost would typically be incurred.
Meal/Food Expenses	Meal/food expenses are not eligible unless incurred specifically while traveling for CME. In addition, meals for promotional purposes, hospital or office staff, or employee appreciation events are not eligible. Food, drinks, or meals purchased for multiple people for consumption at a meeting is not eligible. This includes expenses for items such as breakfast food for an early morning meeting or lunch for a business meeting.

Medical Expenses	Expenses related to medical or healthcare, including physician visits and eye exams, are explicitly not eligible for reimbursement under the plan. Additionally, over-the-counter medications and personal care items like Advil or hand sanitizer, even if used to aid in business or radiology services, are not eligible for reimbursement. It's important to note that prescription glasses fall under the category of healthcare expenses and are therefore not eligible for reimbursement.
Non-Current Tax Year Expenses	Claims incurred in a different tax year (other than the current plan year) are not eligible. Specifically, claims submitted (that otherwise would be eligible) are not eligible if they are submitted for reimbursement from funds that came from a different tax year.
Non-IRS Qualified Expenses	Any expenses that would not be deemed an eligible business deduction by IRS standards (based on published guidance and standard documentation requirements) are not eligible.
On Call Travel	Travel (hotel, transportation, and meal) expenses for on-call travel are not eligible under the PPE plan. Expenses for on-call travel may be reimbursable under the physician's practice. Such expenses should be redirected to Expensify.
Parking Expenses	Parking expenses for normal, daily parking for work are not eligible under the PPE program. The IRS allows a certain portion of parking expenses to be paid on a pre-tax basis (via salary reduction). These expenses should be submitted under the Vita Flex Commute/Parking program.
Personal Expenses	Any expenses of a personal nature are not eligible. All expenses must be specifically business-related to be eligible.
Phone Service Fees	Cell phone and land line phone service fees are not eligible to the extent they are covered under the Internet/Phone stipend.
Relocation Expenses	Expenses pursuant to a work relocation are not eligible under the PPE plan. In certain circumstances, reimbursement for these expenses may be made directly by Radiology Partners. Any such arrangement would be agreed upon in advance and expenses would be submitted through Expensify.
Special Electronics	While a standard USB storage device may be considered eligible, a special USB device/credit stick that is enabled for unencrypting a device for Bitcoin access is not eligible.
Student Loan Payments	Student loan payments are not eligible under the PPE plan. Previously, student loan payments were considered eligible for reimbursement under the plan. This is a change to eligibility requirements.

Generally, if an expense is not specifically listed as eligible (in the Eligible Expense section), it is not eligible.

For questions on expenses that are not specifically outlined as eligible and also not specifically listed as ineligible, please reach out to the team at Vita to confirm whether they are eligible or not. Email: help@vitamail.com.

IRS References

The tax deductibility of expenses under this plan follows IRS guidelines for deductible business expenses. To that end, the IRS has provided important resource documents for taxpayers. These documents serve as a guide for both eligibility and required documentation for plan expenses that are outlined as eligible under the plan.

Please note, not all expenses that might be deductible for individual taxpayers or independent contractors (and thus outlined in these IRS reference documents) are eligible under the Radiology Partners PPE plan.

Publication 535, Business Expenses [Link](#)

Publication 463, Travel, Entertainment, Gift, and Car Expenses [Link](#)

Standard Mileage Rates [Link](#)