

# CONFLICT OF INTEREST

## PURPOSE

To ensure that all organization personnel, as well as members of the Governing Body and advisory boards, adhere to organizational guidelines for professional conduct.

## POLICY

The affairs of the organization by all personnel (including Governing Body and Professional Advisory Committee members) will be conducted in accordance with the highest standards of integrity. There can be no deviation from complete honesty in business transactions. Use of organization funds or internal business information for improper purposes and dishonest practices is absolutely forbidden.

## GUIDELINES

1. The organization will ensure that:
  - A. Ethical patient care issues will be referred to the ethics committee.
  - B. All marketing literature will be reviewed with the marketing/planning director or risk management personnel to ensure that services promoted are provided.
  - C. Billing practices will be monitored for accuracy to ensure that only services provided are billed.
  - D. The Governing Body and senior management personnel will be accountable to the conflict of interest policy, related to disclosure of any benefit.
  - E. If a patient requires transfer to another organization, he/she will be informed of any financial benefit to the organization, and provided the option to choose a provider of their choice.
2. Members of the Governing Body and executive personnel will:
  - A. Act in the course of their duties solely in the best interests of the organization without consideration to the interests of any other organization with which they are associated, and to refrain from taking part in any transaction where such person(s) do not believe in good faith that they can act with undivided loyalty to the organization.
  - B. Disclose any material, financial or other beneficial interest to any entity engaged in the delivery of goods or services to the organization or its members.
  - C. Annually disclose any transactions with the organization that would result in any benefit to themselves, their immediate families, or any entity in which they hold a significant financial ownership or other interests, and refrain from participation in any action on such matters except upon approval of the Governing Body after full and frank disclosure.
  - D. Refrain from utilizing any inside information as to the business activities of the organization for the benefit of themselves, their immediate families or any entity with which they may be associated.
3. During the orientation process, all personnel will be required to sign an employment agreement that includes statements related to:
  - A. Confidentiality
  - B. Noncompetition
  - C. Return of records, papers, and equipment
4. All personnel will agree to devote his/her best efforts to the company and not directly or indirectly be engaged in or connected with any other commercial pursuits whatsoever without written authorization of the organization.
5. In the event that a situation arises whereby organization personnel could use confidential or privileged organization information for personal gain, they are obligated to report that potential to the Executive Director/Administrator.
6. Disclosure of a potential conflict and the Executive Director's/Administrator's decision regarding the actions will be noted in a log file kept by the Executive Director/Administrator.

7. No full-time salaried organization staff member will engage in private practice of a service similar to that provided by the organization within the geographic area serviced by the organization, without the written permission of the Executive Director/Administrator. Persons violating this policy will be subject to probation or termination.
8. In the event that a situation arises whereby a member of the Governing Body or senior management personnel could use confidential or privileged organization information for personal gain, he/she is obligated to report in writing, that potential to the Governing Body.
9. The Governing Body will render a decision of that member's eligibility to be part of voting, if applicable.
10. Disclosure of a potential conflict and the Governing Body's decision regarding voting will be noted in the minutes of the meeting.

**Attestation Statement:** I have read the Conflict of Interest policy set forth above and agree to comply fully with its terms and conditions at all times during my service as an employee or Governing Body/Professional Advisory Committee member. If at any time following the submission of this form, I become aware of any actual or potential conflicts of interests, or if the information provided below becomes inaccurate or incomplete, I will promptly notify the Executive Director/Administrator in writing.