

<i>Procedure Title</i>	<b>Conflict of Interest - Caregivers</b>		<i>Procedure No.</i>	<b>ADM-0925</b>
			<i>Policy No.</i>	<b>ADM-0519</b>
<i>Department</i>	<b>Organizational Integrity</b>		<i>Effective Date</i>	<b>08-23-16</b>
<i>To Review</i>	<b>System Policy Committee</b>		<i>Page Number</i>	<b>1 of 4</b>
<i>Last Review</i>	<b>Acute Care</b>	<b>08-23-16</b>	<b>Critical Access</b>	<b>08-23-16</b>
<i>Next Review</i>	<b>Acute Care</b>	<b>08-23-19</b>	<b>Critical Access</b>	<b>08-23-17</b>

- |  |  |   |
|--|--|---|
| <input checked="" type="checkbox"/> Cottage Grove Medical Center | <input checked="" type="checkbox"/> Peace Island Medical Center      | <input checked="" type="checkbox"/> St. John Medical Center       |
| <input checked="" type="checkbox"/> Ketchikan Medical Center     | <input checked="" type="checkbox"/> Sacred Heart River Bend          | <input checked="" type="checkbox"/> St. Joseph Medical Center     |
| <input checked="" type="checkbox"/> Peace Harbor Medical Center  | <input checked="" type="checkbox"/> Sacred Heart University District | <input checked="" type="checkbox"/> United General Medical Center |
| <input checked="" type="checkbox"/> PeaceHealth Medical Group    | <input checked="" type="checkbox"/> Southwest Medical Center         |   |

## SCOPE

This Procedure applies to all PeaceHealth Divisions (PHDs), including those checked above.

## PURPOSE

The Purpose of this Procedure is to define conflict of interest standards for Caregivers.

## PROCEDURE

This Procedure implements [Conflict of Interest - Caregivers](#) Policy No. ADM-0519.

### 1. Disclosure of Significant Financial Conflicts of Interest

1.1. Caregivers who have a personal or [Significant Financial Interest](#) in a company doing business with or interested in doing business with PeaceHealth must disclose that interest and seek management of the Conflict of Interest (Col).

1.2. This disclosure requirement extends to contracts and business arrangements in or from which a Caregiver or a Caregiver's family member or business associate acquires a direct or indirect personal or financial interest or benefit.

2. **Use of Proprietary or Confidential Information.** Proprietary or confidential information of PeaceHealth may not be disclosed to third parties or used for any reason other than in the course of business for the benefit of PeaceHealth.

3. **Business.** Caregivers may not engage in any personal/private business that

3.1. Materially interferes with the Caregiver's assigned duties for PeaceHealth, including, but not limited to, using PeaceHealth time, facilities, or equipment to make or receive phone calls, handle correspondence, or receive visits from personal/private clients or customers.

3.2. Detracts materially from the Caregiver's ability to perform the responsibilities of his or her PeaceHealth position or that could result in loss of business to PeaceHealth.

3.3. Involves any activity in which the Caregiver's own personal/financial interests conflict with or are otherwise adverse to the interests of PeaceHealth.

<i>Procedure Title</i>	<b>Conflict of Interest - Caregivers</b>	<i>Procedure No. Policy No.</i>	<b>ADM-0925 ADM-0519</b>
<i>Department</i>	<b>Organizational Integrity</b>	<i>Effective Date</i>	<b>08-23-16</b>
<i>To Review</i>	<b>System Policy Committee</b>	<i>Page Number</i>	<b>2 of 4</b>

3.4. Involves use of PeaceHealth's identity, address, phone numbers, intellectual property, proprietary, or financial information in the personal/business activity.

4. Personal favors, gifts, or remuneration may only be accepted in compliance with PeaceHealth gift policies.
5. If, in the determination of PeaceHealth, outside employment or business or other activity or interest interferes with work performance or the ability to meet job-related requirements, the Caregiver may be asked to terminate this outside employment or business or other activity or interest to remain employed with PeaceHealth.
6. **Disclosure.** PeaceHealth Caregivers provide a statement, no less frequently than annually, to the Organizational Integrity Department that discloses potential or actual conflicts of interest as described in this policy.
  - 6.1. The Organizational Integrity Department provides the disclosure form in connection with annual education related to conflicts of interest.
  - 6.2. The Vice President for Organizational Integrity implements processes to review and prescribes management for disclosed conflicts of interest.
  - 6.3. The Vice President for Organizational Integrity may include representatives from the Legal Department, Human Resources, PeaceHealth Medical Group, Ethics, and other departments as needed to review all positive disclosures and prescribe a management strategy to reduce or eliminate the conflict of interest.
  - 6.4. The Organizational Integrity Department is responsible for maintaining related documentation.
  - 6.5. A Caregiver who disagrees with the prescribed management strategy may appeal the decision to the Executive Vice President and General Counsel.
  - 6.6. The Organizational Integrity Department promulgates and publishes Col management strategies and guidelines, FAQs, examples of Cols, and other educational materials.

## DEFINITIONS

**Caregiver:** An employee of PeaceHealth.

**Family Member:** A spouse, domestic partner, or dependent child of a Caregiver.

**PeaceHealth Division (PHD):** A medical center, clinic, operating unit, or operating division of PeaceHealth that maintains day-to-day management oversight of a designated portion of PeaceHealth System operations. PHDs may be based on a geographic market or dedication to a service line or business.

**Significant Financial Interest:** The following items are considered significant financial interest:

<i>Procedure Title</i>	<b>Conflict of Interest - Caregivers</b>	<i>Procedure No. Policy No.</i>	<b>ADM-0925 ADM-0519</b>
<i>Department</i>	<b>Organizational Integrity</b>	<i>Effective Date</i>	<b>08-23-16</b>
<i>To Review</i>	<b>System Policy Committee</b>	<i>Page Number</i>	<b>3 of 4</b>

1. Equity interest or entitlement to equity (e.g., stocks, stock options, warrants, or contractual rights to acquire or receive ownership interests other than interests in a diversified mutual fund) of any amount in a non-publicly traded company.
2. Equity interest or entitlement to equity (other than interest in a diversified mutual fund) greater than \$5000.00 U.S., in aggregate over the last twelve months in a publicly-traded company.
3. Compensation (anything of monetary value) including, but not limited to, salary, gifts, consulting fees, honoraria, or other payments for services that is more than \$5000.00 U.S., in aggregate over the last twelve months.
4. An aggregated value of equity interest and compensation that exceeds \$5000.00 over the last twelve months in a publicly-traded company.
5. Royalty income or the right to receive future royalties under a patent, license, or copyright agreement with an entity.
6. Serving in an executive position (any position that includes responsibilities for a material segment of the operation or management of a business, including a position on a board of directors).

## DISSEMINATION

This Procedure will be communicated via the following channels:

1. Announcements in The Caregiver and other communication vehicles through Communications.
2. Posting on the PeaceHealth Policy Hub.
3. Direct notice from the PeaceHealth Policy Hub to appropriate Covered Personnel.
4. Direct communications from the PeaceHealth or PeaceHealth Divisions CNO, CAO, CMO, SVPs, or VPs to their senior management, etc.

## HELP

Further guidance concerning this Policy may be obtained from the Organizational Integrity Department.

## RELATED MATERIAL

### Policy Documents:

- [Confidentiality, Security and Privacy of PeaceHealth Information](#) (PH-SYS)
- [Conflict of Interest – Caregivers Policy](#) (PH-SYS)
- [Conflict of Interest – Persons with Decisional Authority or Agency Roles](#) (PH-SYS)
- [Solicitation and Receipts of Gifts](#) (PH-SYS)

## APPROVALS

**Initial Approval:** The President and CMO approved on July 1, 1995.

<i>Procedure Title</i>	<b>Conflict of Interest - Caregivers</b>	<i>Procedure No. Policy No.</i>	<b>ADM-0925 ADM-0519</b>
<i>Department</i>	<b>Organizational Integrity</b>	<i>Effective Date</i>	<b>08-23-16</b>
<i>To Review</i>	<b>System Policy Committee</b>	<i>Page Number</i>	<b>4 of 4</b>

**Subsequent Review/Revision(s):**

President and CMO approved revisions on February 1, 2010  
President and CMO approved revisions on January 1, 2012.  
President and CMO approved revisions on February 1, 2014.  
VP of Organizational Integrity approved revisions September 24, 2014.  
VP of Organizational Integrity approved revisions July 28, 2016.  
System Policy Committee approved on August 23, 2016.