

CONFLICTS OF INTEREST

Purpose:

To provide a systematic and ongoing method of assisting Boulder Community Health (BCH) employees in disclosing and addressing a potential conflict of interest, and to ensure the integrity of business operations of BCH.

Scope:

Applies to all BCH employees.

Policy Statement:

- Employees of BCH have an obligation to refrain from engaging in any activity, practice or act which conflicts with, or appears to conflict with, the interests of BCH, its patients, or its suppliers. Possible types of activities that might present potential or actual conflicts of interest include:
 - Receiving gifts, gratuities, or entertainment from business sources
 - Relations with vendors, contractors, or competitors
 - Outside employment, outside consulting, and other outside business activity
 - Participation on outside Boards of Directors/Trustees
 - Certain lobbying and political activities
 - Relations with governmental bodies and officials
 - Disclosure of confidential or inside information
- Actions or relationships that have the potential to create a conflict of interest must be disclosed in advance and approved by a supervisor. BCH employees must also promptly report any new actual or potential conflict as soon as the employee becomes aware of it.
- Employees who are director level and above are required to disclose any possible conflicts through a BCH Conflict of Interest Questionnaire on an annual basis.

Procedural Guideline Statements:

1. Employees will disclose in advance and request supervisor approval for any actions or relationships that have the potential to create a conflict of interest.
2. In determining whether a conflict exists, supervisors will consider the nature and magnitude of the opportunity, transaction or arrangement, the degree to which it is related to BCH's business, whether the individual is the ultimate decision maker or holds significant influence, the existence of other viable alternatives, and what is customary and reasonable in the healthcare industry. The supervisor will consult with the BCH's Compliance Department as needed.
3. On an annual basis, employees who are director level and above will be sent a request to complete the BCH Conflict of Interest Questionnaire.
4. All responses will be compiled by the Compliance Department and reviewed for potential conflicts.

5. The Compliance Department will investigate and consider circumstances surrounding reported potential or actual conflicts of interest, including further interviewing the employee and any other action necessary or appropriate to make an informed decision.
6. The Compliance Department will notify the employee's immediate supervisor of specific conflicts to ensure awareness and future monitoring.

Definitions:

1. **Conflict of Interest:** Broadly speaking, a conflict of interest exists whenever an employee's independence of judgment concerning the best interests of the organization or duties as an employee may be restricted because of the employee's (a) affiliation with; (b) financial interest in; and/or (c) obligation to another individual, business entity, industry association, charitable organization or other activity. Conflicts of interest tend to arise under circumstances in which actions of an employee could create an adverse effect on the interests of the hospital or personal gain or advantage to the employee or a third party or inhibit the employee from acting in the best interest of the hospital or its patient's. A conflict of interest may exist and is reportable if it relates to an employee or a member of the employee's immediate family.

Resources:

Corporate Compliance and Risk Officer
General Counsel

References:

BCH Conflict of Interest Questionnaire
BCH Gifts, Sponsorships, Gratuities, and Business Policy

Key Words:

Conflict, conflicts, conflict of interest, outside employment, personal business interests

Content Reviewers:

Corporate Compliance and Risk Officer
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