

Title: Conflict of Interest	Policy Number: A-COM-0012 Policy Type: Administrative Effective Date: December 17, 2009
Replaces (supersedes): Title:	Policy Chronicle: Date Original Version of Policy was Effective: 12-17-09 Reviewer Signature: _____ Date: _____ Print Name: _____ Title: _____
Area of Operations: Compliance	
Regulatory Agency: Joint Commission	Approvals: (Refer to policy for required signatures) Chief Compliance Officer J. Glover Taylor _____ General Counsel Paul Allison _____ Senior VP of Patient Care Services/CNO Tom Smith _____ Chief Operating Officer: Allison Bayer _____ Chief Executive Officer Dennis Keefe _____
Keywords(s)	Conflict of interest; Disclosure

I. Purpose: Cambridge Health Alliance is committed to conducting its affairs in accordance with the highest ethical and legal standards. CHA recognizes that individuals associated with CHA have diverse financial and professional interests. However, it is important that these outside interests do not create inappropriate conflicts that could adversely affect the interests of CHA, the quality of patient care, treatment or services. This policy provides for the disclosure and, if necessary, resolution of potential conflicts of interest.

II. Personnel: CHA Officers, Senior leadership, Chiefs of Service, Division Chiefs, Senior Directors, Directors, Managers, and Staff.

III. Definitions:

Conflict of Interest: A conflict of interest may exist whenever an individual covered by this policy, or a member of his or her family (including a spouse or domestic partner and relatives to the second degree of consanguinity and any trust or other entity for the benefit of the foregoing),

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directly or indirectly, has a Financial Interest or a Personal Interest in an outside entity that may reasonably be perceived as influencing the individual's judgments or actions in their role at CHA.

Financial Interest: Remuneration including compensation, fees, and consulting income. Equity or ownership interests, except any interest arising solely by reason of investment in a mutual, pension, or other institutional investment fund over which the individual does not exercise control.

Personal Interest: A position with responsibilities as a Trustee, Board Director, or Executive.

IV. Policy: Individuals covered by this policy must disclose any existing or anticipated outside financial or personal interests that may result in a potential conflict of interest. CHA will review all disclosures and determine if further action is required. If a disclosure indicates a conflict of interest that could potentially adversely affect the interests of CHA, the quality of patient care, treatment or services, CHA will require implementation of protections or actions to resolve the potential conflict.

CHA has established specific policies and procedures to address conflicts of interest in research activities (See Conflict of Interest in Research, A-COM-0009) and for the Professional Staff of Cambridge Health Alliance Physician Organization (See CHAPO Conflict of Interest, A-CPO-0007). Network Health has established a policy and procedures for disclosures of conflicts of interest by Network Health employees. Activities addressed under those policies and procedures are excluded from the requirements of this policy for submission of disclosure statements contained in section V, Procedures, paragraphs A.1 and B.

Additionally, CHA has established specific requirements regarding conflicts of interest that may arise from relations with pharmaceutical and medical device companies (See Pharmaceutical/Medical Device Industry Relations A-PHA-0001). That policy provides additional requirements that supplement the requirements of this policy.

Finally, CHA may from time to time establish additional policies for specific persons, committees, or activities that establish additional requirements to address potential conflicts of interests in specific circumstances.

V. Procedures:

A. Disclosure at the time a potential conflict of interest arises.

1. An individual must disclose the existence of any actual or potential financial interest or personal interest that may create a potential conflict of interest at the time the actual or possible financial or personal interest arises or the individual first becomes aware of such financial or personal interest. The disclosure should be made using a Disclosure Statement, as described in paragraph V.C., below.

2. Any time an individual is involved in a deliberative or decision-making process or in a transaction that is being contemplated or executed by CHA, the individual must disclose the existence of any actual or potential financial interest or personal interest as soon as possible, or at the time the individual first becomes aware of such financial or personal interest. This disclosure should be made to directly to the person who is the final decision-maker with regard to

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the transaction, or if the individual is the final decision-maker, then the disclosure should be made to the individual's supervisor.

B. Periodic Disclosures

1. CHA will periodically request Disclosure Statements from all individuals at the Assistant Director level and above, and other key personnel in the Materials Management, Purchasing and Information Technology departments who are involved with purchasing decisions documenting potential conflicts of interest covered by this policy. Disclosure statements will be requested on a standard form.

2. An individual must disclose all existing or anticipated outside financial or personal interests that may create a potential conflict of interest as described in this policy when requested by CHA.

C. Submission and Review of Disclosure Statements.

1. Disclosure Statements will be submitted to the Corporate Compliance Office. The Corporate Compliance Office will treat the submissions as confidential information to be used and disclosed only for the purposes set forth in this policy or for other legal obligations of CHA.

2. Disclosure Statements will be reviewed by the Chief Compliance Officer and Legal Counsel. If the reviewer determines if any disclosure represents a potentially problematic conflict of interest, the reviewer will discuss the matter with the individual and the appropriate senior leader to attempt to resolve the matter.

3. If the matter cannot be satisfactorily resolved, the matter will be referred to the Conflicts Committee. The Conflicts Committee shall have the authority to approve the relationship or activity as is, approve it with conditions, or disapprove the relationship.

4. The Conflicts Committee will notify the individual and appropriate supervisory official of its determination.

D. Conflicts Committee.

1. The CEO shall appoint a Chair and members to the Conflicts Committee.

2. The Committee shall:

a. Review any potential conflicts referred to them by the Chief Compliance Officer or General Counsel, and determine the appropriate action with regard to those conflicts.

b. Evaluate the effectiveness of the Conflict of Interest policy and recommend changes to the CEO.

c. Report annually to the CHA Board of Trustees on the effectiveness of the policy.