


Kennebec Region Health Alliance [KRHA]

Conflict of Interest Policy

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AUTHORIZATION:


Barbara Crowley MD, President KRHA


John Burke MD, Board Chair KRHA

Denise Gay, Chief Compliance Officer

- I. **PURPOSE:** As a taxable nonprofit organization KRHA should address conflicts of interest involving its Officers, Directors, and Contracted Staff to ensure that no person derives any inappropriate personal profit or gain, directly or indirectly, because of participation with KRHA. This conflict of interest policy is designed to help Officers, Directors, and Contracted Staff of KRHA to identify and appropriately resolve situations that present actual and potential conflicts of interest. This policy is intended to supplement but not replace any applicable state laws governing conflict of interest applicable to nonprofit and charitable organizations.
- II. **POLICY:** The Conflict of Interest Policy requires disclosure of any actual or potential conflict of interest to an individual Board Member or Board Chair as applicable. Certain members of the KRHA community are also required to complete a Conflict of Interest Disclosure Statement in connection with the Conflict of Interest Policy. All Officers, Directors, and Contracted Staff will not, in violation of this policy derive any inappropriate personal profit or gain, directly or indirectly, because of participation with KRHA. Violation of these policies may be grounds for disciplinary action up to and including termination from employment, loss of privileges or Board action as applicable.
- III. **RESPONSIBILITY:** Officers, Directors, Medical Directors, and Contracted Staff of KRHA must report in good faith, actual or potential conflicts of interest and avoid not only actual conflicts but any appearance of a conflict off interest as well.
 - Board of Directors

It is understood that Officers and Directors of a corporation hold an influential and distinct position within KRHA and accordingly are subject to specific guidelines for avoiding conflicts of interest at the Board level.
 - KRHA Employees

As a condition of employment, all contracted Staff are required to observe policies designed to prevent conflicts of interest.

- IV. **REPORTING:** KRHA Officers, Directors, and Contracted Staff are under a continuing obligation to disclose any actual or potential conflict of interest as soon as it is known or reasonably should be known. They must complete a Conflict of Interest Disclosure Statement (attached).
- A. *Determining Whether a Conflict of Interest Exists.* After disclosure of the actual or potential Conflict of Interest, all material facts will be reviewed to identify those needing further action.
 - B. *Procedure for Addressing the Conflict of Interest.* If a potential or actual Conflict of Interest is identified, the Compliance Officer, will issue a plan to minimize or prevent the Conflict of Interest.
 - C. *Failure to Disclose a Conflict of Interest.* If KRHA has reasonable cause to believe a member has intentionally failed to disclose an actual or potential Conflict of Interest, appropriate disciplinary or corrective action, shall be taken.
 - D. *Confidentiality.* Each member shall exercise care not to disclose confidential information acquired in connection with their status with KRHA or information that disclosure of which might be adverse to the interests of KRHA. Furthermore, a member or employee shall not disclose or use information relating to the business of KRHA for personal profit or advantage.
- V. **RECORDS OF PROCEEDINGS:** The Compliance Officer will annually report all validated Conflicts of Interest to the Board.
- Annual review:* To ensure that KRHA MGH operates in a manner consistent with its purposes and does not engage in activities that could jeopardize its taxable nonprofit status or its reputation, an annual review shall be conducted by the Chief Compliance Officer to determine whether any identified Conflict of Interest was dealt with according to these policies and procedure. The Chief Compliance Office will annually report its findings to the KRHA Board of Directors.
- VI. Original signed KRHA Policies are maintained in the KRHA administrative office and available to members on the ShareFile website.
- VII. **POLICY APPLIES TO:** All Members and Contracted Staff of KRHA.

**Kennebec Region Health Alliance
Conflict of Interest Disclosure Form**

Note: A potential or actual conflict of interest exists when commitments and obligations are likely to be compromised by the Party's other material interests, or relationships (especially economic), particularly if those interests or commitments are not disclosed.

This Conflict of Interest Form should indicate whether the disclosing party has an economic interest in, or acts as an officer or a director of, any outside entity whose financial interests would reasonably appear to be in conflict with those of KRHA. The disclosing party should also disclose any personal, business, or volunteer affiliations that may give rise to a real or apparent conflict of interest.

Date:

Name:

Position:

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest:

_____ I have no conflict of interest to report.

_____ I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Signature: _____

Date: _____