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## **Title: CONFLICT OF INTEREST DECLARATION AND DISCLOSURE PROTOCOL**

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### **Scope:**

This policy applies to all employees of Trauma Trust.

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### **Policy Statement:**

To establish the Trauma Trust (TT) policy and procedure for identifying, evaluating and correcting real, apparent and potential conflicts of interest and to establish procedures for annual disclosure and resolution of such conflicts.

Trauma Trust employees all serve the public purposes to which TT is dedicated. Accordingly, all such individual have a clear obligation to conduct the affairs of TT in a manner consistent with those purposes and to make all business decisions solely on the basis of a desire to promote the mission and vision of TT.

This policy recognizes and affirms the expectation that individuals will conduct their relationship with each other, TT and outside entities with objectivity, honesty and integrity.

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### **Procedure:**

#### **I. Documentation:**

- A. Employees of TT should, prior to assuming their position and annually, complete a "Declaration of Compliance with the Conflict of Interest Standard" form to acknowledge, in writing, their knowledge of this standard and either affirms that they have no interest, direct or indirect, in conflict with TT interest, or identify any interests that have potential or actual conflict.
  - 1. Also, it is the responsibility of the individual to immediately disclose any changes to the annual written Declaration by completing and submitting a revised Declaration of Compliance and Disclosure Form.

#### **II. Process:**

- A. The distribution of the Declaration and Disclosure will be on an annual basis.
  - B. Electronic notifications and reminders are sent at pre-determined intervals until all disclosures are returned to the Office Coordinator. Review and Reportable Conditions – Trauma Trust shall obtain annual written Declaration of Compliance and Disclosure Forms regarding external commitments and interests from all TT employees.
    - 1. Where a potential or real conflict exists, the TT Medical Director
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and/or Operations Manager shall inform the FHS or MHS Chief Compliance Officer regarding such matters, as necessary.

### **III. Conflict Remedies and Sanctions for Standard Violations:**

- A. Where significant conflicts of interest are found to exist, the TT Medical Director and/or Operations Manager shall take appropriate actions to work with the individual and seek the advice of Human Resources and Legal Counsel, as necessary, to evaluate the conflict situations and act to manage or eliminate them.
- B. When a conflict is identified and a decision is made to allow the activity or relationship to continue, appropriate monitoring procedures or restrictions to minimize and control the conflict will be determined.
- C. Remedies may include broader disclosure of significant conflicts, removing purchasing or other related decision authority, establishment of monitoring procedures, divesting financial interests, or severing relationships that constitute actual or potential conflicts.
- D. Upon the advice and recommendations of the Trauma Medical Director, the Board of Directors has final responsibility and authority in all matters concerning conflicts of interest.
- E. Sanctions are warranted for failure to report potential conflicts or to abide by determined remedies and may include, but are not limited to:
  - 1. Oral or written reprimand
  - 2. Transfer or reassignment
  - 3. Probation
  - 4. Suspension without pay
  - 5. Demotion
  - 6. Termination
- F. Severity of sanctions depends on the extent of the violations of this standard.
  - 1. Inadvertent, unintentional, and minor breaches require lesser sanctions, whereas knowing, deliberate, and major violation will carry more severe sanctions.
  - 2. Gross non-compliance with this standard could constitute due cause for dismissal.
  - 3. Any sanctions for violations of this standard will be carefully examined with due regard for the rights of the individual and the interests of TT.

### **IV. Definitions:**

#### **Conflict of Interest Principles:**

- 1. Generally, a conflict of interest occurs if an outside interest or activity may influence or appear to influence the ability of an individual to exercise objectivity or meet his or her employment or contractual responsibilities to TT. An individual is considered to have a conflict of interest when:
  - a. He or she or any of his or her family or associates may receive a financial or other significant benefit as a result of his or her position at TT.

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- b. Has the opportunity to influence TT business, administrative or other decisions in ways that could lead to personal gain or advantage; or
  - c. Has an existing or potential financial or other significant interest, which impairs or might appear to impair the individual's independence in the discharge of responsibilities to TT.

**Conflict of Avoidance and Disclosure:** TT employees have the obligation to avoid ethical, legal, financial, or other conflicts of interest, to ensure that their activities and interests do not conflict with their obligations to TT or its welfare, and to respond appropriately to disclose and resolve conflicts of interest when they arise.

**Family:** The family of an individual includes his or her spouse, domestic partner, parents (step and grand), siblings (step), children (step and grand), in-laws, aunts, uncles, nieces, nephews, any other relative who resides in the same household or persons with a common domicile.

**Associate:** An associate of an individual includes any person, trust, organization or enterprise to which the individual or any member of his or her family is a director, officer, employee, member, agent, partner or trustee, or has a significant financial interest or any other interest which enables him or her to exercise control or significantly influence policy.

**Business or Other Entity:** A business or other entity means any corporation, partnership, sole proprietorship, franchise, association, organization, holding company, joint stock company, receivership, real estate trust, or any other legal entity organized for profit or not-for-profit purposes, but excluding Trauma Trust or CHI-Franciscan and MultiCare Health Systems.

**Financial Interest:** A financial interest is an interest in a business consisting of:

1. Current or pending ownership interest, including proprietary or partnership interest or any stock, stock option or similar ownership interest; or
2. Receipt of, or the right or expectation to receive, any income from such business, whether in the form of a fee, salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty, rent, capital gain, real or personal property, or any other form of compensation.

**Other Interest or Relationship:** Other interest or relationship in a business or other entity can include, but is not limited to, affiliation or association through participation as a director, officer, employee, member, agent, partner or trustee.

**Significant and Substantial:** Significant and substantial should be evaluated as relative terms. Items or interest are considered to be significant or substantial if they allow the individual to exercise controlling or decision-

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making authority, if relative to the individual's other financial interest they appear material for that individual, or if an average, reasonable, independent observer might consider them to be. If there is a question as to the significance or substantial nature of an item or interest, professional integrity warrants that it be disclosed for independent review.

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**Related Policies: "Gifts, Gratuities and Business Courtesies"**

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**Approval By:**

**Date of Approval: 9/16**

Trauma Trust Leadership

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Revision Dates:

X/XX; X/XX

Reviewed with no Changes Dates:

X/XX; X/XX

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