

**ANNA JAQUES HOSPITAL
ADMINISTRATIVE POLICY & PROCEDURE MANUAL**

Subject: Conflict of Interest	Policy Number: C-11.2
Category: Compliance	Effective Date: 8/83
Page: 1 of 1	Revised Dates: 3/99, 12/01, 2/02, 2/10
Attachments:	Review Dates: 11/04; 12/07
References: MGL Ch. 268A	

POLICY

STATEMENT: It is the policy of Anna Jaques Hospital that all employees, contractors and practitioners granted privileges through the medical staff shall act in good faith to fulfill their responsibilities and to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy is established to ensure that patient care and business activities are conducted in an objective manner and are not motivated by desire for personal or financial gain.

RESPONSIBILITY: This policy applies to all employees, including senior managers, department directors and supervisors; physicians and practitioners granted privileges through the medical staff; as well as those providing contracted services to the hospital.

PROCESS:

1. All employees, contractors and practitioners granted privileges through the medical staff are required to disclose any actual or potential conflict of interest and seek guidance on how to handle the situation.
Conflict of Interest is defined as: Any situation in which financial or other personal considerations may compromise or appear to compromise (1) an individual's business judgement; (2) delivery of patient care; or (3) ability for the individual to do his or her job. An actual or potential conflict of interest occurs when an individual is in a position to influence a decision that may result in a personal gain for themselves or for a relative as a result of business dealings. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship is similar to that of persons who are related by blood or marriage.
2. Business dealings with outside entities should not result in *unusual gain* for those entities, this organization or any individual covered by this policy. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks and/or other windfalls. Certain nominal benefits are allowed in accordance with other policies.
3. The materials, products, designs, plans, ideas, and data are the property of the organization and should never be given to an outside firm or individual except through normal channels with appropriate prior authorization. Any improper transfer of material or disclosure of information, even though it is not apparent that there may be any personal gain by such action, is prohibited.
4. Actual or potential conflicts of interest must be disclosed to appropriate management personnel, human resources, medical staff office or the Compliance Officer.
5. Employees, contractors and practitioners granted privileges through the medical staff must seek guidance and approval from appropriate management personnel prior to pursuing any business or personal activity that may constitute a conflict of interest.

Authorizing Signatures	Name / Title	Date
Administration:	Delia O'Connor President & CEO	