



# PEACEHEALTH CONFLICT OF INTEREST PROGRAM

## FAQs

### What is a “Conflict of Interest (COI)”?

A Conflict of Interest exists when a caregiver’s personal interests or obligations interfere (or appear to interfere) with the caregiver’s obligations to act solely in the best interest of PeaceHealth and our patients. Personal interests can (or appear to) cloud a person’s judgement and place the individual and our organization at risk.

Anything that can affect (or appear to affect) one’s ability to make decisions objectively and without bias can lead to a COI.

### Why does PeaceHealth have a COI Program?

There are several reasons why PeaceHealth created and maintains a COI Program:

- Charitable organizations are required to have a COI program to ensure members of PeaceHealth are acting in the best interest of the organization
- To help PeaceHealth to ensure compliance with regulatory requirements. Disclosing conflicts of interests helps to protect PH against improper arrangements.
- Members of the enforcement community are focusing on conflicts of interest. The COI program protects our caregivers and our organization.
- The COI Program is an integral component of PeaceHealth’s effective compliance program.

### To whom does the COI Program apply?

The COI Program applies to all PeaceHealth caregivers. Those in certain roles are required to report annually, but ALL caregivers have a duty to disclose anything that might be or appear to be a COI.

### What is the COI Survey Form and is it different from the Disclosure Form?

The COI Survey is a question and answer form used to identify activities that could lead to a conflict of interest or present a risk to our organization. The COI Survey Form and Disclosure form are the same thing. You may here the terms used interchangeably.



## Who must complete the COI survey?

Those in certain roles are required to complete the COI survey annually. This includes PeaceHealth leaders, board and committee members, medical directors, employed providers, and others who may be designated by leadership.

Additionally, caregivers who are not in the roles listed above but may have a potential conflict of interest are advised to complete a COI survey before entering into any business or other relationship that might reasonably influence or appear to influence their responsibilities as a caregiver with PeaceHealth.

If there are questions or concerns, please reach out to Organizational Integrity at any time.

## The COI Survey questions seem to touch on my personal or private dealings. Why do you need this information?

The intent behind the survey is to protect PeaceHealth and our caregivers from risks associated with potential conflicts of interest. The questions are designed to solicit full and meaningful responses to ensure we can address and manage conflicts effectively.

## How often do I have to complete the COI survey?

At a minimum, surveys must be completed annually by PeaceHealth leaders, board and committee members, medical directors, employed providers, and others designated by leadership. Additionally, ALL caregivers should report new potential conflicts as they arise.

## What will happen if I have a Conflict of Interest?

Once an actual or potential conflict of interest has been identified, the conflict will need to be managed. OI will evaluate each scenario and respond accordingly. Generally, conflicts of interest can be managed through a straightforward management plan. In some circumstances, you may be required to recuse yourself from meetings or discussions about circumstances involving the conflict, or the conflict may need to be eliminated. OI will communicate any action required directly to the individual and leadership.

## What is a Management Plan?

A management plan is a document that outlines specific guidelines to which a caregiver must adhere in order to manage a conflict and mitigate the risk. The management plan documents the conflict of interest, any information reviewed, discussions with individuals, guidelines and expectations. The final management plan will be communicated to the caregiver and the caregiver's leader.



## What should I do if I'm not sure whether my situation poses a conflict, or I have questions about PeaceHealth's Conflict of Interest Program?

Reach out to your leadership or Organizational Integrity directly. OI is here as a resource to help navigate these situations. OI can be contacted through the following:

- Crossroads: Crossroads/system departments/Organizational-integrity/Conflict of interest disclosure form
- RS:SSC-OI COI Questions inbox: [OI-COIQuestions@peacehealth.org](mailto:OI-COIQuestions@peacehealth.org) or 360-729-1730