 Policy & Procedure	Conflict of Interest		
	Department Administration	Document Number	Page 1 of 2
Prepared By or Currently Managed By: Marie Wiesmann, Director of Quality & Risk Management Call (920) 568-5278 with questions			
Committee/Administrative Approval (if required) Administration & Medical Staff			Approval Date

PURPOSE

This policy establishes guidelines for interactions between Industry and providers and staff at Fort HealthCare. We encourage interactions and partnerships with industry which serve the public good and promote our mission. These interactions must be appropriately conducted and monitored in order to avoid or manage conflicts of interest that can adversely affect our patients or the organization.

SCOPE

This policy addresses a specific set of interactions with Industry, and purposefully excludes others. In particular, it does not address activities certified for CME credit by an ACCME-accredited organization.

This Policy addresses the following areas:

- I. Gifts to Individuals employed at Fort HealthCare
- III. Attendance at Non-CME certified events / outside activities funded by Industry
- IV. Speaking at Non-CME certified events Sponsored by Industry

DEFINITIONS

Interactions with Industry should be conducted so as to avoid conflicts of interest when possible, and to minimize and effectively manage these when conflicts do exist.

POLICY

Professionalism is an element within the core values at Fort HealthCare and forms the basis for the provision of care. Because health care providers occupy esteemed and privileged positions in our community, we must maintain a strong relationship of confidence and trust between clinicians and their patients. Promoting the values and behaviors associated with professionalism for both current and future generations of healthcare providers is a primary responsibility of any health care organization. All health care providers must ensure that the process by which they make clinical decisions is transparent, ethical, free of undue economic influence, and reflects the highest professional standards. Patients deserve and expect well-informed, objective health care decision-making based on their best interests.


GIFTS TO INDIVIDUALS

Clinicians may not accept from Industry anything of value for their private benefit or the benefit of their immediate family or an organization with which they are associated, for which payment for services are not provided in return.

This includes, but is not limited to money, property, favor, service, food, travel, and entertainment. For the purposes of this Policy, there is no minimum value to a gift; items of little value such as pens, sticky notes, magnets, key chains, and laser pointers, are all considered gifts.

Attendance at non-CME Events / Outside Activities Funded by Industry

Clinicians may attend industry-sponsored events, such as educational programs that are not certified for MCE credit, at their own discretion. The Clinicians shall not receive any remuneration or gifts in exchange for attendance. This does include the cost of meals and reimbursement for any expenses to attend the program.

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PROCEDURE

An individual conflict of interest occurs when a person with entrusted responsibility has another interest that may conflict with the proper exercise of that responsibility.

REFERENCES:

Definitions:

- A. **Industry or Industry Representatives:** Manufacturers, services, and other vendors of pharmaceutical, medical device, medical supply, and medical testing companies, and their employees, representatives, agents, and vendors.

- B. **Non-CME Events:** Events, including those held in other countries, which are not certified for continuing medical education credit by an ACCME-accredited organization.

Original Date		
Reviewed/Revised (choose one)	Name	Date