

CHAPTER Administrative	CHAPTER 01	SECTION 001	SUBJECT 55
SECTION Governance/Leadership		DESCRIPTION Conflict of Interest	
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APPLICATION:

<input checked="" type="checkbox"/> CMH Staff	<input checked="" type="checkbox"/> Board Members	<input type="checkbox"/> Provider Network	<input checked="" type="checkbox"/> Employment Services Providers
<input type="checkbox"/> Employment Services Provider Agencies	<input checked="" type="checkbox"/> Independent Contractors	<input type="checkbox"/> Students	<input type="checkbox"/> Interns
<input type="checkbox"/> Volunteers	<input type="checkbox"/> Persons Served		

POLICY:

The Lapeer County Community Mental Health (LCCMH) Board, staff, and providers avoid any conflict between their own respective personal, professional, and/or business interests and the interests of Lapeer County, LCCMH, and Region 10 Prepaid Inpatient Health Plan (PIHP), in all actions taken by them on behalf of the County and/or LCCMH in their respective capacities.

STANDARDS:

- A. LCCMH follows the Lapeer County Conflict of Interest Policy and the Region 10 PIHP Conflict of Interest Policy #01.02.03.
- B. Gifts of entertainment from vendors are limited to common business courtesies which may include an occasional lunch, dinner, or gift of limited value.
 - 1. Monetary gifts/favors in an attempt to gain an unfair financial and/or personal advantage are strictly prohibited.
 - 2. Business courtesies that would influence or appear to influence an employee in the conduct of their duties must be declined.

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PROCEUDRES:

- A. In the event a LCCMH Board Member, staff, or committee member has direct or indirect financial interest in, or relationship with, any individual or organization which proposes to enter into any transaction with LCCMH or the County, including, but not limited to, transactions involving:
1. Sale, purchase, lease or rental of any property or other asset
 2. Employment or rendition of services, personal or otherwise
 3. Award of any grant, contract, or subcontract
 4. Investment or deposit of any LCCMH or County funds
- B. An individual with an interest or relationship as described above gives notice of the conflict of interest to the Chief Executive Officer (CEO) for review and action by the LCCMH Board, as well as notice to the County Administrator and Chief Financial Officer for presentation to the County Board of Commissioners, prior to final approval, in a public meeting where any potential conflict of interest is openly disclosed.
- C. An agency Conflict of Interest Disclosure/Attestation is completed by LCCMH annually and includes a full board member listing as required by the Region 10 contract.
- D. LCCMH ensures publicly funded research is free from bias, in accordance with LCCMH Financial Conflict of Interest in Public Health Services Funded Research 01.002.95.
- E. For staff seeking supplemental employment with an agency that could be a potential conflict of interest, refer to LCCMH Supplemental Employment Policy 05.001.105.

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DEFINITIONS:

Conflict of Interest: Any situation in which financial or other personal considerations may compromise or appear to compromise (1) an employee’s business judgment; (2) delivery of care to the person served; or (3) ability for an employee to do his or her job. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or 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 with the employee is similar to that of persons who are related by blood or marriage.

Unusual Gain: Business dealings with outside entities that result in an unfair advantage for those entities, the organization, or an employee or provider. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee or both. Certain nominal benefits are allowed in accordance with other policies.

REFERENCES:

- Lapeer County Policy: Conflict of Interest
- Region 10 Policy: Conflict of Interest #01.02.03
- LCCMH Policy #01.002.95 Financial Conflict of Interest in Public Health Services Funded Research
- LCCMH Policy #05.001.105 Supplemental Employment Policy

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This policy supersedes
#01/08001 dated 01/08/2008.
