



CONFLICTS OF INTEREST Frequently Asked Questions

What is a Conflict of Interest?

A conflict of interest can exist when a person (or his or her immediate family, business partner, employer, or institution) has a relevant direct or indirect interest or relationship that is or may be inconsistent with, conflicts with, or prevents the person from carrying out or otherwise fulfilling the responsibilities, duties, loyalty, or exercise of independent judgment, in a matter involving PSJH. These relationships are often, but not always, financial.

Example: An employee has a consulting business where he or she provides services to an entity that competes with PSJH.

Example: A PSJH board member has an investment interest in an organization to which PSJH physicians refer patients.

Why does PSJH have a Conflicts of Interest policy?

The [Conflicts of Interest policy](#) promotes fiduciary responsibility and stewardship by protecting those who exercise substantial influence over PSJH from actual or apparent conflicts of interest that may be contrary to PSJH's interests.

PSJH's Conflicts of Interest policy outlines the steps that are taken to manage actual or apparent conflicts. This policy supports our tax-exempt status by assuring we act in a manner consistent with our charitable purpose.

Where can I find this policy?

You can find copies of the [Conflicts of Interest policy](#) online, or when you log in to your account at <https://providence.coi-smart.com/login.php>.

Who does the Conflicts of Interest policy affect?

The policy covers "affected persons" and "interested persons." If you qualify as an affected or interested person, the conflict of interest disclosure requirement applies to you.



Who is an *affected person*?

“Affected person” refers to any employed or contracted: executive; health care administrator; department head (generally director or above); school administrator; medical director and other physician in a leadership position within PSJH; purchasing agents/buyer; those on committees that recommend or approve formularies or the purchase of medical devices, supplies, and equipment; those who recommend or approve investments by PSJH; and a consultant acting on behalf of PSJH in any of the aforementioned positions.

Who is an *interested person*?

“Interested person” refers to any PSJH Board member or member of a local ministry board, community board, advisory board, foundation board, committee with board-delegated powers, or similarly situated governing body (collectively referred to as the Board). If a person is an interested person with respect to any entity of which PSJH is a part, he or she is an interested person with respect to all entities in PSJH.

What can I expect when I receive my Conflicts of Interest disclosure notice?

You will be asked to affirm your agreement with PSJH’s Confidentiality policy and Conflicts of Interest policy, and to affirm your intent to abide by specific conflict of interest standards.

You will also be asked to provide more detailed information if you have financial interests in a business that competes with PSJH, if you have accepted gifts, or if you are involved in outside or other activities that might create a conflict of interest.

The affected and interested person definitions do not apply to me. Do I still need to declare my conflicts?

As PSJH [workforce members](#), we must avoid activities and relationships that may impair our independent judgment and unbiased decision-making. Other workforce members are required to disclose — to their immediate supervisors, to their regional compliance manager or system integrity — any real or potential conflicts of interest prior to making any decision or taking any action that is or may be affected by the conflict. The interest must also be disclosed in writing by submitting an online conflict of interest form.

Why is conflicts of interest disclosure required for workforce members not employed by PSJH?

PSJH requires certain individuals not employed by PSJH to complete a conflict of interest disclosure because of PSJH’s obligation to conduct activities in a professional and ethical manner that is transparent and free of inappropriate influence and that meets legal and regulatory requirements, including those imposed by the IRS



and Joint Commission. It is important to ensure that those in positions of authority in our organization do not receive inappropriate or excess benefits that could jeopardize our tax-exempt status.

Do I have to complete the form if I have no activities to disclose or if my interests are less than amounts specified in “significant financial interest”?

Yes. All covered individuals (see above) must complete and sign the annual disclosure form. If you have no activities to disclose, or your interests are less than the amounts as defined in “significant financial interest,” you should respond accordingly to the questions.

When will I be asked to complete my disclosure?

The disclosure form is to be completed within the first month of service using a System Integrity Web-based form on a secure HTTPS site. You will be asked to complete your disclosure annually.

How will I complete my disclosure?

You will be provided with a Web link to a secure [Conflicts of Interest management site](#). Click on the link and enter your login information (provided to you in an automatically generated email).

Will my information be secure?

Yes. Access to the Web-based form will be through a secure HTTPS site using 128-bit Secure Sockets Layer encryption. This gives you the highest level of protection for an Internet communication and is the encryption used for credit cards and financial transactions.

What if I lose my password?

Use the link <https://providence.coi-smart.com/login.php> to go to the Conflicts of Interest site, click on “Forgot Password?” and enter your primary email address. Your password will be sent to your primary email.

Who will see my disclosure form?

Access to disclosure forms is on a need-to-know only basis. System Integrity administers the conflict of interest disclosure process for PSJH. System Integrity accounts for completed forms and reviews forms for potential conflicts of interest. If more information or further action is required, you will be contacted by System Integrity staff, a Regional Compliance and Privacy Manager, or an appropriate PSJH leader.

What happens after I have submitted my Conflicts of Interest disclosure form?



The System Integrity and Compliance Office staff will complete an initial review of your disclosure and may call or email you to clarify your answers. Access to your information will be restricted to those with a need to know.

What if my financial interests change after I file my disclosure?

You can update or revise your Conflicts of Interest disclosure [online](#) by using your Login ID and password.

What happens if I have a conflict of interest?

If after reviewing all the facts it is determined that you have a conflict of interest, a plan will be developed to resolve or remove the conflict.

Conflicts of interest must be handled carefully to ensure good, effective decisions, to preserve the reputation of PSJH and its leaders and managers, and to protect against liability.

How can I get more information if I still have questions?

You can find additional information by visiting [Conflict of Interest website](#) or contact your [regional compliance manager](#).