

Children's of Alabama Compliance Corner

Got Conflicts of Interest (COI)?

A **conflict of interest** occurs when an employee (or their family member) is in a position to gain personal benefit from actions or business decisions made in their professional capacity, or if outside employment may interfere or coincide with their position at COA. This is a quick reference for managing the most commonly occurring COIs at work. This table can be found on the Compliance and Internal Audit website (link in left margin of The Red Wagon).

Identifying and Managing Conflicts of Interest	Possible examples - this list is not all-inclusive*	
<u>Identify Situation with Possible Conflict</u>	<u>How to Manage the Situation</u>	<u>Comments / Notes / Examples</u>
1. Gifts/Products/Services from Vendor/Patient/Family		
a) Cash or Cash Equivalent (Gift card)	We cannot accept cash or a gift card.	Suggest that a donation be made on http://www.childrensal.org in honor of employee. Click "Ways to Help" tab, then "Donate Now".
b) Food/snack items	May be accepted if: <ul style="list-style-type: none"> • shared with department or floor, • minimal value • infrequent, and • unsolicited 	Examples: cakes, cookies, candy, fruit shared with your department are acceptable
c) Food/meals	May be accepted if: <ul style="list-style-type: none"> • the value is minimal, • there is a legitimate business purpose, • infrequent and • unsolicited 	Examples: <ul style="list-style-type: none"> • major installations or upgrades on campus • vendor conducted product training/education for <u>previously purchased products</u> • off campus business meetings Note: for product education/training noted above, meals <u>must</u> be: <ul style="list-style-type: none"> • on campus • no "grab & go" <ul style="list-style-type: none"> ○ attendees must be taking part in the education session not just dropping by to grab a free meal.

d) Gifts/trinkets	May be accepted if: <ul style="list-style-type: none"> • minimal, • infrequent, and • unsolicited * No gift cards or cash	Example 1: home-made mementos, pens, pads, paper weights, tokens which commemorate an event or relationship are acceptable Example 2: vendor-provided tickets/access to entertainment or sporting events, use of a vacation facility, home improvements, loans, etc., are NOT acceptable
e) Vendor payment of registration, travel, meals, lodging for continuing educational events	May not be accepted	Exception: vendor-paid travel and lodging included <u>in a contract</u> for items such as product training are acceptable
f) Drug samples / supplies	see Sample Medication policy; supplies must be vetted by management before giving to patients	
2. Gifts to Vendor/Patient/Family	<ul style="list-style-type: none"> • Business expenses should follow Children's policies and IRS tax laws. • Patients/Family – No gifts should be given 	Note: Cards and notes to patients/families/care givers as expressions of caring are appropriate to give, as long as the Professional Boundaries policy is respected (do not give personal contact information to patients).
3. Participation in a vendor "user's group" or advisory board	Participation allowed: <ul style="list-style-type: none"> • obtain prior approval of supervisor, • No vendor support allowed (no travel, food, or lodging) • Any honorarium would revert to Children's • If there is a registration fee, this can be paid by the vendor. 	Note 1: use of Children's name cannot appear to indicate that Children's is sponsoring the activity Note 2: employees should never appear to represent or speak on behalf of Children's without receiving approval from Corporate Communications.
4. Outside Business Opportunities	<ul style="list-style-type: none"> • Promoting or operating personal enterprises such as catalog sales, cleaning or rental services, craft sales, etc. on Children's property is not allowed; • Use of Children's time, resources, facilities, or equipment to advance these business opportunities is not allowed. 	
5. Consulting or Outside Employment with a company that has a current or expected business relationship with Children's, is or could be a competitor of Children's	Notify the Corporate Compliance Department and complete a Conflict of Interest Disclosure form	

<p>6. Participation in Political Activities</p>	<p>No campaigning, fund raising, displaying, or wearing campaign paraphernalia allowed on Children's of Alabama owned or leased property.</p>	<p>Note 1: This does not prohibit providing employees education on legislative process or topics that have the potential to impact the mission of Children's. Note 2: If there is a question about attending or testifying before a State Legislature committee or Congress, contact the Government Relations Department.</p>
<p>7. Service on Boards for an organization that conducts business with, seeks to conduct business with, or competes with Children's</p>	<p>Notify the Corporate Compliance Department and complete a Conflict of Interest Disclosure form</p>	<p>Note: Any compensation received for Board Service during an employee's work time will be remitted to Children's.</p>
<p>*If you receive a vendor gift or encounter a situation that is not defined in this list, please contact us through email, or call the Corporate Compliance Officer at 205-638-7134 or the Compliance Coordinator at 205-638-2370 to guide you and discuss the possible need to complete a Conflict of Interest Disclosure form.</p>		