

	SECTION: Compliance	NO: CMP 007
	TITLE: Conflicts of Interest	DISTRIBUTION: Corporate and all Facilities
Original Date of Issue: 08/01/14		Date of Approval:
Revised: 06/2023		

Scope:

All Team Members of Summit Behavioral Healthcare, LLC (Summit BHC), including facilities and their employees, independent contractors and professional staff, Summit Board of Managers (Summit BHC Board), and other individuals authorized to act on behalf of Summit BHC.

Purpose:

To provide a policy for Team Members concerning the identification, disclosure, and management or elimination of potential and actual conflicts of interest. Activities of Summit BHC and Team Members involving other businesses, organizations or individuals must not interfere or conflict with their duties to Summit BHC or cause loss or embarrassment to Summit BHC, its subsidiaries or affiliates. As indicated, Team Members must identify and disclose such situations to the Compliance Department so that the situation can be managed or eliminated as set out below.

Policy:

Team Members should not put themselves in a position where their private interests interfere, or appear to interfere, in any way with the interests of Summit BHC, its subsidiaries or affiliates. Conflicts of interest may also arise when a Team Member’s immediate family commits actions, participates in activities, or has interests that interfere with the interests of Summit BHC, its subsidiaries or affiliates. Team Members may not enter into any activity or transaction that would interfere with their ability to perform their duties or cause financial or reputational loss to Summit BHC, its subsidiaries or affiliates.

The following descriptions of conflicts of interest, are not all inclusive as situations may arise that require investigation to determine significance:

1. Having direct or indirect interests or business relationships which may affect the Team Member’s conduct, judgment and/or objectivity in performing their duties. These include relationships with vendors, other employers, clients, physicians, or competitors that may influence the Team Member’s decision-making and job performance.
2. Conducting business for another company or individual while on Company time where the Team Member is being compensated simultaneously by both entities.

3. Generally, a Team Member is considered to have conflicts of interest if they hold a part-time or full-time position with a known competitor or like business venture. If, however, the Team Member voluntarily divulges the additional employment to their supervisor, the supervisor may approve the employment as long as it does not interfere with the Team Member's work performance.
4. Using Team Members, resources or property for another business, outside activities or personal reasons.
5. Divulging confidential and proprietary information about Summit BHC to outside businesses or for personal gain. Any Team Member who has access to confidential and proprietary information should take all reasonable steps to ensure that there is no intentional, unintentional or inadvertent disclosure of this information.
6. Accepting gifts, favors, or entertainment that goes above and beyond usual and customary courtesies associated with common and acceptable business practices. For further guidelines on acceptance of gifts, favors, or entertainment, reference policy CMP 006 - Gifts.
7. Providing services, supplies, or property either by purchase, rental or lease to Summit BHC, its subsidiaries or affiliates by a Team Member. It is incumbent upon the Team Member to voluntarily divulge the relationship or interest to the Compliance Department or Local Compliance Officer who will ensure that the decision to or not to engage in the business will be made by an individual within Summit BHC who has no personal interest in the transaction.
8. Soliciting or petitioning for contributions, gifts, gratuities, tickets, or entertainment from physicians, vendors, clients, or other individuals or businesses who have business relationships with Summit BHC, its subsidiaries or affiliates by a Team Member or Team Member's family member.
9. Borrowing materials, money, equipment, or Team Members from a vendor, physician, client or competitor to utilize for Summit BHC business by and Team Member or Team Member's family member. Exclusions include bank transactions or other business institutions during the course of normal business.

Procedure:

Duty to Disclose

All Team Members are required to disclose any personal or business relationships that may be an actual or potential conflict of interest to their supervisor or Human Resources at the time of hire or initial contract or when any material change occurs that results in a new actual or potential conflict of interest. Team Members will disclose this information on the Summit BHC Conflict of Interest Disclosure Form.

Certain Team Members have additional reporting requirements. All Members of the Summit BHC Board, Corporate and Facility-level management, clinical personnel on the medical staff, and those who engage in business with third parties on behalf of Summit BHC must submit a Conflict of Interest Disclosure Form annually.

If, during disclosure, a conflict is identified, the relationship will be reviewed by the Compliance Department to determine appropriateness of employment. Any Team Member who intentionally violates this policy will be subject to the disciplinary process, up to and including termination.

In connection with any transaction or arrangement that may create an actual or potential conflict of interest, a Team Member shall disclose in writing the existence and nature of his/her financial interest and all material facts to the Compliance Department.

Services for Competitors or Vendors.

No Team Member shall perform work or render services for any competitor of Summit BHC or for any organization with which Summit BHC does business, or which seeks to do business with Summit BHC, without the approval of his/her supervisor.