

# BURRELL COLLEGE OF OSTEOPATHIC MEDICINE

## STANDARD OPERATING PROCEDURES

<b>Conflict of Interest Disclosure</b>		<b>SOP #: HR.021.01</b>
Effective Date	1/26/2017	
Last Revision/Review	8/31/2020	

### 1. Purpose

All employees of Burrell College of Osteopathic Medicine (Burrell) shall disclose and avoid any conflicts of interest pertaining to any decisions or matters before the organization in which a member and/or any member of his or her immediate family has a conflict of interest, financial or otherwise.

### 2. Related Policy/Authority

[Policy B1041](#)

### 3. Faculty/Staff Responsibilities

All regular, contracted, and temporary employees, faculty and staff, that are employed by Burrell.

### 4. Definitions/Abbreviations

A conflict of interest is defined as any contract, transaction, or other matter between BCOM and one or more of its employed members or Board of Trustees members, or between the BCOM and any other corporation, firm, association, or other entity in which one or more of BCOM's employees or Board of Trustees member are officers, directors, or members and are financially or otherwise interested in this other entity.

Immediate family shall mean a member's spouse, child/children, grandchild/grandchildren and the brothers, sisters, parents, grandparents, nieces, or nephews of a member or his/her spouse.

### 5. Procedural Steps

1. Burrell employees are required to submit a Conflict of Interest (COI) form annually to the Office of Human Resources. In the course of a year if any COI arises the employee must make a full disclosure of the COI to their immediate supervisor who will then inform the Department Head, and the Office of Human Resources.
2. Conflict of Interest Disclosure forms, or a disclosed possible conflict, or a possible perceived conflict, will be reviewed by the Office of Human Resources and Executive Leadership.
3. While the COI is under review the employee should not participate in discussion of or decision on such matter.
4. The Office of Human Resources may require the employee's supervisor to complete a Conflict of Interest Management Plan which shall be reviewed by the employee, the employee supervisor, the Department Head, and the Office of Human Resources in consultation with the Office of Compliance, as necessary.
5. The failure of an employee to make a disclosure as described herein may result in the avoidance of such agreement, contract, lease, or other matter at the discretion of Burrell of this relationship, product or service.
6. Employees will be required to update a Conflict of Interest Disclosure form, annually. If a Conflict of Interest Management Plan exists, it must also be reviewed and signed annually.

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### 6. Reports/Charts/Forms/Attachments/Cross References

<http://bcomnm.org/policy-b1041/>

Conflict of Interest Form

Conflict of Interest Management Plan

### 7. Maintenance

Human Resources; to be reviewed every January.

### 8. Signature

Approved by	08/31/2020
Director of Human Resources	Date

### 9. Distribution List

Internal/External

### 10. Revision History

Revision Date	Subsection #	Summary of Changes	New/Cancellation/ Replacement Procedure? (if applicable)	Approval Date
8/31/2020	5	Updated information on COI Management Plan and wording of COI process.		