

**BURRELL COLLEGE  
OF OSTEOPATHIC MEDICINE  
POLICY MANUAL**

SECTION: Human Resources

BCOM Policy 4304

TOPIC: Conflict of Interest – All Employees

Approval Date:  
9/13/2016, 1/26/17

Ratified: 11/29/16

Effective Date: 1/26/17

Approved: Signature on File

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\*Policy reformatted and renumbered for uniformity May 2016

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It is a policy of, the Burrell College of Osteopathic Medicine (BCOM), that all employees 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.

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

BCOM employees are not permitted to participate in any discussions of any matters other than to disclose a conflict, or decide on any matters before BCOM when such matters would result in a conflict of interest or financial gain or loss to the member or the member's immediate family. Such matters would include, but not be limited to, contracts to furnish goods and/or services, leases or purchase agreements of real or personal property, or such like matters which would result in conflict of interest or a financial gain or loss. Upon learning that a matter before BCOM would create a conflict of interest to an employee, that employee must make a full disclosure to BCOM's next chain of command of his or her financial interest in such manner, and the employee shall not further participate in any discussion of or decision on such matter. 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 BCOM of this relationship, product or service. For the purpose of this policy, the term "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 or her spouse. Employees will be required to update a Conflict of Interest Disclosure form, annually.