

**BURRELL COLLEGE
OF OSTEOPATHIC MEDICINE
POLICY MANUAL**

SECTION: General Administration & Leadership

BCOM Policy: B1041

TOPIC: Conflict of Interest

Approval Date: 1/22/19

Revised: 11/15/19 - *Previously B2020*

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Approved: Signature on File

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POLICY

Members of the Board of Trustees and employees of the College 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.

RESPONSIBLE OFFICIAL(S):

Office of Human Resources, Board of Trustees

DEFINITION(S):

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.

PROCEDURE:

1. Members of the Board of Trustees and employees shall not decide/vote on any matters before BCOM when such matters would result in a conflict of interest with the member or member's immediate family. Such matters shall include, but not be limited to, financial gain or loss, contracts to furnish goods and/or services or leases or purchase agreements of real or personal property.
2. Upon learning that a matter before BCOM would create a conflict of interest to an employee or Board of Trustee member, the employee or member must make a full disclosure to BCOM's next chain of command of his/her financial interest in such matter and the employee or member shall not further participate in any discussion of or decision on such matter.
3. The failure of an employee or Board of Trustee member to make a disclosure as described herein may result in the avoidance of such agreement, contract, lease, or other matter as the discretion of BCOM of this relationship, product or service.
4. Employees and Board of Trustees members shall be required to update a Conflict of Interest disclosure form annually.

CROSS REFERENCE: Board of Trustees Bylaws