

# TRI-COUNTY MEDICAL ASSOCIATES, INC.

<b>Effective Date:</b>	May 2017	<b>Manual:</b>	Corporate Compliance
<b>Distribution:</b>	All Departments		
<b>Originating Dept. Committee:</b>	Corporate Compliance		
	Corporate Compliance Officer/ Interim	<b>Signature:</b>	 Jeanne P. Lynskey
<b>Senior Management:</b>	Corporate Compliance Liaison Officer	<b>Signature:</b>	 Zofia Bibeault
	President	<b>Signature:</b>	 Philip Ciaramicoli
	Senior Administrator	<b>Signature:</b>	 Nancy Jolicœur
	Medical Director	<b>Signature:</b>	 Elizabeth Siraco, MD
<input checked="" type="checkbox"/> <b>New</b>			
<input type="checkbox"/> <b>Supersedes:</b>	<u>Conflicts of Interest</u> (Policy Name)	<u>5/01/2013</u> (Effective Date)	<u>6/01/2008</u> (Origination Date)

**Subject:** Conflicts of Interest

**Purpose:** A conflict of interest may occur when personal or financial considerations influence, or may create the appearance of influencing, an individual's judgment and discretion. It is important that Tri-County Medical Associates, Inc. ("TCMA") ensures that all decisions pertaining to the business of TCMA and patient care are made objectively and within established guidelines to minimize the risk of actual or potential conflicts of interest from arising.

**Policy:** TCMA shall minimize the risk of actual or potential conflicts of interest from arising at TCMA by ensuring that all decisions pertaining to its business activities and patient care are conducted with objective purposes without personal or financial motivation by any employee or physician of TCMA.

**Procedure:**

1. TCMA shall implement appropriate internal processes to ensure that all decisions pertaining to its business activities and patient care are conducted with objective purposes without personal or financial motivation by any employee of TCMA.

2. All TCMA employees are required to disclose any actual or potential conflict of interest to their supervisor, Corporate Compliance Liaison Officer and/or the Corporate Compliance Officer, so that they may obtain assistance on how to respond to the matter.
3. For purposes of this policy, a conflict of interest shall include any situation in which a financial or personal consideration influences, or may appear to influence, an individual's ability to exercise objective business judgment, deliver patient care or otherwise do their job.
4. Examples of possible conflicts of interest shall include, but not be limited to, the following:
  - Requesting or accepting anything of material value in exchange for or as a result of services performed in the course of employment;
  - Conducting business on behalf of TCMA with any company in which one has an interest; (e.g., contracting with outside vendors, such as, pharmaceutical and medical device companies in which one has a personal or financial interest);
  - Hiring a family member in the same department and/or office.
  - Having direct supervision of a family member.
5. All TCMA employees are prohibited from pursuing any action that may constitute an actual or potential conflict of interest without first obtaining approval from the Compliance Liaison Officer and/or the Corporate Compliance Officer.
6. Depending upon the severity of the situation, failure to comply with this policy may subject a TCMA employee to disciplinary action, up to and including termination of employment.
7. The Corporate Compliance Officer shall ensure that TCMA employees and medical staff are educated on this policy and shall periodically monitor and audit the effectiveness of the operational and/or internal controls that have been implemented to ensure compliance with this policy.