



MERITUS SCHOOL OF OSTEOPATHIC MEDICINE

Conflict of Interest Policy

Policy Number: BOT-1.3.2a

Effective Date:

Approved by: _____

Policy & Procedure Statement

It is a policy of the Meritus School of Osteopathic Medicine, that all board members, employees, and credentialed instructional staff shall disclose and avoid any conflicts of interest pertaining to any decisions or matters before the organization in which a 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 the COM and one or more of its board members, employees, or credentialed instructional staff, or between the COM and any other corporation, firm, association, or other entity in which one or more of the COM's employees are officers, directors, or members and are financially or otherwise interested in this other entity.

COM employees are not permitted to participate in any discussions of any matters other than to disclose a conflict or decide on any matters before the COM 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 would create a conflict of interest to an employee, that employee must make a full disclosure to their COM supervisor or to the Board 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 disciplinary action. For the purpose of this policy, the term "immediate family" shall mean a member's spouse, significant other, child/children, grandchild/grandchildren and the brothers, sisters, parents, grandparents, nieces or nephews of a member of the family of his or her spouse. All Board Members and Employees will be required to complete a Conflict of Interest Disclosure annually.