

COMMUNITY MENTAL HEALTH AUTHORITY

ADMINISTRATIVE POLICY AND PROCEDURES MANUAL				
Chapter Organizational Quality	Section Organizational Leadership	Chapter 01	Section 02	Subject 08
Subject Conflicts of Interest	Authorization		Approved: 11/26/19 Replaces: 12/18/18	

Reviewed/No Updates: November 2021

- I. **PURPOSE:** To ensure the integrity of decisions made on behalf of the individuals served.

- II. **APPLICATION:** All Board Members, employees, contract providers, volunteers, interns, and programs under the governance of the Community Mental Health Authority (CMHA).

- III. **DEFINITIONS:** Conflict of Interest: Competing personal and professional interests whereby personal interest may conflict with the role and responsibilities and best interest of CMHA.

- IV. **POLICY:** Community Mental Health Authority prohibits its Board Members, employees, contract providers, volunteers, and interns from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of the Agency, its clients, or its suppliers. Service and business decisions are free of personal bias, interest, or gain. Since it is impossible to describe all of the situations which may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and only include some of the more clear-cut examples.

- V. **PROCEDURE:** Board Members, employees, contract providers, volunteers, and interns:
 - A. are expected to represent CMHA in a positive and ethical manner and have an obligation both to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their supervisor.
 - B. are not to engage directly or indirectly, either on or off the job, in any conduct that is disloyal, disruptive, competitive, or damaging to the Agency. Such prohibited activity also includes any illegal acts in restraint of trade.
 - C. are not to accept any outside employment (either compensated or uncompensated) with any organization that does business with the Agency or is a competitor of the Agency. This prohibition on employment includes serving as an advisor or consultant to any such organization, unless that activity is conducted as a representative of the Agency.
 - D. must disclose any financial interest they or their immediate family have in any firm which does business with the Agency or which competes with the Agency. The Agency may require divestiture of such interest if it deems the interest to be in conflict with its best interests.

E. are not to give, offer, or promise, directly or indirectly, anything of value to any representative of a client, of a potential client, or of a financial institution in connection with any transaction or business that the Agency may have with such client, potential client, or financial institution.

VI. REFERENCES AND LEGAL AUTHORITY: CARF Behavioral Health Standards; NorthCare Network Conflict of Interest Policy; NorthCare Network Code of Conduct

VII. EXHIBITS: None