

ADMINISTRATION

POLICY MEMORANDUM

POLICY TITLE:	Conflict of Interest Policy
POLICY NUMBER:	MCH-3016
JCAHO FUNCTION AREA:	Management of Human Resources
POLICY APPLICABLE TO:	All Employees of the Ector County Hospital District, Medical Center Health System and the District Facilities
POLICY EFFECTIVE DATE:	December 9, 1994
POLICY REVIEWED:	12/1/96;12/1/98; 5/30/04; 6/24/09; 12-5-11
POLICY REVISED:	2/8/99; 5/30/04; 12/05/11

ALTERNATE WORD SEARCH: conflict; interest

POLICY STATEMENT:

In order to perform their duties with honesty and fairness and in the best interest of the Ector County Hospital District and Medical Center Health System and its patients, employees must avoid conflicts of interest in their employment. The purpose of this policy is to set out those matters which are conflicts of interest and which are prohibited. These standards may not cover every possible situation. If an employee has any doubt or any question about any of his or her proposed activities, guidance or advice should be obtained from the Executive Director of Human Resources or the Director of HR Operations in the Department of Human Resources.

1. In order to avoid possible conflicts of interest, employees of the Ector County Hospital District, Medical Center Health System or other District facility should not:
 - a. Hold, directly or indirectly, a position or office or a material financial interest in any business enterprise from which the District, Medical Center Health System or other District facility obtains goods or services without fully disclosing that position, office or interest to and obtaining the written consent of those persons set out in paragraph 2.
 - b. Hold, directly or indirectly, a position or office in or a material financial interest in any concern or entity with which the District, Medical Center Health System or other District facility competes without fully disclosing

such position or office to and obtaining the written consent of those persons set out in paragraph 2.

- c. Render directive, managerial or consultative services to any concern or entity from which the District, Medical Center Health System or other District facility obtains goods or services or with which the Hospital or other District facility competes without fully disclosing such directive, managerial or consultative services to and obtaining the written consent of those persons set out in paragraph 2.
- d. Engage in any activity, including but not limited to the purchase or sale of services, goods, property or property rights, in competition with the District, Medical Center Health System or other District facility without fully disclosing such activity to and obtaining the written consent of those persons set out in paragraph 2.
- e. Accept gifts, excessive entertainment or other favors or gratuities from any concern, entity or person that does or is seeking to do, business with or is in competition with the District, Medical Center Health System or other District facility. A "gift" includes any cash or non-cash payments, discounts, favors, meals, entertainment, use of aircraft or automobiles and services or other consideration of value. This paragraph, however, does not include nor prohibit the acceptance of items of nominal or minor value (a) that are clearly tokens of respect or friendship and not related to any particular transaction or activity of the District, Medical Center Health System or other District facility; or (b) which do not go beyond the common courtesies usually associated with accepted business practices, such as baseball caps and the exchange of lunch or dinner meetings which occur as a normal part of a healthy business relationship.
- f. Make any payment, except for goods or services rendered or to be rendered or give any gift or gratuity to any concern, entity or person doing business directly or indirectly with the District, Medical Center Health System or other District facility, including agents or representatives of any such concern, entity or person, which goes beyond the common courtesies usually associated with accepted business practices.
- g. Use any property of the District, Medical Center Health System or other District facility for private or individual purposes or benefit without fully disclosing that use to and obtaining the written consent of those persons set out in paragraph 2.
- h. Utilize the purchasing mechanism of the District, Medical Center Health System or other District facility for private or individual purchases. Provided, however, uniforms to be worn by an employee at Medical Center Health System or other District facility may be obtained through such purchasing mechanism. Payment or arrangements for payment through the payroll deduction plan shall be made upon receipt of such uniforms.

- i. Work at the District, Medical Center Health System or other District facility through any agency or other contractor or subcontractor while simultaneously an employee of the District, Medical Center Health System or other District facility unless approved by the Chief Executive Officer.
2. The Chief Executive Officer and all Executive Staff members shall make disclosures to the Board of Directors by written notice delivered to the Secretary of the Board. The Board may consent or may not consent at its discretion. All other employees shall make disclosures to the Chief Executive Officer and to the President of the Board of Directors by written notice delivered to the Chief Executive Officer. The Chief Executive Officer and the President of the Board may consent or may not consent at their discretion but if both do not consent, the matter shall be considered as not consented to.
 3. Violation of this policy may result in disciplinary action up to and including termination of employment.

AUTHOR'S SIGNATURE	
	Barbara Dingman Compliance Officer
AUTHORIZING SIGNATURE(S)	
	William W. Webster Chief Executive Officer
END OF POLICY	