CONFLICTS OF INTEREST:
MANAGING AND MITIGATING

Presented by
David Lane, Ph.D., CHC
Chief Compliance Officer

Providence St. Joseph Health today
Providence St. Joseph Health today

52 HOSPITALS
829 CLINICS
23k PHYSICIANS
120k CAREGIVERS
1.9m COVERED LIVES
14 SUPPORTIVE HOUSING FACILITIES
90 NON-ACUTE SERVICES

Risk and Integrity Services Compliance

2018 CONFLICTS OF INTEREST PROGRAM

ERIN MCKINNEY, COI PROGRAM MANAGER
CONFLICT OF INTEREST PROGRAM

• **Background**
  - COI Program includes caregivers (directors and above), system, community, advisory and foundation board members, medical directors and other key influencers.
  - All caregivers have the responsibility to disclose a potential conflict of interest to their manager as soon as the situation arises and the COI can be assigned.

• **COI Policies**
  - Conflicts of Interest (governance level)
  - Conflict of Interest in Research (management approved)

• **Annual Conflict of interest disclosure process**
  - Online disclosure completed via COI SMART system
  - RIS Compliance reviews disclosed conflicts
  - Conflicts managed by RIS Compliance in collaboration with different stakeholders.

2018 COI LAUNCH

- **Launch date** – April 2, 2018
- **Aligned with compliance education**
- **Submission deadline** – June 29, 2018
- **Research** (open year round)

**NEW for 2018:**
- All boards (community boards/foundation leadership), are invited to Governance Assembly March 15-17th
  - COI available (online and paper) for completion during the conference
  - Patty, David, Erin and Cambria will be in attendance
- Core leaders will attend in person Compliance Education with Sheryl
  - Paper COI forms will be completed at leadership meetings
  - Forms will be entered into COI-Smart for tracking
TIMELINE: COI AND EDUCATION PROGRAM

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<th>Finish</th>
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<tr>
<td>1. Identify and assess COI issues and determine further action</td>
<td>6/1/2018</td>
<td>5/1/2018</td>
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<td>2. Submit COI form</td>
<td>4/1/2018</td>
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<td>3. Review and determine COI form</td>
<td>5/3/2018</td>
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<td>4. Update COI form for COI form</td>
<td>6/1/2018</td>
<td>7/30/2018</td>
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<td>5. Conduct COI training for new employees</td>
<td>7/1/2018</td>
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<td>6. Conduct COI training for existing employees</td>
<td>8/1/2018</td>
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ANNUAL REVIEW PROCESS (DRAFT)
COI REVIEW PROCESS

Risk and Integrity Services (RIS)
Integrity, Compliance and Privacy
QUESTIONS?

• For additional information on the program please visit: http://in.providence.org/sss/departments/compliance/Pages/ConflictofInterest.aspx
• COI-SMART system: https://providence.coi-smart.com/login.php

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