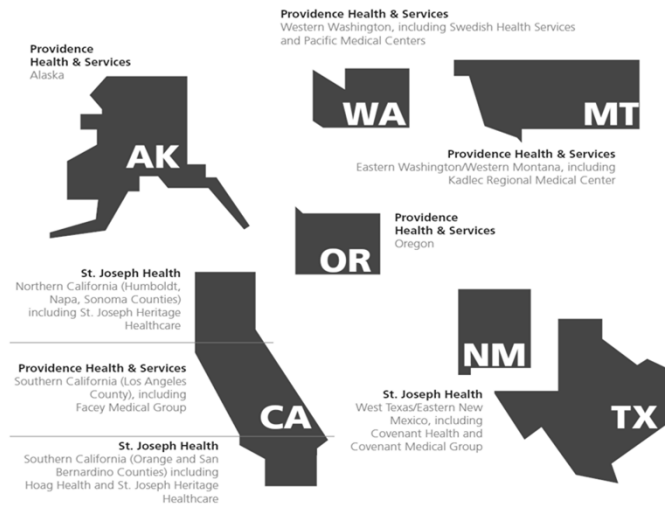


CONFLICTS OF INTEREST: MANAGING AND MITIGATING

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

Providence St. Joseph Health today



Providence St. Joseph Health today

H 52

HOSPITALS



120k
CAREGIVERS



829
CLINICS



23k
PHYSICIANS



1.9m
COVERED LIVES



90
NON-ACUTE
SERVICES



14
SUPPORTIVE
HOUSING
FACILITIES



HIGH SCHOOL,
NURSING SCHOOLS
AND UNIVERSITY

 Providence
St. Joseph Health

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 arise and the COI can be assigned

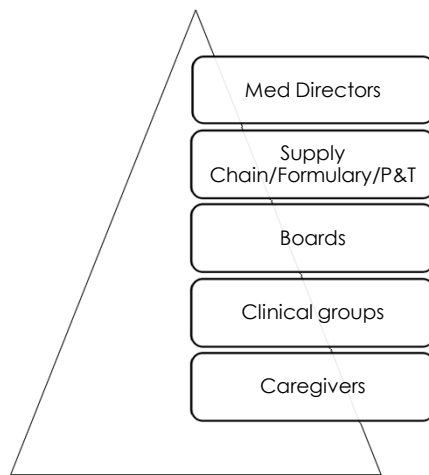
- **COI Policies**

- 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

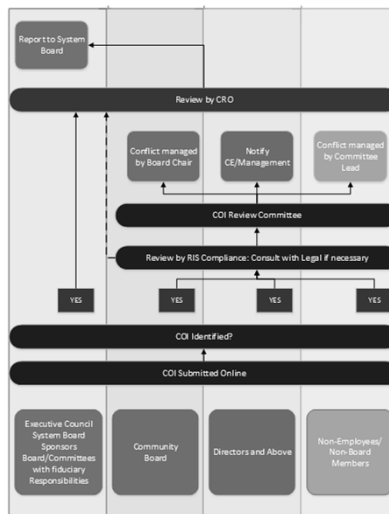
TIMELINE: COI AND EDUCATION PROGRAM

Timeline – Annual COI and Education Program (2018)

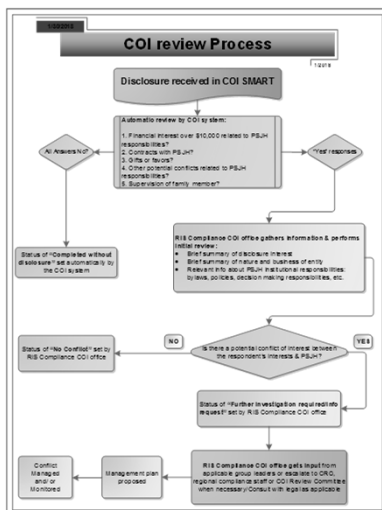
Based on a April 2 Rollout

| ID | Task Name | Start | Finish | Team | 2018 | | | | | | | | | | | | | | | | | | |
|----|---|-----------|------------|-------------------------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--|--|--|--|--|--|--|
| | | | | | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | | | | | | | |
| 1 | Data Collection / Processing (COI rosters and lists manual groups) | 1/1/2018 | 3/1/2018 | RIS | | | | | | | | | | | | | | | | | | | |
| 2 | Submission Process | 4/2/2018 | 6/29/2018 | Caregivers | | | | | | | | | | | | | | | | | | | |
| 3 | System-wide communication to all caregivers | 3/28/2018 | 6/14/2018 | RIS/ MarComm Dept. | | | | | | | | | | | | | | | | | | | |
| 4 | Optional communication to Regional Leadership | 3/7/2018 | 5/30/2018 | RIS/ICP | | | | | | | | | | | | | | | | | | | |
| 5 | Follow up: Automated emails from HLC and COI Smart to caregivers and core leaders | 5/21/2018 | 12/31/2018 | HLC/COI Smart | | | | | | | | | | | | | | | | | | | |
| 6 | RIS Compliance forwards special exceptions list to RIS Region | 7/29/2018 | 7/29/2018 | RIS Compliance | | | | | | | | | | | | | | | | | | | |
| 7 | RIS Compliance announcement of responsibility transfer to RIS Region | 7/29/2018 | 7/29/2018 | RIS Compliance | | | | | | | | | | | | | | | | | | | |
| 8 | Follow up: RIS regions collaborate with Local leadership | 7/29/2018 | 12/29/2018 | RIS/ICP | | | | | | | | | | | | | | | | | | | |
| 9 | Follow up: Collaborates with RIS region | 7/2/2018 | 12/2/2018 | Local leadership | | | | | | | | | | | | | | | | | | | |
| 10 | Follow up: Transfer continued responsibility to local leadership | 11/1/2018 | 11/7/2018 | RIS Compliance/ RIS/ICP | | | | | | | | | | | | | | | | | | | |
| 11 | Follow up: with non-compliant caregivers and their supervisors | 11/1/2018 | 12/31/2018 | Local Leadership | | | | | | | | | | | | | | | | | | | |
| 12 | COI Review – collaborate with RIS region as needed | 6/29/2018 | 12/31/2018 | RIS Compliance | | | | | | | | | | | | | | | | | | | |

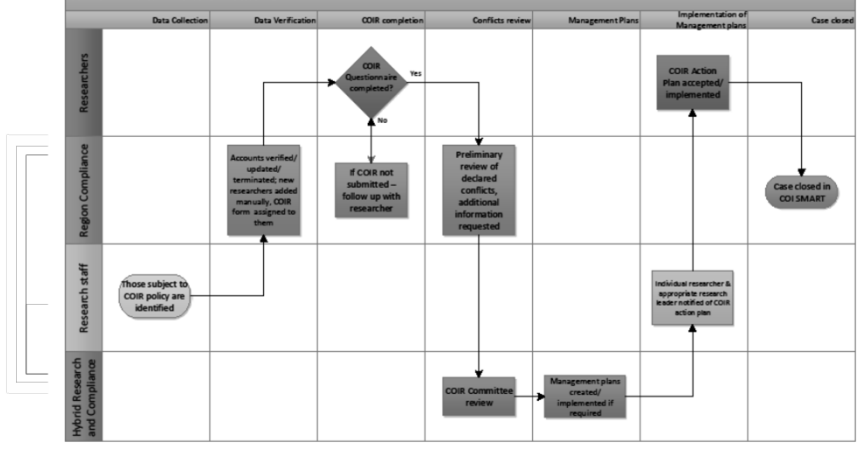
ANNUAL REVIEW PROCESS (DRAFT)



COI REVIEW PROCESS



Conflict of Interest in Research Process - DRAFT



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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