

WCHO	<i>Policy and Procedure</i>		
Department Human Resources	# of Pages: 2		
Policy Name CONFLICT OF INTEREST	Type of Policy: [<input checked="" type="checkbox"/>] WCHO [<input type="checkbox"/>] Regional [<input type="checkbox"/>] Network		
Policy Number 05.002	Effective Date	Revision Date	Approval Date
Administrative/Board of Directors Sign Off			
Administrative Signature:		Date:	
Board of Directors Signature:		Date:	

I. PURPOSE

To establish guidelines for preventing conflict of interest when staff members of Washtenaw Community Health Organization provide referrals to individuals who request or need clinical services which are not offered.

II. APPLICATION

WCHO Access/UR Department

III. DEFINITIONS

Immediate family - a staff member's spouse, parents, children, brother, or sister by blood or law.

Staff member - an employee, contractual worker, volunteer, or student.

Staff member's private practice - means a business in which a staff member or a member of her/his immediate family has a legal ownership interest (i.e., sole proprietor, partner in a partnership, member of a corporation's Board of Directors), or from which the staff member or a member of a member of her/his immediate family receives compensation.

IV. POLICY

Washtenaw Community Health Organization shall provide referrals to individuals who request or need services not offered through WCHO contract agencies. Staff members shall provide referrals according to the procedures specified below, in order to assure that the selection of referrals is not influenced by any consideration of possible financial gain for themselves (other than their normal salary or wage) or members of their immediate family.

V. EXHIBITS

None

VI. REFERENCES

WCHO Policy, "Resource Files"

VII. PROCEDURES

<u>WHO</u>	<u>DOES WHAT</u>
Program Supervisor or Designee	1. Maintains resource manuals/files. This listing or must <u>not</u> include a staff member's private practice or business.
Staff Member	2. Will alert Supervisor to any outside employment or business holding which may present a conflict of interest.
	3. Will provide clients a number of external referrals as located in resource files/manuals as appropriate.
	4. States explicitly to the individual requesting a referral that the information being provided does <u>not</u> constitute a recommendation or authorization of care by WCHO if the WCHO will not be financially responsible.
Access	5. If the WCHO is financially responsible for the referral services, Access will assure that the referred provider meets approved standards to provide services to WCHO members.
Program Manager/Designee	6. Refers questions regarding these referral procedures to the Provider's Director's office for response.