



NOORDA COLLEGE
of OSTEOPATHIC MEDICINE

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| Policy Name: | Conflict of Interest |
| Approval Authority: | Board of Trustees |
| Responsible Executive: | President |
| Responsible Office(s): | President's Council Title IX Coordinator |
| Effective: | March 2019 |
| Expires: | January 2024 |
| Last Revised: | September 2021 |
| Next Review Date: | N/A |

Conflict of Interest Policy

Policy Statement

All board members, professional and non-professional full time employees, and all credentialed instructional staff shall disclose and avoid any conflicts of interest pertaining to any decisions or matters before the organization in which a member of his or her immediate family has a conflict of interest, financial or otherwise.

If he or she has existing or potential financial or other interests that impair or appear to impair his or her independent, unbiased judgment in the discharge of his or her responsibilities to the Noorda-COM. By reason of their appointment, Trustees appointed by the Parent Corporation or Management Corporation shall not be considered to have a conflict of interest by virtue of their relationship with the Parent Corporation or Management Corporation, respectively.

Entities Affected by the Policy

Board members
Full-time employees, professional and non-professional
Credentialed instructional staff

Policy Procedures

If he or she shall disclose any possible conflict of interest upon learning that a matter before Noorda-COM would create a conflict of interest. The individual must make a full disclosure to their direct supervisor, department or committee chair of his or her financial interest, and shall not further participate in any discussion of or decision on such matter. He or she shall absent himself or herself from discussions of, and abstain from voting on, such matters that may be under consideration. The minutes of such meetings shall reflect that a disclosure was made and that the member with a conflict of interest abstained from discussion and voting. Any member who is uncertain as to whether a conflict of interest may exist in any matter may request that the Committee or Council Chair resolve the question in his or her absence by majority vote.

Each board members, professional and non-professional full time employees, and all credentialed instructional staff shall complete and sign a disclosure form annually

Definitions

Conflict of interest - any contract, transaction, or other matter between Noorda-COM and one or more of its board members, professional and non-professional full time employees, or credentialed instructional staff, or between the Noorda-COM and any other corporation, firm, association, or other entity in which one or more of Noorda-COM's employees are officers, directors, or members and are financially or otherwise interested in this other entity.

Entity - corporation, firm, association, or other in which one or more of Noorda-COM's employees are officers, directors, or members and are financially or otherwise interested.

Matters - includes, but not be limited to, contracts to furnish goods and/or services, leases or purchase agreements of real or personal property, which would result in a financial gain or loss.

Family member - as a person connected by blood or marriage or an individual who is residing in the same household as the board members, professional and non-professional full time employees, and all credentialed instructional staff

Responsibilities

Board members
Professional and non-professional, full-time employees
Credentialed instructional staff

Policy Violations

The failure of an employee to make a disclosure as described herein may result in the avoidance of such agreement, contract, lease, or other matter at the discretion of Noorda-COM of this relationship, product or service.

Interpreting Authority

Board of Trustees

Statutory or Regulatory References

Relevant Links

Policy Adoption Review and Approval