



# The GW Medical Faculty Associates

Category: Compliance	Effective Date: 01/01/2012
Policy Name: Conflicts of Interest	Revised Date: 01/17/2023

## **PURPOSE:**

To establish the GW Medical Faculty Associates (“MFA”) policy for disclosing and managing actual, potential, or perceived conflicts of interest.

## **SCOPE:**

This policy is applicable to all MFA workforce members.

## **POLICY:**

A conflict of interest (“COI”) occurs when a workforce members’ financial, professional, or other personal interests may directly or indirectly affect, or have the appearance of affecting, their professional judgment in exercising their responsibilities at the MFA.

Decisions made on behalf of the MFA must be made in good faith, in the best interests of the MFA, and not for personal gain. All MFA workforce members must avoid situations in which outside personal, familial, or business interests could conflict or appear to conflict with fiduciary responsibility to the MFA. The MFA has an obligation to appropriately address both the substance and the appearance of a conflict of interest.

As a medical practice, MFA and its workforce members also must avoid situations where outside personal, familial, or business interests could create a potential regulatory problem for MFA or where an outside observer could reasonably believe that obligations to patients might be compromised.

All MFA workforce members are required to immediately disclose each actual or potential COI that arises upon becoming aware of it. All material facts regarding the potential conflict must be disclosed and workforce members must respond to and cooperate with any inquiries regarding the matter. Disclosures should be updated as facts and circumstances change.

Additionally, on an annual basis, or more often if circumstances require, all providers and selected non-provider employees will be directed to complete a COI annual disclosure form. MFA may also require selected non-employee members of the workforce to complete a COI disclosure form as appropriate. The timing and format of the disclosure form shall be established by the MFA’s Chief Compliance Officer (“CCO”). The CCO, or their designee, shall review disclosure records and



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determine whether an actual or potential conflict is present. If such a determination is made, the CCO, or their designee, shall work in collaboration with appropriate operational leaders to implement management plans to mitigate actual, potential, or perceived COIs.

### DEFINITIONS:

N/A

### RESPONSIBILITY:

The CCO shall issue procedures and guidance for the disclosure, review, evaluation and management of actual and potential conflicts of interests and for the imposition and auditing of imposed management plans.

### REFERENCES:

N/A

### Executive Approval Signatures:

DocuSigned by:

*Barbara Lee Bass, MD*

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Chief Executive Officer

2/23/2023 | 5:59 AM PST

Date

DocuSigned by:

*[Signature]*

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Chief Compliance Officer

2/23/2023 | 9:16 AM EST

Date