



TITLE Conflicts of Interest (Code of Conduct Addendum, Part 2 of 5)		IDENTIFICATION NUMBER A01-030	
ORGANIZATION(S) University of Kentucky / UK HealthCare	SITES AFFECTED X Enterprise <input type="checkbox"/> Chandler <input type="checkbox"/> Good Samaritan <input type="checkbox"/> KCH <input type="checkbox"/> Ambulatory	CATEGORY X Enterprise <input type="checkbox"/> Nursing <input type="checkbox"/> Department <input type="checkbox"/> Guideline <input type="checkbox"/> Protocol	REPLACES: CHANDLER HP01-03
REVIEW CYCLE <input type="checkbox"/> 1 year X 3 years REVIEW DATES: 8/12/2015; 10/1/2018; 02/24/2020; 3/6/2023		EFFECTIVE DATE: 4/15/2023	

POLICY STATEMENT

UK HealthCare prohibits participation in any activity that may conflict with the purpose or objectives of the UK HealthCare Enterprise.

PURPOSE

The purpose of this policy is to provide guidance for UK HealthCare Members regarding participation in activities that may be in conflict with the purpose or objectives of the UK HealthCare enterprise.

SCOPE

The policy applies to all UK Healthcare Members.

DEFINITIONS

UK HealthCare Members

“UK HealthCare Members” is defined as University of Kentucky Trustees, UK HealthCare employees, trainees, students, volunteers and representatives acting on behalf of the University involved in healthcare delivery and to all faculty, staff and trainees in the academic programs of the University of Kentucky Colleges of Medicine, Dentistry, Nursing, Pharmacy, Health Sciences and Public Health whether or not those individuals engage in clinical care.

PROCEDURES

1. Without prior authorization, no UK HealthCare Member shall:
 - a) Work as a sub-contractor, vendor, supplier, consultant, etc., for UK HealthCare.
 - b) Perform a service for an outside enterprise that does business with UK HealthCare.
 - c) Accept an unauthorized gift, loan, food, or other favor from an outside agent that does, or seeks to do, business with UK HealthCare. See [A01-160 \(Annual Disclosure of Financial Conflicts of Interest\)](#).
 - d) Accept a loan from a patient for whom they have provided care, services, and/or referred services.
 - e) Accept a gift, food, or other favor from a patient for whom they have provided care, services, and/or referred services except small tokens of gratitude with an estimated cash value less than \$50 may occasionally be accepted. Contact the Office of Corporate Compliance with questions.

- f) Disclose or otherwise use confidential UK HealthCare information outside of official job requirements.
 - g) Compete with UK HealthCare, either directly or indirectly, in the purchase or sale of property or property rights.
 - h) Represent another health care institution in any transaction where they or a relative have a substantial interest.
 - i) Act as a representative of UK HealthCare in correspondence or contact with an external agency or person, except as a part of specific job function, unless approved by UK HealthCare Administration or an authorized designee.
2. UK HealthCare Members and their immediate families shall not:
- a) Perform contracted services for UK HealthCare where the UK HealthCare member is in a position of influence.
 - b) Accept unauthorized gifts, loans, food, or other favors from an outside agent which does, or seeks to do, business with UK HealthCare.
3. All UK HealthCare Members shall follow these guidelines:
- a) They shall disclose any interest or relationship that might cause a conflict of interest, or give the appearance of a conflict of interest, and may not pursue any such activity until it has been authorized.
 - b) They shall contact the Office of Corporate Compliance immediately upon becoming involved in any possible conflict of interest. Contact information is located on the Corporate Compliance website.
 - (i) To make a report, staff may use the on-line report form or call the University of Kentucky Comply Line at (877) 898-6072.
 - (ii) The Comply Line is a toll-free number and is staffed by live operators 24 hours a day, seven days a week. This site is managed by a third-party company.
 - c) They shall not divulge or otherwise use any confidential UK HealthCare information for a period of twelve months after leaving UK HealthCare employment.
 - d) The Executive Vice President for Health Affairs and Chief Physician Executive, in conjunction with the Chief Compliance Officer or designee, shall make all final decisions involving compliance with this policy.

Questions

Any questions regarding this policy should be directed to the Office of Corporate Compliance.

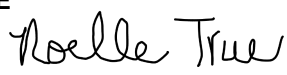
References

Additional information, definitions, and authorization procedures are outlined in policies and administrative regulation below:

1. [A01-005, Code of Ethics \(Code of Conduct Addendum, Part 1 of 5\)](#)
2. [A01-105, Industry Representatives and Service Providers \(Code of Conduct Addendum, Part 3 of 5\)](#)
3. [A01-155, UK HealthCare Members Interactions with Industry Representatives and Service Providers \(Code of Conduct Addendum, Part 4 of 5\)](#)
4. [A01-160, Annual Disclosures of Financial Conflict of Interest \(Code of Conduct Addendum, Part 5 of 5\)](#)

5. [AR 3:9 \(Faculty Consulting and Other Overload Employment\)](#)

APPROVAL

NAME AND CREDENTIALS: Noelle True	NAME AND CREDENTIALS: Brett Short
TITLE: Assistant Chief Compliance Officer	TITLE: Chief Compliance Officer
SIGNATURE 	DATE 3/31/23
SIGNATURE	DATE