



Broward Behavioral Health Coalition, Inc.	
Policy Title: Conflict of Interest	
Policy Number: BBHC.0025	Contract: JH343
Effective Date: 5/16/2013	Revision Date: 7/24/2023
Responsible Department: Administration	
Approved by: <small>DocuSigned by:</small> Danica Mamby, Managing Director of Administration	
Signature: <u><i>Danica Mamby</i></u> <small>7149EC975596488...</small>	Date: <u>7/24/2023</u>
Approved by: <small>DocuSigned by:</small> Silvia Quintana, Chief Executive Officer	
Signature: <u><i>Silvia Quintana</i></u> <small>D999499950A143C...</small>	Date: <u>7/24/2023</u>

Policy:

It is the policy of Broward Behavioral Health Coalition, Inc. (BBHC) to implement a conflict of interest policy to protect the organization's interest when considering entering into a transaction or arrangement that might benefit the private interest of an officer, director, or staff of the organization or might result in a possible excess benefit transaction.

Purpose:

The purpose of this policy is to clarify conflict of interest by BBHC staff and Board of Directors as it relates to BBHC's business matters and outside consulting.

Conflict of interest in BBHC business matters and outside consulting are covered in two separate sections:

A. BUSINESS MATTERS

- a. **PURCHASES** – BBHC does not purchase goods or services directly or indirectly from its employees and staff, other than those which are specified in the condition of employment with BBHC. If an unusual situation arises which might warrant consideration of such a transaction, it must be reviewed and approved by the CEO of BBHC or a designated representative of BBHC.
- b. **SALES** – BBHC does not sell services or materials to its employees and staff for their personal use except for items which are normally sold, or services provided by BBHC or BBHC subcontracted providers.
- c. **GIFTS** - The association between providers and BBHC employees and staff should always be on a professional and business-like basis. Gratuities from providers to BBHC employees or staff are not to be accepted by BBHC



employees and staff. Staff shall discourage the offer of, and decline, individual gifts, or gratuities of value in any way that might influence the purchase of supplies, equipment, and/or services. Staff shall notify their immediate supervisor if they are offered such gifts. Additionally, in accordance with contractual obligations, BBHC employees or staff will not offer to give or give any gift to any DCF employee.

- d. **SELECTION, AWARD OR ADMINISTRATION OF A CONTRACT OR GRANT** - No BBHC employee or staff shall participate in the selection, award, or administration of a contract involving BBHC including, but not limited to a contract supported by state or federal funds, if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, or any member of her or his immediate family, his or her partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected. If there is a conflict of interest, the employee must report it and exclude him or herself from participating in the proceedings. Documentation of this reporting and exclusion from the proceedings will be kept on file at BBHC as long as records are retained for the transactions in question. No gratuities may be solicited or received by employees in the administration of a contract. Gratuities may not be solicited or accepted in the administration of a contract or grant.
- e. **SELECTION OR ADMINISTRATION OF A VENDOR** - No BBHC employee or staff shall participate in the selection or administration of a vendor if a real or apparent conflict of interest would be involved. Such a conflict would arise if an employee or staff, or any member of his/her immediate family, his/her spouse/partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in the vendor selected.
- f. **GRATUITIES** – Gratuities may not be solicited from vendors. Unsolicited gifts of a nominal value of \$50 or less may be accepted with the approval of the CEO from vendors.

B. CONSULTING

- a. BBHC employees and staff may accept opportunities for outside consulting and similar services in their fields of specialization or expertise, provided this work does not interfere or conflict with their BBHC work responsibilities. BBHC employees and staff may not profit from private services while receiving compensation from BBHC for the performance of these same services. The time involved in consulting activities shall be during non-BBHC working hours, i.e., vacation, holidays, weekends, etc.



- b. BBHC assumes no responsibility for private professional services rendered by BBHC employees and staff. When BBHC employees perform services in a private capacity, they must make it clear to those who employ them that they are not acting as agents of BBHC.
- c. If BBHC facilities, staff or equipment are used in any activity, the activity must be a BBHC authorized function and must be conducted under either a contract with BBHC or an agreement whereby BBHC is reimbursed for facilities, staff or equipment used in conducting this activity.
- d. BBHC employees and staff should not advertise for consulting work using the name of BBHC.
- e. Any challenge by BBHC personnel of rulings by their immediate Supervisors on the substance or extent of their consulting should be made to the CEO of BBHC.

NETWORK PROVIDERS

BBHC's Network service providers must have procedures to disclose and resolve conflicts of interest.

REFERENCES:

ATTACHMENTS:

Conflict of Interest Questionnaire

DEFINITIONS:

REVISION/REVIEW LOG

	DATE
Added more verbiage to ensure the policy is more applicable to staff and not just to BBHC Board.	1/19/2018
Minor grammatical changes	9/25/2020
Added Conflict of Interest Questionnaire	7/23/2021
Added verbiage regarding network providers' need for Conflict of Interest Procedures	9/15/2021
No change	7/21/2022
Changed Director of Administration to Managing Director of Administration	7/24/2023

The Managing Director of Administration and Chief Executive Officer are responsible for all content in this policy.

Conflict of Interest Questionnaire

(Title of Solicitation/Contract)

- | | YES | NO |
|--|--------------------------|--------------------------|
| 1. Do you, your immediate family, or business partner have financial or
other interests in any potential vendor? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have gratuities, favors, or anything of monetary value been offered to
you or accepted by you from any potential vendor? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you been employed by any potential vendor within the last 24 months? . | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Do you plan to obtain a financial interest, e.g., stock, in any
potential vendor? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do you plan to seek or accept future employment with any potential vendor? . | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Do you have any other conditions which may cause a conflict of interest? | <input type="checkbox"/> | <input type="checkbox"/> |

If you answered "yes" to any of the above questions, please provide a written explanation of your answer below.

I declare all of the above questions are answered truthfully and to the best of my knowledge.

Name (type or print)

Signature

Date