



Conflict of Interest Appendix A: Definitions

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Scope:

Prisma Health-Midlands		Prisma Health-Upstate	
X	Prisma Health Baptist Hospital	X	Prisma Health Greenville Memorial Hospital
X	Prisma Health Baptist Parkridge Hospital	X	Prisma Health Greer Memorial Hospital
X	Prisma Health Richland Hospital	X	Prisma Health Hillcrest Hospital
X	Prisma Health Tuomey Hospital	X	Prisma Health Laurens County Hospital
X	Prisma Health Children’s Hospital-Midlands	X	Prisma Health Oconee Memorial Hospital
X	Prisma Health Heart Hospital	X	Prisma Health North Greenville Hospital
X	PH USC Medical Group	X	Prisma Health Patewood Hospital
X	Provider based facilities associated with Prisma Health-Midlands hospitals	X	Prisma Health Surgery Center - Spartanburg
		X	Prisma Health Marshall I. Pickens Hospital
		X	Prisma Health Children's Hospital-Upstate
		X	Prisma Health Roger C. Peace Hospital
		X	Prisma Health Baptist Easley Hospital
		X	University Medical Group UMG/PIH
		X	Provider based facilities associated with Prisma Health-Upstate hospitals

Associated Policies:

Conflict of Interest Annual Disclosure Requirement (S-015-03)

Content:

This Appendix provides definitions that apply to the Prisma Health Conflict of Interest Policy and should be referenced therein.

Responsible Positions:

Prisma Health employed medical staff, team member

Definitions:

1. **Affiliate**
Any organization that is directly or indirectly controlled by Prisma Health
2. **Conflict of Interest**
Due to activities or relationships with other persons or organizations, an individual is unable or potentially unable, to remain impartial, that the individual’s objectivity is, or might be otherwise impaired, or that the individual has, or might acquire, an unfair competitive advantage.

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Information that is relevant to a conflict of interest determination includes stock holdings and investments of the individual, and/or the individual's family member or significant other; current positions held or under negotiation; any other sources of income; involvement in the design, conduct, or reporting of research and any other relevant information that may have a bearing on the individual's proposed participation in such activity.

For members of the Prisma Health employed medical staff this also includes any (1) contractual, employment, or Financial Interest with a non-affiliated hospital or other Health Care Organization that competes with Prisma Health or any Affiliate or (2) service in a position of strategic or medical direction leadership in any such non-affiliated hospital or other Health Care Organization, provided, however, that membership on another health care provider's medical staff or as a member of a group practice shall not be considered as a Conflict of Interest; or (3) a compensation arrangement, including the provision of travel accommodations and/or entertainment, from a third-party vendor in exchange for promotion or sponsorship of that vendor's products or services.

3. Compensation

Compensation includes but is not limited to direct and indirect remuneration.

4. Discloser

An individual disclosing a Financial Conflict of Interest.

5. Family Member

A Family Member is an individual who is the spouse, parent, brother, sister, child, mother-in-law, father-in-law, son-in-law, daughter-in-law, grandparent, or grandchild of a person, or an individual claimed by a person or the person's spouse as a dependent for income tax purposes.

6. Financial Conflict of Interest (FCOI)

A significant financial interest that could directly and significantly affect the design, conduct, or reporting of Public Health Service (PHS) – funded research.

7. Financial Interest

Anything of monetary value, whether or not the value is readily ascertainable (e.g., salary, consulting fees, honoraria, gifts, dividends, distributions, rent, paid authorship, equity interests, intellectual property rights, etc.).

A person has a Financial Interest if the person or Family Member has, directly or indirectly through business, investment (excluding investments held in mutual funds), such as:

- 7.1. An ownership or investment in any entity with which Prisma Health employed medical staff, team member has a transaction or agreement,
- 7.2. A Compensation arrangement with Prisma Health employed medical staff, team member or (excluding Compensation as a Prisma Health employed medical staff, team member or Medical Group employee) or with any entity with which Prisma Health employed medical staff, team member has a transaction or arrangement,
- 7.3. A potential ownership or investment interest in, or Compensation arrangement with, any entity or individual with which Prisma Health employed medical staff, team member is negotiating a transaction or arrangement, or
- 7.4. An economic interest distinct from that of the general public in any transaction or arrangement of an amount set forth in the Prisma Health Business Ethics and Conduct policy.

A Financial Interest is not necessarily a conflict of interest.

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An interest in a business consists of: (1) any stock, stock option or similar ownership interest in such Business, but excluding any interest arising solely by reason of investment in such Business by a mutual pension, or other Prisma Health employed medical staff, team member investment fund over which the faculty member does not exercise control; or (2) receipt of, or the right or expectation to receive, any income from such Business (or from an agent or other representative of such business), whether in the form of a fee (e.g., consulting), salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty derived from the licensing of technology, technology transfer, patents, gifts, rent, capital gain, real or personal property, or any other form of Compensation, or any combination thereof whose value exceeds \$5,000.

8. Prisma Health Conflict of Interest Committee(s)

The Committee(s) will be comprised of the Chief of Medical Staff Affairs, the Vice President of Corporate Integrity, Medical Director Leadership, Deputy General Counsel, Corporate Compliance Officer, and the Institutional Official and other Leaders from each market/affiliate as deem necessary.

9. Prisma Health Leadership

For purposes of this policy, "Prisma Health Management" means any and all Prisma Health Executive Officer(s), any vice president, administrator, and department director.

10. Health Care Organization

Any entity engaged in the business of providing health care services including, but not limited to, imaging, diagnostic, physical or occupational therapy, infusion and ambulatory surgery centers, laboratories, and home health agencies.

11. Interested Person

An Interested Person means any member of Prisma Health employed medical staff, team member or that has a Financial Interest (as defined above) and is duly authorized to conduct business or influence business decisions on behalf of Prisma Health (and all entities affiliated with Prisma Health) or on behalf of any entity with which Prisma Health may do business. Financial Interests of a Family Member (as defined above) are considered to be the same as that of the Interested Person.

12. Institutional Responsibilities

Institutional Responsibilities, including the Investigator's professional responsibilities on behalf of the Prisma Health and as defined by Prisma Health in its policy on Financial Conflict of Interest, which may include, for example, activities such as research, research consultation, teaching, professional practice, Prisma Health committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards

Prisma Health will provide, or cause to be provided, education for appropriate employees and staff about disclosures and responsibilities related to Financial Conflict of Interest CITI training?

12.1. Education is required prior to a possible FCOI and at least every four years and thereafter.

12.2. Education is required immediately when:

12.2.1. Financial Conflict of Interest policies are revised in a manner that changes Investigator requirements.

12.2.2. An Investigator is new to the organization.

12.2.3. An Investigator is non-compliant with FCOI policies and procedures.

13. Investigator

A principal Investigator, project director, co-Investigator and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research (project) results, including collaborators and consultants.

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14. Key Personnel

Project Director or Principal Investigator and any other person identified as senior/key personnel by Prisma Health employed medical staff, team member or Medical Group in the grant application, progress report, or any other report submitted to the Public Health Service (PHS) by Prisma Health.

15. Medical Staff Committee

Any committee or task force that has been created at the direction of the organized medical staff of Prisma Health

16. Research

A systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g. a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).

17. Public Health Service (PHS)

PHS refers to the Public Health Service of the U.S. Department of Health and Human Services (DHHS), and any components of the PHS to which the authority involved may be delegated, including the National Institute of Health (NIH).

18. Significant Financial Interest

18.1. A Financial Interest held by an individual or his/her spouse or dependent children that reasonably appears to be related to the individual's Institutional Responsibilities and that consists of one or more of the following:

- 18.1.1. Remuneration including, but not limited to salary, consulting fees, honoraria, and paid authorship received from a publicly traded company during the twelve-month period preceding the date on which an Investigator is making a disclosure, and/or an equity interest (e.g. stock, stock options, or other ownership interest) held in such publicly traded company, if the aggregate value of such remuneration, plus the value of the equity interest as of the date of disclosure, exceeds \$5,000; or
- 18.1.2. Any equity interest in a non-publicly traded company or business, regardless of value; or
- 18.1.3. Intellectual property rights and interests (e.g. patents and copyrights), upon receipt of income related to such rights and interests; or
- 18.1.4. Any reimbursed travel or travel expenses paid on an Investigator's behalf related to his/her Prisma Health employed medical staff, team member responsibilities, including circumstances when the exact monetary value of the travel is not readily available. This requirement does not apply to travel that is reimbursed by a Federal, state or local government, an Institution of higher education, an academic medical center or research institute (including Prisma Health) that is affiliated with an Institution of higher education.

19. Significant Financial Interest does not include:

- 19.1. An Employee's salary or royalties received from Prisma Health; or
- 19.2. Income from seminars, lectures or teaching engagements sponsored by a federal, state or local government agency or an Institution of higher education; or
- 19.3. Income from service on panels for a federal, state or local government agency or Institution of higher education.

An Investigator's Significant Financial Interest is related to PHS-funded research when the Institution, through its designated official(s), reasonably determines that the Significant

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Financial Interest could be affected by the PHS-funded research; or is in an entity whose Financial Interest could be affected by the research.

20. Significant Organizational Conflict of Interest

A Significant Organizational Conflict of Interest may exist when Prisma Health employed medical staff, team member has a Financial Interest that could cause a conflict with clinical care. Organizational conflicts of interest may include Prisma Health employed medical staff, team member interest in the following:

- 20.1. Licensing, technology transfer, and patents, when Prisma Health employed medical staff, team member owns the intellectual property
- 20.2. Investments of Prisma Health employed medical staff, team member, in excess of \$500,000
- 20.3. Gifts, when the donor has an interest in the research in excess of \$500,000
- 20.4. Financial Interests of senior leadership in excess of \$250,000
- 20.5. Other Financial Interests that are determined to be a conflict of interest