

XXXX Agency
CAP/C Case Management Policy and Procedures

Policy Number:

Subject: Conflict of Interest

I. PURPOSE

To ensure that all agency personnel avoid conflicts of interest within the performance of duties for the agency.

II. POLICY

The affairs of the agency will be conducted in accordance with the highest standards of integrity. There can be no deviation from complete honesty on business transactions. Use of internal business information for improper purposes and dishonest practices is absolutely forbidden.

III. PROCEDURE

Procedure

1. All personnel act in the course of their duties solely in the best interests of the agency without consideration to the interests of any other agency, organization, or association with which they are associated and to refrain from taking part in any transaction where such person(s) do not believe in good faith that they can act with undivided loyalty to the agency.
2. All personnel will disclose any material, financial, or other beneficial interest to any entity engaged in the delivery of goods or services to the agency or its members.
3. All personnel will disclose any transactions with the agency which would result in any benefit to themselves, their immediate family/caregivers, or any entity in which they hold a significant financial ownership or other interests, and refrain from participation in any action on such matters except upon approval of XXX after full and frank disclosure.
4. All personnel will refrain from utilizing any inside information as to the business activities of the agency for the benefit of themselves, their immediate families or any entity with which they may be associated.
5. During the orientation process, all personnel are required to sign an employment agreement which includes statements related to confidentiality, non-competition, and return of records, papers, or equipment.
6. All personnel will agree to devote his/her best efforts to the company and not directly or indirectly be engaged in or connected with any other commercial pursuits whatsoever without written authorization from the agency.
7. In the event a situation arises whereby agency personnel could use confidential or privileged agency information to personal gain, he/she is obligated to report that potential to the XXX.

Effective Date	Revision Date	Reviewed By

SAMPLE