



Behavioral Health Services

**CONFLICT OF INTEREST STATEMENT**  
**For**  
**REGION 3 REGIONAL GOVERNING BOARD MEMBERS**  
**And**  
**REGION 3 BEHAVIORAL HEALTH ADVISORY COMMITTEE MEMBERS**

It is the duty of members of the Region 3 Behavioral Health Services Regional Governing Board (RGB) and members of the Behavioral Health Advisory Committee (BHAC) to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of a conflict of interest. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest.

Definition of Conflict of Interest

A conflict of interest may exist when an organizational matter to be acted upon confers a personal benefit, financial or otherwise, direct or indirect, to a member of the RGB, member of the BHAC, a person related by kinship, or a personal or professional association.

RGB Members and BHAC Members Conflicts of Interest Includes:

1. Any duality of interest or possible conflict of interest on the part of any RGB or BHAC member should be disclosed to the other RGB or BHAC members and made a matter of record, either through an annual procedure or when the interest becomes a matter of action.
2. Any RGB or BHAC member having a duality of interest or possible conflict of interest concerning any matter should not vote or use his/her personal influence concerning the matter. He/she should not be counted in determining the quorum for the meeting, even where permitted by law. The minutes shall reflect that a disclosure was made, the abstention from voting, and the quorum situation.
3. The foregoing requirements should not both be construed as preventing the RGB or BHAC member from briefly stating his/her position in the matter, nor from answering pertinent questions of other RGB or BHAC members since his/her knowledge may be of great assistance.
4. RGB and BHAC members are not to misuse confidential information or use it for their own advantage.
5. RGB and BHAC members may not use Region 3 Behavioral Health Services' employees, volunteers, resources, property, or funds for personal financial gain.
6. RGB and BHAC members may not use or attempt to use any official position to secure unwarranted privileges or exemptions for themselves or others.
7. RGB and BHAC members may not accept benefits of any nature which directly result from affiliation with Region 3 and/or use Region 3 intellectual property.

Reporting Allegations and Resolutions of Conflicts of Interest

All members of the RGB and BHAC have a duty to recognize and disclose activities that might give rise to conflicts of interest, or the perception of conflicts, to ensure that such conflicts are properly managed or avoided and that further steps, as detailed below, are taken as necessary.

Conflicts of interest disclosed within Region 3:

Self-Disclosure: Many situations may require nothing more than a declaration and a brief written record of that declaration, of which shall be maintained by Region 3. Conflicts of Interest Statements are signed as new members join and annually by members of the RGB and BHAC.

Reporting of Allegations and Resolution Process: When there is an allegation of a conflict of interest:

1. The person/entity is required to complete an Incident Report provided by Region 3. The Incident Report shall be processed through Region 3's Compliance Program.
2. The Incident Report and recommended resolution is required to be presented to the RGB Executive Committee for discussion prior to the full RGB's review and subsequent action.
3. The RGB will review all relevant information available to them regarding the alleged conflict of interest and take the appropriate action under the circumstances which would include, but not limited to the following:
  - a) Make a determination that a conflict of interest does not exist and provide reasons in writing to all interested parties. No further action is required.
  - b) Make a determination that additional information is required, continue the matter for further consideration, and take action as appropriate to acquire the additional information.
  - c) Make a determination that a conflict does exist and refer the matter to a neutral entity for resolution. That entity may include, but not be limited to, the Director of the Division of Behavioral Health.
  - d) With the agreement of all interested parties, refer the matter to mediation in order to facilitate a resolution. If the parties are not able to successfully mediate said matter, referral will be made to a neutral entity as set forth in provision 3 above.

Failure to Disclose Actual or Possible Conflicts of Interest

If it is determined that a member of the RGB or BHAC has failed to disclose actual or possible conflicts of interest, an investigation will occur and appropriate corrective action will occur, if necessary.

I, Understand, hereby affirm that I shall disclose any conflicts of interest and any association with any party that may be perceived to be a conflict of interest, when asked to vote on a decision that involves any other third party to whom Region 3 conducts business with when a conflict of interest exists, or when a perceived conflict of interest exists. After any such disclosure by me, I shall abstain from voting on the issue at hand. The declaration and the abstention shall be noted in the meeting minutes.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

Check All That Apply:

RGB Member \_\_\_\_\_

BHAC Member \_\_\_\_\_

\_\_\_\_\_  
Date

Reviewed/Revised:

1/24/20