

STANDARD OPERATING PROCEDURES (SOP)

Conflict of Interest

STATEMENT OF INTENT

The purpose of the conflict of interest procedure is to exercise reasonable care in oversight of the interests of the Texas Trauma Coordinators Forum (TTCF) as a 501(c)3 organization when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of or might result in possible excess benefit transaction and to minimize ethical dilemmas.

This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

DEFINITIONS:

TTCF recognizes that its members have significant professional, business and personal interests and relationships. Therefore, TTCF has determined that the most appropriate manner in which to address actual, potential, or apparent conflicts of interest is initially through liberal disclosure of any relationship or interest which might be construed as resulting in such a conflict. Disclosure under this Conflict of Interest Procedure should not be construed as creating a presumption of impropriety or as automatically precluding someone from participating in a TTCF activity or decision-making process. Rather, it reflects TTCF's recognition of the many factors that can influence one's judgment, and a desire to make as much information as possible available to other participants in TTCF-related matters to allow them to properly weigh/address the interests of others and, as necessary, to implement a plan to properly manage conflicts.

PROCEDURE

- I. All members of the Board of Directors involved in a decision-making process on behalf of TTCF (collectively, "Covered Persons") are to act at all times solely in the best interest of TTCF and to fully disclose any personal, professional or business interests that conflict, potentially conflict or appear to conflict, directly or indirectly, with the affected activity or decision. Conflicting interests may relate to TTCF's programs and services (e.g., educational courses) or its operations (e.g., contracts with third parties.)
- II. Covered Persons may not use their position for individual advantage or for the advantage of a relative or business associate.
- III. Covered Persons are obligated to disclose the positions they hold or relationships they have with other organizations or entities that may conflict, directly or indirectly, with their TTCF activities. They must also disclose any significant financial interest in, or other relationship with, an entity having a "commercial

interest” in the outcome of the decision. A commercial interest may exist not only where the entity’s products or services are under consideration by TTCF but also where the entity’s products or services are in competition or potential competition with those under consideration. By the disclosure of such interests, other participants will have the opportunity to take potential biases into consideration. In addition, the Board of Directors will be in a better position to determine whether the participant may have an interest in conflict with the interests of TTCF that requires further management, beyond mere disclosure.

- IV. To help assure full disclosure of any actual or potential conflicts of interest, all Covered Persons must comply with this Procedure and annually sign and submit a disclosure form (a copy of which is attached hereto) (“Disclosure Statement”) (i) acknowledging that he or she is aware of and has read the Procedure; and (ii) disclosing the information described above. If, subsequent to any such annual disclosure (but prior to execution of a new annual disclosure form), a Covered Person becomes aware of a relationship required to be so disclosed, such Covered Person shall promptly make the required disclosure by submitting a revised Disclosure Statement identifying the organization, business, group, entity, etc. and describing the nature of the relationship.
- V. The signed disclosure statement must be submitted to the TTCF Secretary prior to the first calendar year meeting of TTCF General Membership.
- VI. The Executive Board will review all volunteer disclosure statements in which a conflict is disclosed and consult with others in confidence as needed and appropriate, to determine whether any conflicts exist and recommend appropriate action to the Board of Directors as applicable.
- VII. Persons who fail to disclose a conflict (or potential conflict of interest) in accordance with this Policy may be subject to disciplinary action, including dismissal from office or appointment.

Authors:
Parliamentarian

Date:
February 2020 - Written

Disclosure Statements are generally confidential but may be disclosed as necessary to protect the interests of TTCF and may not be used by any TTCF member for his or her benefit.

CONFLICT OF INTEREST DISCLOSURE STATEMENT

Instructions for completing the questionnaire:

1. Read the attached TTCF Conflict of Interest Procedure before completing this Disclosure Statement.
2. The terms “family relationship” and “immediate family” as used herein, refer to any parent, spouse, domestic partner, or child.
3. The term “affiliate” means any organization that directly or indirectly through one or more intermediaries, controls or is controlled by, or is under common control with the organization.
4. If any item is inapplicable, answer “none” or “n/a” as appropriate.
5. If additional space is needed for answering a question, please attach an additional sheet and indicate the number of the question, which is being answered.
6. After completing the questionnaire, sign, date, and return it to the TTCF Secretary prior to the first calendar year meeting of TTCF General Membership.

Conflict of Interest Disclosure Statement

I. NAME AND BACKGROUND INFORMATION

A. Name: _____

Address: _____

Position with TTCF: _____

B. I hereby state that I or members of my immediate family have the following affiliations or interests and have taken part in the following transactions that, when considered in conjunction with my position with or relation to the Texas Trauma Coordinators Forum (TTCF), might possibly constitute a conflict of interest.

II. OUTSIDE INTERESTS

Identify any position held by yourself or a member of your immediate family in any outside concern from which TTCF secures goods or services or that provides services competitive with TTCF.

(_____) None

III. INVESTMENTS

List and describe, with respect to yourself or a member of your immediate family, all investments that might be considered a "material financial interest", as described below:

- A. Capital stock, obligations, or a combination of both, of any concern the capital stock or obligation of which are listed on any nationally recognized securities exchange, having an aggregate value in excess of \$500,000; or
- B. Any interest in any other outside concern, with the exception of the holding of indebtedness; or
- C. Holding of indebtedness of any outside concern, other than those mentioned in subparagraph A above, in any amount in excess of \$100,000.

(_____) None

IV. OUTSIDE ACTIVITIES

List any other activities in which you or your immediate family are engaged that might be regarded as constituting a conflict of interest, giving particular attention to activities rendered as a director, manager, consultant or employee of any outside concern that does business with or competes with TTCF, and to activities

in which it would be possible to disclose or use information relating to TTCF for your advantage or of that of a member of your immediate family.

(____) None

V. GIFTS, GRATUITIES AND ENTERTAINMENT

List and describe any gifts, gratuities, or entertainment that you or members of your immediate family have received from any person or outside concern that does business, hopes to do business, or competes with TTCF. (If you have received such benefits, please approximate their value. Do not list gifts or entertainment of nominal value.)

(____) None

ACKNOWLEDGEMENT AND SIGNATURE

I hereby agree to report to the President any changes in the response to each of the foregoing questions which may result from changes in circumstances before completion of my next Conflict of Interest Disclosure Statement.

I have read, understand, and agree to the terms of Texas Trauma Coordinators Forum's Conflict of Interest Procedure. To the best of my knowledge and belief, the information reported above is complete and accurate, and I am not aware of any other personal or professional position(s) or interest(s) or activities in which I am, or am about to be, engaged that reasonably may be anticipated to conflict with the interests of TTCF.

Signature: _____

Position: _____

Date: _____