



## **Puerto Rico School of Nurse Anesthetists**

### **Employee and Faculty Policy on Conflicts of Interest**

#### **Purpose of Policy**

The purpose of this policy is to establish guidelines for Academic Conflict of Interest and Conflict of Commitment.

#### **Scope of this Policy**

This policy applies to all faculty members of PRSNA.

#### **Policy**

It is necessary that employees seek to avoid Conflicts of Interest. It is important to understand that a “Conflict of Interest” is any situation in which the personal, professional, financial, or other interests of an employee may potentially or actually diverge from, or may be reasonably perceived as potentially or actually diverging from, his or her obligations to PRSNA. This includes indirect conflicts, such as benefits provided to an Immediate Family Member of an employee.

An employee must disclose any Conflict of Interest and should anticipate the possibility of a Conflict of Interest whenever possible so that the possible Conflict of Interest can be reviewed prior to occurrence. An employee must cooperate with any plan adopted by PRSNA to manage, reduce, or eliminate the Conflict of Interest. Where an employee is not initially aware of the Conflict of Interest but becomes aware of it at a later time, the individual should disclose the Conflict of Interest promptly upon learning of it.

This policy applies to any circumstance that may constitute a Conflict of Interest.

The following is a list of the types of Conflicts of Interest that may arise:

- **Business Arrangements.** Participating, directly or indirectly, in the selection, approval, facilitation, or administration of any business arrangement involving PRSNA and an Immediate Family Member of an employee in which the employee or Immediate Family Member holds a financial interest or has an employment.
- **Competing with PRSNA.** Engaging, directly or indirectly, in activities that are in competition with PRSNA. This includes (1) holding, directly or indirectly, an ownership or other financial interest or having an employment, management, or a leadership role in an enterprise that is a competitor of PRSNA; and (2)

appropriating or diverting a business or financial opportunity that an employee knows or should know PRSNA is pursuing or is considering pursuing or reasonably might be interested in pursuing if it were aware of the opportunity.

- **Gifts.** Accepting any gift or favor that is illegal under applicable law or prohibited under other applicable PRSNA policies. Also, accepting gifts or loans from any person or entity seeking a benefit from PRSNA. Where it is impracticable for the employee (or his or her Immediate Family Member) to decline a gift that would otherwise constitute a Conflict of Interest under this policy, and where it is neither illegal nor unethical for PRSNA itself to accept the gift, the individual may accept the gift on behalf of PRSNA with the permission of his or her supervisor and then transfer it to PRSNA.
- **Improper Use of PRSNA Resources.** Unauthorized use of PRSNA resources, including the services of University employees, for personal purposes.
- **Confidential Information.** Obtaining, using, or disclosing PRSNA Confidential Information for direct or indirect personal interest, profit, or advantage; obtaining or using PRSNA Confidential Information for a purpose that may be detrimental to PRSNA; or disclosing PRSNA Confidential Information to a person or entity that is not authorized by PRSNA to receive it.
- **Compliance with PRSNA Policies.** Failure to comply with applicable PRSNA policies.