




National University of Health Sciences General Policies

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		8-7-09		
President	Date			

POLICY STATEMENT

It is the policy of National University of Health Sciences (NUHS) that no employee accept any unapproved cash, gifts or reimbursement from any person or organization with whom the employee does business or is negotiating to do business on behalf of NUHS.

A conflict of interest exists when any individual covered by this policy has a relationship with a person or organization or engages in an activity that could reasonably be expected to impair or adversely influence his/her judgment with respect to the performance of job duties or promoting the best interests of the University. This includes, but is not limited to, all situations where a person benefits financially, either directly or indirectly, from his/her employment or appointment by NUHS, other than compensation and financial benefits paid or granted by the University.

This policy is not intended to prohibit ethical and traditional functions related to University business, such as lunches, or to preclude the receiving of token mementos of nominal value. Gifts of \$50 or less may be accepted with the approval of the department manager. However, if there is any doubt as to the propriety of the gift or activity, then it should be rejected as contrary to policy. NUHS recognizes and approves of a close working business relationship between its employees and others, and it is expected that the relationship be built on integrity, respect and mutual confidence.

Disclosure of Confidential Information:

"Confidential information" includes information concerning NUHS operations, activities, business affairs or its employees, students, vendors and suppliers which is not readily accessible to the general public, and any other information which is private to the University, has not been released to the public and would not be in the best interest of the University if disclosed to competitors or others. It also includes material and information obtained or developed by an employee, either alone or in concert with other employees, as part of the employee's work assignment. Such information belongs to the University. Confidential information must not be disclosed to anyone in the University who does not have a business need to know or to anyone outside of the University, except in accordance with established University procedures. Unauthorized disclosure of confidential information is prohibited by the policy.

Improper Use of University Funds and Property:

Improper use of University funds and property includes, but is not limited to, forgery or alteration of University documents, misappropriation of student payments or other University assets, and irregularity in handling or reporting money transactions. False or artificial entries shall not be made in the records of the University for any reason. Such action can result in criminal and civil penalties to the University and its employees, as well as disciplinary action up to and including termination.

Fraud and Abuse Allegations:

Because we are acutely aware of the need for all employees to uphold the highest of standards of conduct when dealing with our patients and all agencies providing reimbursement to the University. The University will not tolerate any incident whereby a patient, federal, state or third party payors are misled, overcharged, incorrectly billed, duplicate billed or otherwise inappropriately handled in regards to financial matters with the University. Employees who believe there is fraud or abuse taking place should contact the Human Resources office immediately. Infractions of the standard of conduct will result in immediate investigation and may lead to disciplinary actions up to and including termination.

Full Disclosure Policy Affecting NUHS Faculty:

The University requests that all faculty members identify potential conflicts of interest that may have relevance to the subject matter of the current curriculum. Financial interest or other relationships include, but are not limited to, grants or research support, employment, consultant fees, major stock holdings or member of a company's speaker bureau.

The University has created its full disclosure policy to ensure that the student body is aware of potential faculty conflicts of interest. This allows students to form their own judgments regarding presentation of subject matter by faculty members with full disclosure of facts.

NUHS faculty members are asked to complete a 'Faculty Disclosure Declaration' and their disclosures, if any, are to be retained by the immediate supervisor. The disclosure(s) listed acknowledges that the faculty member has received corporate financial support or that he/she has a financial interest or other relationship relevant to the subject matter covered in that faculty member's course. The 'Faculty Disclosure Declaration' must be updated annually at the start of each fiscal year.

