

## National POLST Paradigm Conflict of Interest Policy

**Guiding Principle:** The National POLST Paradigm may accept gifts, engage with, and accept support from any entity committed to the Paradigm’s mission<sup>i</sup>, vision<sup>ii</sup> and essential values<sup>iii</sup> and the core programmatic objectives articulated in the Paradigm’s strategic framework. The National POLST Paradigm will not enter any engagement that compromises its integrity, violates any federal, state or local law, is financially unsound, could expose the National POLST Paradigm to unacceptable liability or other adverse consequences, or is contrary to the goals of the National POLST Paradigm.

### Definitions:

- “Engagement” includes acceptance of: grants; contracts and other transactions that provide for mutual legal obligations; and donations, including money, property, in-kind contributions and all other kinds of support. Engagement also includes strategic partnerships, sponsor recognition, product certification or endorsement, and cause marketing. Engagement does not include routine commercial transactions with vendors or the sale of goods in the open market, nor collaborating with other entities to respond to a legislative or regulatory issue. If there are doubts about whether a relationship would be covered by this policy, the question should be referred to the Leadership Council President and the Executive Director at the earliest possible opportunity.
- “Entity” means an individual, a corporation, a business trust, a trust, a partnership, an association, a government, a governmental subdivision or agency or any other legal entity.

**Review of engagement opportunities:** The Leadership Council is responsible for protecting the National POLST Paradigm and approving all engagement opportunities. The Leadership Council may authorize in advance some categories of engagement but will otherwise approve all other engagement opportunities on a case-by-case basis; the Leadership Council Governance Committee will review and approve engagement opportunities on the full Leadership Council’s behalf.

If a proposed engagement involves an entity that is:

1. for-profit commercial health care related entity or controlled by such entity; or
2. whose primary purpose is to represent such entities; or
3. a board member perceives a conflict of interest or potential adverse consequences to a proposed engagement,

then approval by two-thirds of the Leadership Council is required. Any such proposed engagement must first be discussed at a Leadership Council meeting.

The Leadership Council President and Executive Director will (i) review all engagement opportunities using the assessment below before submitting engagement opportunities for approval as described above and (ii) for those engagements approved, report on them annually to the Leadership Council.

Employees and other persons acting on behalf of the National POLST Paradigm are expected to inform the Leadership Council President and the Executive Director before initiating or responding to an engagement opportunity to provide full and complete information so that the engagement opportunity can be properly assessed.

**Assessment of engagement opportunities:** The following factors will guide the review of engagements:

- The nature of the engagement, including fiscal and programmatic control, level of investment, reasonability of conditions or restrictions, and any unusual financial or legal risks.
- The extent to which the engagement is likely to support and advance the Guiding Principle stated above, provide support for important programs and, if applicable, lead to a significant, productive relationship.



- The extent to which the engagement is likely to affect the independence, reputation, or integrity of the entire National POLST Paradigm and the availability of methods to reduce the risk of any adverse impact.

---

<sup>i</sup> Mission: Advance the POLST Paradigm through stewardship, education, advocacy, support for state efforts, and national leadership.

<sup>ii</sup> Vision: Our vision is to have all states adopt the POLST Paradigm, resulting in a consistency of process, improved patient care and greater patient control and direction over medical treatment.

<sup>iii</sup> Values: <http://polst.org/wp-content/uploads/2017/02/2017.02.10-POLST-Public-Policy-Principles.pdf>