Individual Conflict of Interest and Conflict of Commitment Update

March 12, 2014

John Zink
Chief Risk & Compliance Officer
Conflict of Interest compliance

• As of March 11 – 2,649 submissions have been completed. 683 remain outstanding. (80% compliance)

• 159 employees have indicated that a conflict *may* exist.
  ➢ 62 conflicts identified.
  ➢ 55 management plans have been completed.
  ➢ 67 needing follow up (no determination made to date).
  ➢ 46 individuals referred to VP Research Office for PHS COI review
    – One conflict identified. Conflict eliminated.