

Conflict of Interest at Edward-Elmhurst Health Frequently Asked Questions

1. What browser do I need to use to access COI Smart?

- Chrome
- Internet Explorer Version 11 or higher
- Firefox

2. How often do I need to complete a conflict of interest questionnaire?

Interested Persons are required to complete an annual conflict of interest questionnaire. The responses to that questionnaire are considered valid until the next questionnaire is submitted unless the responses are updated.

3. What time period does the questionnaire cover?

The responses given should be effective as of the date and time you are responding. They should be updated if they change before the next questionnaire is completed.

4. What do I do if one of my responses changes?

If you need to change one of your responses, you should log back in to COI Smart to change the response. You can log in at any time. Additionally, you will receive a periodic email reminding you to login to update your responses. That email will have a link that you can follow.

5. What should I do with the reminder email if I have no changes to my responses to the questionnaire?

If you have no changes to your responses, you may delete the email.

6. How do I revise a response?

- a) Log in to COI Smart.
- b) Select “Click Here to Access Your Questionnaire”
- c) Click the “Submitted” text
- d) Click “Revise” in the Action column next to the response that you wish to change
- e) Select “Continue to the Question Revision Submission Page”
- f) Type “revise” and click “Submit Revision to This Question” to save your revised response
- g) You may then revise another question, log off or return to the questionnaire list

7. What dollar limit is considered a gift by a single entity (e.g., meals)?

EEH employees may accept gifts of a reasonable value from any individual or organization who has a stable business relationship with EEH. For purposes of this paragraph, physicians practicing in EEH facilities are considered to have such a relationship. Any questions regarding the reasonableness of a gift or business courtesy should be directed to an employee’s supervisor or the Compliance Department. It is critical to avoid the appearance of impropriety when receiving gifts from individuals who do business or are seeking to do business with EEH. We will never accept gifts or other incentives to improperly influence relationships or business outcomes. A prime example of this is that we will not accept gifts or other courtesies from outside business associates who are actively bidding to provide goods or services to EEH.

8. What does EEH do with Open Payments data?

EEH will compare disclosures made with the most recent Open Payments data realizing that there may be discrepancies because of the time lag. If significant differences are noted when comparing your disclosures to the Open Payments data, you may be asked to explain the differences or to update your disclosures.

9. What is Open Payments?

Open Payments is a national disclosure program created by the Affordable Care Act that increases public awareness of financial relationships between the health care industry (like medical device manufacturers and pharmaceutical companies) and physicians or teaching hospitals. Drug, device, biological, and medical supply manufacturers are required to report payments or transfers of value they make to physicians or teaching hospitals, and the Centers for Medicare & Medicaid Services (CMS) collects this data annually, and makes it publicly available and searchable online at [cms.gov/openpayments](https://www.cms.gov/openpayments).

10. What if I disagree with the Open Payments data?

You can dispute the data. Instructions for disputing the data can be found in the “Review and Dispute Process – Quick Reference Guide”

<https://www.cms.gov/OpenPayments/Program-Participants/Physicians-and-Teaching-Hospitals/Resources-phys-th.html>

11. Who are Interested Persons?

Interested Persons include:

- a. all members of the Board of Trustees and all officers of EEH;
- b. all members of the EEH Management Team or Management Council;
- c. all Providers who are compensated by EEH as employees, including but not limited to physicians who have been retained or employed as Medical Directors or Medical Advisors;
- d. all Professional Services Agreement Providers;
- e. members of the Pharmaceutical and Therapeutics Committee;
- f. department chairs and medical directors;
- g. or certain other physicians identified by senior management as potentially having a conflict;
- h. the Edward Hospital and Elmhurst Memorial Hospital Medical Staff Presidents;
- i. those employees and agents of EEH and each affiliate which are so designated by the President/CEO of that affiliate;
- j. any EEH employee who has a Financial Interest, at such time when that Financial Interest arises.

12. What is my username and password?

If you are an employee or a provider with Elmhurst Clinic or Elmhurst Medical Associates your username and password are your network login and password.

If you are not an employee, your username is the email address you provided and your password is the password that you selected.