

Conflict of Interest and Professional Conduct Policy

Mesabi Behavioral Health Network

Adopted by the Board on July 13, 2026

1. Purpose

This policy ensures that all members act in the best interests of the network and the communities it serves. It is designed to:

- Prevent financial or personal interests from influencing decisions
- Promote transparency and trust across the network
- Ensure that shared spaces are used for collaboration—not promotion or sales
- Protect the integrity and reputation of the network

2. Scope

This policy applies to all:

- Participating providers, agencies, and network members
- Staff
- Governance board members

(collectively, “Members”)

3. Core Principles

Members are expected to:

- Act in the best interest of the network as a whole
- Share information for educational and collaborative purposes only
- Avoid using network participation to market, promote, or sell services
- Disclose and appropriately manage any real or perceived conflicts

4. Conflict of Interest Defined

A conflict of interest exists when a Member's personal, financial, or organizational interests:

- Could influence their judgment or decision-making, or
- Could reasonably appear to influence their objectivity

5. Prohibition on Marketing and Solicitation

To preserve trust and neutrality:

Members may NOT:

- Promote, advertise, or "sell" their own services during meetings, trainings, or network communications
- Use case discussions, referrals, or shared resources to steer business toward themselves or their organization
- Distribute marketing materials unless explicitly authorized by the network for a neutral purpose
- Scrape MBHN lists or invitations for email addresses

Members MAY:

- Share general information about services when relevant and requested
- Participate in structured directories or referral lists maintained by the network
- Provide educational content that is not promotional in nature
- Share service openings during agency updates in order to best serve community and reduce wait lists region wide

Guiding Rule:

If the intent is to gain business rather than share knowledge, the activity is not permitted.

6. Examples of Conflicts

Conflicts may arise when a Member:

- Refers clients primarily to their own organization when alternatives exist
- Participates in decisions that could financially benefit their employer or practice
- Promotes their services during network events or communications

- Has financial relationships with vendors or partners used by the network
- Competes for the same funding or contracts as the network

If uncertain, disclosure is required.

7. Disclosure Requirements

Members must:

- Disclose any actual or potential conflicts as soon as they arise
- Complete an annual disclosure form
- Update disclosures if circumstances change

Disclosures should include:

- Financial interests or ownership
- Employment or leadership roles in other organizations
- Any situation where personal benefit could intersect with network decisions

8. Review and Determination

A designated committee (e.g., Governance Board):

- Reviews disclosures
- Determines whether a conflict exists
- Recommends appropriate actions

The Member with the conflict:

- Must not participate in discussion, decision-making, or influence
- May be asked to provide factual information only

9. Managing Conflicts

When a conflict is identified, the network may:

- Require recusal from decisions or discussions
- Limit participation in certain activities
- Prohibit specific actions (e.g., referrals tied to financial gain)

- In serious cases, restrict or terminate membership

10. Compensation and Financial Decisions

Members may not:

- Participate in decisions about their own compensation or financial benefit
- Influence decisions that affect their organization financially

All compensation decisions must be:

- Fair and reasonable
- Based on objective benchmarks
- Documented and approved by non-conflicted parties

11. Documentation

The network will document:

- Disclosures and determinations
- Actions taken to manage conflicts
- Any decisions involving potential financial benefit

12. Accountability

Violations of this policy may result in:

- Removal from discussions or committees
- Loss of participation privileges
- Termination of membership or role

13. Acknowledgment

All Members must sign an annual statement confirming that they:

- Have read and understand this policy
- Agree to comply
- Have disclosed any relevant conflicts

Disclosure Statement

I certify that:

- I have read and agree to follow the Conflict of Interest and Professional Conduct Policy
- I will not use my participation in the network to market or sell services
- I have disclosed all relevant financial, professional, or personal interests

Disclosures (if any):

Name: _____

Role: _____

Signature: _____

Date: _____