

**IDAHO HEALTH UNDERWRITERS POLITICAL ACTION COMMITTEE
POLICY & PROCEDURE**

POLICY TITLE:	Conflict of Interest
CLASSIFICATION:	IHUPAC
POLICY NUMBER:	11-04
DEPARTMENT COORDINATOR:	IHUPAC
MOTION:	Dave Munger
SECONDED:	Tara Tandrow
DATE APPROVED:	December 2018
SUNSET DATE:	2021

PURPOSE: To maintain the highest ethical standards between IHUPAC and both present & past IAHU leaders and employees.

POLICY: No person dealing with IAHU shall receive special favor or consideration because of that individual's current or former position with IAHU. No person acting on behalf of IAHU should have a material, financial stake in transactions concerning the PAC without the full knowledge and written consent of the Board of Trustees.

PROCEDURES:

Definitions: For purposes of this Policy and Procedure:

1. Conflict of interest means any transition in which a current or former IAHU Leader has a material financial interest. A conflicted individual is an IAHU Leader with a conflict of interest relative to a particular transaction.
2. IAHU Leaders means any member of IAHU Staff or any Member of IAHU Board or IHUPAC Board.
3. Former IAHU Leaders means individuals who were a IAHU Leader during any part of the 12 months preceding a vote concerning a transaction in which the Former IAHU Leader has a material, financial interest.
4. Material Financial Interest means any direct or indirect benefit, including salary and/or compensation received directly by a IAHU Leader or by a IAHU Leader's immediate relatives (parents, children, siblings, spouses and the spouse's immediate relatives), co-residents or roommates, or any corporation, partnership or business in which such person is an officer, partner, director, executive or major stockholder.

Disclosure:

1. A IAHU Leader shall disclose any material financial interest in transactions contemplated or entered into by IHUPAC as soon as such interest is known. Such notification must be made, in writing, to the IHUPAC President and IAHU President. If the potential conflict involves the President, additional notification shall be made to the President-Elect.
2. When IAHU Leaders or Former IAHU Leaders are aware of potential conflict of interest concerning a Former IAHU Leader such information shall be disclosed in the same manner as for current IAHU Leaders.

Recusal

1. Members of the IAHU Board and IHUPAC shall not participate in any discussion or vote concerning a transaction in which they have a conflict of interest.

a. By a majority vote of the IHUPAC, the conflicted individual may be permitted to participate in discussions concerning the transaction, but in no event may the conflicted individual vote on the matter.

b. In cases deemed appropriated by the President, a vote by the Board of Trustees in which at least 60 percent of its membership concurs, may permit a conflicted individual to participate in discussions on a transaction.

c. All votes by IHUPAC permitting a conflicted individual to participate in discussions concerning the transaction shall be reported immediately to the IAHU Board of Trustees. The Board of Trustees shall have the authority to overturn any decision made in connection to the conflict of interest.

2. Members of the IAHU Board and IHUPAC Board shall voluntarily recues themselves from activities in which they have or believe they have a conflict of interest. However, any other member of the IHUPAC Board may seek a vote of the full IHUPAC Board or IAHU Board to determine whether a conflict of interest exists.

a. If a majority of the IHUPAC Board or IAHU Board determines a conflict exists for an individual Member, that individual will not be permitted to participate in the discussion and vote concerning the transaction unless permitted to participate under Recusal item 1, above.

b. The individual subject to another Member of the IHUPAC Board's motion concerning a conflict of interest may participate but may not vote in the debate determining whether a conflict of interest exists.

3. IHUPAC shall report all incidences of conflicts of interest to the IAHU Board of Trustees including a description of how the conflict was handled.

Transactions Involving Conflicts of Interest

1. No active member of the IHUPAC Board or IAHU Board shall solicit PAC business for any reason.
2. If an IAHU member has entered a state run political campaign and is seeking donations.
3. If an IAHU member has entered a state run political campaign and is being considered for a donation.

FINANCIAL IMPACT: None