Conflict of Interest Policy

REASON FOR STATEMENT: The Colorado Children’s Immunization Coalition (CCIC), as a nonprofit, tax-exempt organization, depends on charitable contributions from the public. Maintenance of its tax-exempt status is important both for its continued financial stability and for the receipt of contributions and public support. The IRS and state corporate and tax officials view the operations of CCIC as a public trust that is subject to scrutiny by and accountable to governmental authorities as well as members of the public.

Consequently, there exists between CCIC and its board, officers, and management employees a fiduciary duty, which carries with it a broad and unbending duty of loyalty and fidelity. The board, officers, and management employees have the responsibility of administering the affairs of CCIC honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of CCIC. Those persons shall exercise the utmost good faith in all actions involved in their duties, and they shall not use their positions with CCIC or knowledge gained from their position, for their personal benefit. The interests of the organization must have the first priority in all decisions and actions.

PERSONS CONCERNED: This statement applies to CCIC directors, officers and all CCIC employees, consultants and volunteers who can influence the actions of CCIC (“Covered Person”). For example, this would include all persons who make purchasing decisions, all other persons who might be described as “management personnel,” and all who have proprietary information concerning CCIC.

AREAS IN WHICH CONFLICT MAY ARISE: Conflicts of interest may arise with any of the following third parties:

1. Persons and firms supplying goods and services to CCIC.
2. Persons and firms with whom CCIC is dealing or planning to deal with in connection with any contract, grant, gift, purchase or sale.
3. Competing or affinity organizations.
4. Donors, grantors and others who financially support CCIC.
5. Agencies, organizations, and associations that fund or otherwise affect the operations of CCIC.
6. Family members, friends, and other employees.

NATURE OF POTENTIAL CONFLICTING INTEREST: A potential conflicting interest is any interest, direct or indirect, with any person or entity mentioned above. Such an interest might arise through:

1. Owning stock or holding debt or other proprietary interests in any third party dealing with CCIC.
2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) in any third party dealing with CCIC.
3. Receiving remuneration for services with respect to individual actions involving CCIC.
4. Using CCIC's time, personnel, equipment, supplies, or good will for other than CCIC approved activities, programs, and purposes.
5. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) or involved in any project, product, issue or business endorsed or supported by CCIC.
6. Receiving personal gifts or loans from third parties dealing with CCIC. Receipt of any gift is disapproved except gifts of nominal value, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

**INTERPRETATION OF THIS STATEMENT OF POLICY:** The areas of conflicting interest listed in “Areas in Which Conflict May Arise” and the relations in those areas which may give rise to conflict, as listed in “Nature of Potential Conflicting Interest,” are not exhaustive. Conceivably, conflicts might arise in other areas or through other relations. It is assumed that Covered Persons will recognize such areas and relations by analogy.

The fact that one of the interests described in “Nature of Potential Conflicting Interest” exists does not mean necessarily that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material that upon full disclosure of all relevant facts and circumstances that it is necessarily adverse to the interests of CCIC.

However, it is the policy of the board that the existence of any of the interests described in “Nature of Potential Conflicting Interest,” shall be disclosed before any action is consummated. It shall be the continuing responsibility of any Covered Person to scrutinize his or her actions and outside business interests and relationships for potential conflicts and to immediately make disclosures of such interests as described below under “Disclosure Policy and Procedure”.

**DISCLOSURE POLICY AND PROCEDURE:** Disclosures of any potential conflicting interest of any Covered Person should be made according to the following procedures.

Disclosure of any potential conflicting interest shall be made by any Covered Person and may be made by any other interested party. The disclosure shall be made to the chief executive (or if she or he is the one with the potential conflicting interest, then to the board chair). The chief executive (or the board chair) shall make an initial determination whether a conflict exists and is material, and if the matters are material, bring them to the attention of the board.

The board shall make the final determination whether a conflict exists and is material. If the board determines that there is an existing material conflict, the board shall determine whether the contemplated action may be authorized in accordance with the standards stated below. The decision of the board on these matters will rest in their sole discretion, and their concern must be the welfare of CCIC and the advancement of its purpose.

Actions that present a material conflict of interest may be undertaken only if all of the following are observed:

1. The action is fully disclosed in the financial statements of the organization;
2. The Covered Person with the material conflict of interest is excluded from the approval of such action (and the discussion if requested by any board member); and
3. The board makes a specific determination that the action is just, fair and reasonable and in the best interests of CCIC.
Colorado Children’s Immunization Coalition Board Member Questionnaire
Questionnaire for Annual Tax Return Information on Form 990

Background

The Colorado Children’s Immunization Coalition (CCIC) is required to file annual information returns with the Internal Revenue Service. The return is Form 990-Return of Organization Exempt from Income Tax. Form 990 is a public document and is available to all individuals who request a copy. In addition, the Form 990 is available online through a free website: www.guidestar.org and is also posted on the CCIC website.

A number of questions on Form 990 and the related Schedule L deal with compensation matters and payments to related parties, including family members. In order to obtain accurate information for the tax return, we are requesting all Board Members to answer the following questions.

Board Members -- Direct Relationships

1. Have you received any payments (other than expense reimbursements) from CCIC? Are you employed by a company that does business with CCIC? Do you have an ownership interest in a company (other than a publicly-traded entity) that does business with CCIC?

   Yes _________ No __________

   If the answer is Yes, please explain in the following space:

____________________________________________________________________________
____________________________________________________________________________
____________________________________________________________________________

Board Members -- Family Relationships

2. Are you related to any individuals who are employed by CCIC? Are you related to any individuals that do business with CCIC, either directly or as employees and/or owners of companies? For the purpose of these questions, the IRS defines a “family relationship” as an individual’s spouse, ancestors, children, grandchildren, great-grandchildren, siblings (whether by whole or half blood), and the spouses of children, grandchildren, great-grandchildren, and siblings.

   Yes _________ No __________

   If the answer is yes, please explain in the following space:
Signature

______________________________
Name ____________________________ Date ______________________

BOD APPROVED 7/17/08