

Fiduciary Independence Disclosure Procedure

Procedure Information:

Implements Policy:	Intermountain Conflict of Interest and Independence Disclosure Policy		
Content Owner	Suzie Draper, Vice President, Business Ethics and Compliance, Compliance	Content Consultant(s):	Doug Hammer, General Counsel, Legal Department Morris Linton, Senior Counsel, Legal Department Brian Deppe, Corporate Tax Director, Finance
Date Created:	3/02/09	Who Should Review Prior to Approval?	Intermountain Healthcare Board Executive Committee Intermountain Healthcare Board Audit Committee
Date of Approval:	4/1/09		
Keywords (must have at least 3):	Board, Trustee, 990, IRS, Independence, Independent, Conflict of Interest		Bert Zimmerli, Senior Vice President/Chief Financial Officer

Purpose

This procedure implements the independence portion of the "Intermountain Conflict of Interest and Independence Disclosure Policy."

Scope

This policy applies to every Intermountain organization and to every Fiduciary of an Intermountain organization. Intermountain's organizations include the following:

- Intermountain Health Care, Inc.
- IHC Health Services, Inc. (including Fiduciaries of Community Boards and of the IHC Home Care Board)
- IHC Management, Inc.
- SelectHealth, Inc.
- Intermountain Healthcare Foundation, Inc.
- IHC Professional Services, Inc.
- Intellectual Asset Management, LLC
- SelectHealth Benefit Assurance Company, Inc.
- Healthcare Captive Insurance Company
- IHC Affiliated Services, Inc.

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Definitions

“Fiduciary” means an Intermountain Trustee, an Intermountain Officer, or a member of a Board Committee of an Intermountain organization.

“Intermountain” means any of the Intermountain organizations specified above.

Procedure

1. At least once each year, every Fiduciary will complete an “Intermountain Healthcare Fiduciary Conflict of Interest/Independence Questionnaire.” A Fiduciary will also update his or her most recently completed questionnaire each time the Fiduciary becomes aware of a financial interest, a potential conflict, or a change to any information that the Fiduciary previously reported.
2. Intermountain’s Vice President of Business Ethics and Compliance will collect the questionnaires and evaluate the disclosures in light of the independence criteria established by the IRS then in effect.
3. The Vice President of Business Ethics and Compliance may consult with Intermountain’s Audit Committee Chair, Senior Management, Executive Committee, Legal Department, or any representatives from those Intermountain groups to resolve any issue about a Fiduciary’s independence.
4. The Vice President of Business Ethics and Compliance will report the results of the evaluation and any consultation to Senior Management and to Intermountain’s Audit Committee.
5. After Intermountain resolves any questions about a Fiduciary’s independence, the Vice President of Business Ethics and Compliance will give a copy of the final report on Fiduciary independence to Intermountain’s Corporate Tax Director, who will use the report to complete Intermountain’s annual IRS Form 990 filing.

Exceptions

N/A.

Secondary Materials

- Trustee and Officer Conflict of Interest and Independence Disclosure Policy
- Intermountain Healthcare Trustees and Officers Conflict of Interest/Independence Questionnaire
- Trustee and Officer Conflict of Interest Disclosure Procedure
- Internal Revenue Service Form 990
- Internal Revenue Service Form 990 Instructions