

Conflict of Interest at NS EE Holdings Frequently Asked Questions

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

- Chrome
- Safari
- Microsoft Edge
- Firefox

2. How do I log into the COI Smart software?

To access the questionnaire, please use the links that were provided to you in the announcement email. These links are unique to your relationship to the organization and how you log into the system.

- If you are an employee, you must be logged onto the network to activate single sign-on (SSO).
- If you are not an employee, please enter your username and password.

3. What is my username and password?

If you are an employee, your username and password are your network login/system ID and password. To login, you need to enter a domain and “\” in front of your username. The domains and examples are as follows:

*NorthShore, Swedish and NCH employees will need to enter their domain and a **backslash** \ in front of their network username (see below).*

- **I am an EEH Employee** – No domain needed, just enter your username from below and your network password. Single sign on may be activated.
- **I am a NorthShore Employee or a Swedish Employee** – Your username is ENHNET\username (provided in the announcement email). Your password is your network password.
- **I am a Northwest Community Employee** - Your username is NCH\username (provided in the announcement email). Your password is your network password.
- **I am a non-employee** – No domain needed, just enter your username from the announcement email. You will be prompted to establish a password.

4. What is the link to login?

The link is provided in the announcement email and is unique to your relationship with the organization:

- **Employee link** - <https://edward.coi-smart.com/>
- **Non-Employee link** - <https://edward-nonshib.coi-smart.com>

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

Covered 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.

6. 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.

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

If you need to change one of your responses, you should log back into COI Smart to change the response. You can log in at any time from the original email or using the links from Question 4 above.

8. How do I revise a response?

- a) Log in to COI Smart, using links from Question 4 above.
- 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

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

NS-EE Holdings employees may accept gifts of a nominal value from any individual or organization who has a stable business relationship with NS-EE Holdings. For purposes of this paragraph, physicians practicing in NS-EE Holdings 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 NS-EE Holdings. 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 anyone who is actively bidding to provide goods or services to NS-EE Holdings.

10. 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).

11. What does NS-EE Holdings do with Open Payments data?

NS-EE Holdings will compare disclosures made as part of this process with the most recent Governmental Open Payments data realizing that there may be discrepancies because of the time lag of Open Payments information. 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.

12. 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>

13. Who are Covered Persons?

Covered Persons include:

- a. Members of the Board of Directors and all officers;
- b. Members of the Management;
- c. Employed Providers who are compensated by NS-EE Holdings as employees, including but not limited to physicians who have been retained or employed as Medical Directors or Medical Advisors;
- d. Professional Services Agreement Providers;
- e. Members of the Pharmaceutical and Therapeutics and Value Analysis Committees;
- f. Department chairs and medical directors;
- g. certain other physicians identified by senior management as potentially having a conflict;
- h. Medical Staff Presidents;
- i. Employees and agents of NS-EE Holdings and each affiliate which are so designated by the President/CEO of that affiliate;
- j. Any NS-EE Holdings employee who has a Financial Interest, at such time when that Financial Interest arises.