

MTC Compliance Committee

Purpose:	<i>This procedure provides guidance for a system to identify and monitor compliance with specific Michigan Trauma Coalition's (MTC) policies, procedures, and bylaws items, as determined by the MTC Executive Board.</i>
Description and Process:	<ol style="list-style-type: none"> 1. <i>The MTC Compliance Committee will consist of at least three (3) MTC member hospital representatives.</i> 2. <i>The committee will meet at least annually.</i> 3. <i>The committee will review:</i> <ol style="list-style-type: none"> a. <i>MTC compliance with its Conflict of Interest (COI) policy;</i> b. <i>An annual review of the MTC Bylaws;</i> c. <i>An annual review to verify which officer positions are due to be placed on the annual ballot for the Annual Election;</i> d. <i>Other policy and compliance reviews as assigned by the MTC Executive Board.</i> 4. <i>The committee will provide an annual written report to the MTC Executive Board, prior to its 3rd Quarter meeting.</i>
Background:	<ol style="list-style-type: none"> 1. <i>The IRS advises nonprofit entities to have certain written policies as a matter of good governance, including a conflict of interest (COI) policy, along with monitoring of policy compliance.¹⁻²</i> <ol style="list-style-type: none"> a. <i>Example question from IRS form 990:</i> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>12a Did the organization have a written conflict of interest policy? If "No," go to line 13</p> <p>b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?</p> <p>c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this was done</p> </div> 2. <i>Other good governance policies include a regular review of bylaws, to review compliance and promote transparency.³⁻⁴</i>
References:	<ol style="list-style-type: none"> 1. <i>2020 Instructions for Form 990 - Return of Organization Exempt From Income Tax Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code. https://www.irs.gov/pub/irs-pdf/i990.pdf. Section B, Policies, P. 24. (Downloaded 3-13-21)</i> 2. <i>Good Governance Policies for Non-Profits. National Council of Non-Profits: https://www.councilofnonprofits.org/tools-resources/good-governance-policies-nonprofits (Downloaded 3-13-21)</i> 3. <i>The Standards for Excellence: An Ethics and Accountability Program for the Nonprofit Sector. https://higherlogicdownload.s3.amazonaws.com/ANANURSESPACE/8176cfba-e7f5-4ae3-a7dd-7d7dfe2c4450/UploadedImages/990_Policy_Compendum_packet_May_2014.pdf (Downloaded 3-13-21)</i> 4. <i>Best Practices for Non-Profit Bylaws. Board Effect: https://www.boardeffect.com/blog/best-practices-nonprofit-bylaws/ (Downloaded 3-13-21)</i>
Date	<i>April 13, 2021</i>
Process owner	<i>MTC President</i>
Reviewed by:	<i>MTC Executive Board</i>
Exec. Board Approval Date	<i>April 16, 2021</i>