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Owner:	<i>Karen Mottola: Research Compliance Officer</i>
Policy Area:	<i>Research</i>
References:	
Applicability:	<i>Sutter Health System</i>

Research Financial Conflict of Interest Policy

PURPOSE

The purpose of this policy is to promote objectivity in Research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of Research will be free from bias resulting from Investigator FCOI. To ensure that Research is conducted with integrity and transparency, and that the rights and interests of human subjects are protected, arrangements involving Investigators who have a financial or fiduciary interest in an outside entity, to the extent such arrangements may represent a source of conflict or an appearance of conflict, must be identified and addressed. All requirements of Sutter Health's general Conflict of Interest Policy apply.

POLICY

It is the policy of the Research Strategy and Operations Committee (RSOC)¹ to ensure procedures are in place to identify Financial Conflicts of Interest in Research activities and manage them effectively.²

¹Or, should RSOC undergo a name change, the subject matter expert committee designated to govern research policy-making.

²This policy employs language taken directly from "Promoting Objectivity in Research" (42 CFR 50, Subpart F).

SCOPE

This policy applies to Sutter Health, its Affiliated Entities and Operating Corporations (as those terms are defined in the Sutter Health Bylaws) and other entities or organizations in which Sutter Health or an Affiliated Entity or Operating Corporation has a direct or indirect equity interest of greater than 50% (hereafter referred to as "Sutter Health").

DEFINITIONS

As used in this policy, terms are defined following the language of "Promoting Objectivity in Research" (42 CFR 50, Subpart F):

Designated Official means the Sutter Health individual identified to solicit and conduct review of disclosures of Significant Financial Interests from each Investigator.

Financial Conflict of Interest (FCOI) means a Significant Financial Interest that could directly and

significantly affect the design or conduct of Research or reporting of Research results.

FCOI Regulation means “Promoting Objectivity in Research” (42 CFR 50, Subpart F).

Financial Interest means anything of monetary value, whether or not the value is readily ascertainable.

Investigator means either a PHS Investigator or a Non-PHS Investigator.

Investigator Responsibilities means an Investigator’s professional responsibilities on behalf of Sutter Health. Such professional responsibilities may include activities such as Research, Research consultation, teaching, professional practice, clinical service, outreach, public service, institutional committee memberships, and service on panels such as Institutional Review Boards or data, quality and safety monitoring boards or committees.

Manage means taking action to address an FCOI, which can include reducing or eliminating the FCOI, to ensure, to the extent possible, that the design or conduct of Research or and reporting of Research results will be free from bias.

Non-PHS-funded Research means any research funded by a non-PHS entity.

Non-PHS Investigator means any individual identified as a principal investigator, co-investigator, or sub-investigator on the Institutional Review Board application and/or FDA Form 1572 for non-PHS-funded studies.

Public Health Service (PHS) means the PHS of the United States Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health.

PHS Investigator means the project director or principal investigator (PD/PI) and any other person regardless of title or position, who is responsible for the design, conduct, or reporting of Research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants.

PHS-funded Research means research funded by PHS, which could include the following: research contracts, research grants, career development awards, center grants, cooperative agreements, individual fellowship awards, infrastructure awards, institutional training grants, program projects or research resources awards and conference grants. Only Phase I Small Business Innovative Research ("SBIR") and Small Business Technology Transfer ("STTR") awards programs are excluded.

PHS Awarding Component means the organizational unit of the PHS that funds the Research that is subject to this subpart.

Research means a systematic investigation, study or experiment designed to develop or contribute to general knowledge (basic research) or specific knowledge (applied research) relating broadly to public health by establishing discovering, developing, elucidating or confirming information about, or the underlying mechanism relating to, biological causes, functions or effects, diseases, treatments, or related matters to be studied.

Senior/Key Personnel means the PD/PI and any other person identified as Senior/Key Personnel by Sutter Health in the grant application, progress report, or any other report submitted to the PHS by Sutter Health.

Significant Financial Interest (SFI) means:

- A. A Financial Interest consisting of one or more of the following interests of the Investigator (and those of his or her immediate family, including dependent children or spouse, or those with whom the Investigator maintains living arrangements approximating a family relationship) that reasonably appears to be related to the Investigator’s institutional responsibilities:

1. With regard to any publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
 2. With regard to any non-publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or Investigator's spouse, dependent children, or those with whom the Investigator maintains living arrangements approximating a family relationship) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
 3. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
- B. Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. This includes: the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with this policy, the Designated Official shall determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded Research and non-PHS-funded Research.
- C. The term Significant Financial Interest does not include the following types of Financial Interests: salary, royalties, or other remuneration paid by Sutter Health to the Investigator if the Investigator is currently employed or otherwise appointed by Sutter Health, including intellectual property rights assigned to Sutter Health and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or income from service on advisory committees or review panels for a Federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

PROCEDURE

- A. Each Investigator shall:
1. read, understand and abide by this policy;
 2. disclose his/her SFI (and the SFI of his/her immediate family, including dependent children or spouse, or those with whom the Investigator maintains living arrangements approximating a family relationship), including reimbursed or sponsored travel, received in the preceding 12 months

- a. for PHS-funded Research, initial disclosure must occur no later than at time of initial application; and
 3. complete training regarding FCOI prior to engaging in Research related to any PHS-funded grant and before commencing non-PHS Research activities and, thereafter, at least every four years, and immediately if any of the following circumstances apply:
 - a. Sutter Health revises its FCOI policies or procedures in any manner that affects the requirements of Investigators;
 - b. An Investigator is new to Sutter Health;
 - c. Sutter Health finds that an Investigator is not in compliance with this policy or the Research FCOI processes.
 4. comply with any FCOI management plan as specified and, upon SH request, verify full conformance
- B. Sutter Health shall comply with the requirements set forth in the FCOI Regulations, including:
1. maintaining an up-to-date, written, enforced policy on FCOI that complies with the FCOI Regulations and make such policy available via a publicly accessible Web site;
 2. informing each Investigator of this policy, the Investigator's Responsibilities regarding disclosure of Significant Financial Interests, and of the FCOI Regulations;
 3. requiring each Investigator to complete FCOI training;
 4. for PHS-funded Research, taking reasonable steps to ensure that any subrecipient Investigator complies with the FCOI Regulations by:

as part of a written agreement with the subrecipient terms that establish whether the Sutter Health research financial conflicts of interest policy or that of the subrecipient will apply to the subrecipient's Investigators.

- i. If the subrecipient's Investigators must comply with the subrecipient's financial conflicts of interest policy, the subrecipient shall certify as part of the agreement referenced above that its policy complies with this subpart. If the subrecipient cannot provide such certification, the agreement shall state that subrecipient Investigators are subject to the Sutter Health financial conflicts of interest policy for disclosing significant financial interests that are directly related to the subrecipient's work for the awardee Institution;
 - ii. Additionally, if the subrecipient's Investigators must comply with the subrecipient's financial conflicts of interest policy, the agreement referenced above shall specify time period(s) for the subrecipient to report all identified financial conflicts of interest to the awardee Institution. Such time period(s) shall be sufficient to enable Sutter Health to provide timely FCOI reports, as necessary, to the PHS as required by the FCOI Regulations;
 - iii. Alternatively, if the subrecipient's Investigators must comply with SH's financial conflicts of interest policy, the agreement referenced above shall specify time period(s) for the subrecipient to submit all Investigator disclosures of significant financial interests to the awardee Institution. Such time period(s) shall be sufficient to enable Sutter Health to comply timely with its review, management, and reporting obligations under the FCOI Regulations.
- b. Providing FCOI reports to the PHS Awarding Component regarding all financial conflicts of interest of all subrecipient Investigators consistent with the FCOI Regulations, i.e., prior to the expenditure of funds and within 60 days of any subsequently identified FCOI.

5. providing guidelines consistent with the FCOI Regulations for the Designated Official to determine whether an Investigator's SFI is related to Research and, if so related, whether the SFI is an FCOI;
6. ensuring, prior to Sutter Health's expenditure of any funds under a PHS-funded Research project:
 - a. the Designated Official(s) has reviewed all Investigator disclosures of SFIs; determined whether any SFIs relate to the PHS-funded research; determined whether an FCOI exists; and, if so, developed and implemented a management plan that shall specify the actions that have been, and shall be, taken to manage such FCOI
 - b. public accessibility, via a publicly accessible Web site or written response to any requestor within five business days of a request, of information concerning any SFI disclosed to Sutter Health that meets the following three criteria: 1) the SFI was disclosed and is still held by the Senior/Key personnel; 2) Sutter Health determines that the SFI is related to the PHS-funded research; and 3) Sutter Health determines that the SFI is an FCOI.
 - i. the information that Sutter Health makes available via a publicly accessible Web site or written response to any requestor within five business days of a request, shall include, at a minimum, the following: the Investigator's name; the Investigator's title and role with respect to the research project; the name of the entity in which the SFI is held; the nature of the SFI; and the approximate dollar value of the SFI (within these ranges: \$0-\$4,999; \$5,000-\$9,999; \$10,000-\$19,999; amounts between \$20,000-\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.
 - ii. if Sutter Health uses a publicly accessible Web site, the information that SH posts shall be updated at least annually. In addition, Sutter Health shall update the Web site within sixty days of its receipt or identification of information concerning any additional SFI of the Senior/Key personnel for a PHS-funded research project that was not previously disclosed, or upon the disclosure of an SFI of Senior/Key personnel new to a PHS-funded research project, if Sutter Health determines that the significant financial interest is related to the PHS-funded research and is a financial conflict of interest. The Web site shall note that the information provided is current as of the date listed and is subject to updates, on at least an annual basis and within 60 days of Sutter Health's identification of a new FCOI. If Sutter Health responds to written requests, it shall note in its written response that the information provided is current as of the date of the correspondence and is subject to updates, on at least an annual basis and within 60 days of Sutter Health's identification of a new FCOI, which should be requested subsequently by the requestor.
 - iii. Information concerning the SFI of an individual subject to sections B6(b)(i-ii) shall remain available, for responses to written requests or for posting via Sutter Health's publicly accessible Web site for at least three years from the date that the information was most recently updated.
 - c. Sutter Health shall provide to the PHS Awarding Component an FCOI report regarding any Investigator's SFI found by Sutter Health to be conflicting and ensuring that Sutter Health has implemented a management plan. In cases in which Sutter Health identifies an FCOI and eliminates it prior to the expenditure of PHS-awarded funds, Sutter Health shall not submit an FCOI report to the PHS Awarding Component.
7. whenever SH implements a management plan, monitoring Investigator compliance with the

management plan on an ongoing basis until the completion of the PHS-funded Research project. For non-PHS-funded Research, the Investigator shall comply with SH requests to verify conformance with a management plan.

8. maintaining records relating to all Investigator disclosures of FI (for PHS-funded Research, in accordance with 45 CFR 75.361);
9. ensuring that whenever Sutter Health identifies an SFI that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed by Sutter Health during an ongoing PHS-funded Research project (e.g., was not timely reviewed or reported by a subrecipient), the Designated Official(s), within 60 days: reviews the SFI; determines whether it is related to the research; determines whether an FCOI exists; and, if so:
 - a. implements, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to manage such FCOI going forward;
 - i. in addition, whenever an FCOI is not identified or managed in a timely manner (including failure by an Investigator to disclose an SFI that is determined by Sutter Health to constitute an FCOI, failure by Sutter Health to review or manage such an FCOI, or failure by an Investigator to comply with an FCOI management plan) Sutter Health shall, within 120 days of its determination of noncompliance, complete a retrospective review of the Investigator's activities and the PHS-funded Research project to determine whether any PHS-funded research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research.
 - ii. Sutter Health shall document the retrospective review; such documentation shall include, but not necessarily be limited to, all of the following key elements:
 - a. Project number;
 - b. Project title;
 - c. PD/PI or contact PD/PI if a multiple PD/PI model is used;
 - d. Name of the Investigator with the FCOI;
 - e. Name of the entity with which the Investigator has an FCOI;
 - f. Reason(s) for the retrospective review;
 - g. Detailed methodology used for the retrospective review (e.g., methodology of the review
 - h. process, composition of the review panel, documents reviewed);
 - i. Findings of the review; and
 - j. Conclusions of the review.
 - b. based on the results of the retrospective review, if appropriate, Sutter Health shall update the previously submitted FCOI report, specifying the actions that will be taken to manage the FCOI going forward. If bias is found, Sutter Health shall notify the PHS Awarding Component promptly and submit a mitigation report to the PHS Awarding Component. The mitigation report must include, at a minimum, the key elements documented in the retrospective review above and a description of the impact of the bias on the research project and SH's plan of action or actions taken to eliminate or mitigate the effect of the bias (e.g., impact on the research project; extent of harm done, including any qualitative and quantitative data to support any actual or future

harm; analysis of whether the research project is salvageable). Thereafter, Sutter Health will submit FCOI reports annually. Depending on the nature of the FCOI, Sutter Health may determine that additional interim measures are necessary with regard to the Investigator's participation in the PHS-funded Research project between the date that the FCOI or the Investigator's noncompliance is determined and the completion of Sutter Health's retrospective review.

10. ensuring that, for any SFI that Sutter Health identifies as conflicting subsequent to its initial FCOI report during an ongoing PHS-funded research project (e.g., upon the participation of an Investigator who is new to the research project or new SFI for existing Investigator), Sutter Health shall provide to the PHS Awarding Component, within sixty days: an FCOI report regarding the FCOI and ensure that Sutter Health has implemented a management plan in accordance with this regulation.
11. ensuring that, for any FCOI previously reported by Sutter Health with regard to an ongoing PHS-funded research project, Sutter Health shall provide to the PHS Awarding Component an annual FCOI report that addresses the status of the FCOI and any changes to the management plan for the duration of the PHS-funded research project. The annual FCOI report shall specify whether the FCOI is still being managed or explain why the FCOI no longer exists. Sutter Health shall provide annual FCOI reports to the PHS Awarding Component for the duration of the project period (including extensions with or without funds) in the time and manner specified by the PHS Awarding Component.
12. establishing adequate enforcement mechanisms and providing for employee sanctions or other administrative actions to ensure Investigator compliance as appropriate.

C. Investigator disclosure of SFI shall proceed as follows:

1. Each Investigator who is planning to participate in Research must disclose to the Designated Official his or her SFI, including reimbursed or sponsored travel, (and those of his or her immediate family, including dependent children or spouse, or those with whom the Investigator maintains living arrangements approximating a family relationship) received in the preceding 12 months, no later than the time of application for Research funding. The disclosure shall be made using the disclosure form and process authorized by Sutter Health.
2. Each Investigator who is participating in Research must submit an updated disclosure of SFI before commencement of new Research and at least annually during the period of the award. This will be accomplished by completing the annual FCOI form that will be distributed by the Designated Official. Such disclosure shall include any information that was not disclosed initially to Sutter Health or in a subsequent disclosure of SFI and any updated information regarding any previously disclosed SFI. If the time between initial disclosure and Research commencement is less than one year and SFI has not changed, the Investigator need not update the disclosure until the annual disclosure deadline.
3. Each Investigator who is participating in Research must submit an updated disclosure of SFI within 30 days of discovering or acquiring a new SFI.
4. Each Investigator who is new to participating in an ongoing Research project must submit a disclosure of SFI within 30 days of joining the Research project.
5. The Investigator may be requested to provide further details regarding financial disclosure information to assist with the determination of whether SFI exists.
6. Sutter Health shall maintain a process for review, determination and appropriate action for management of FCOI related to Research. Upon disclosure of an SFI, the Designated Official will determine whether an Investigator's SFI is an FCOI.

- D. Sutter Health shall take actions as necessary to Manage any identified FCOI. Such actions include development and implementation of a management plan and, if necessary, a retrospective review and a mitigation report. The management plan shall specify the actions that have been, and shall be, taken to Manage such FCOI.
1. All identified FCOI shall be taken to the Sutter Health Conflict of Interest Committee for Research, for development and implementation of a management plan. The Sutter Health Chief Medical Officer shall direct the committee or assign a designee to direct the committee.
 2. Sutter Health shall develop and impose conditions or restrictions to Manage an FCOI. Such actions may include, but are not limited to:
 - a. public disclosure of FCOI (e.g., when presenting or publishing the Research);
 - b. for Research projects involving human subjects Research, disclosure of FCOI directly to participants;
 - c. appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the Research against bias resulting from the FCOI;
 - d. modification of the Research plan;
 - e. change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the Research;
 - f. reduction or elimination of the Financial Interest; or
 - g. severance of relationships that create the FCOI.
 3. Whenever an SFI is identified that was not, for whatever reason, disclosed as required by an Investigator, the Designated Official shall, within 60 days upon discovering the SFI: initiate a review of the SFI; determine whether it is related to PHS-funded Research; determine whether an FCOI exists; and, if so, implement, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to Manage such FCOI going forward.
 4. Whenever an Investigator fails to comply with an FCOI management plan, Sutter Health shall, within 120 days of the determination of noncompliance, complete a retrospective review of the Investigator's activities and the PHS-funded Research project to determine whether any PHS-funded Research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such Research.
 5. If the failure of an Investigator to comply with this policy or an FCOI management plan appears to have biased the design, conduct, or reporting of PHS-funded Research, Sutter Health shall promptly notify the PHS Awarding Component of the corrective action taken or to be taken and shall adhere to the direction, if given, of the PHS Awarding Component.
 6. If the failure of an Investigator to comply with this policy or an FCOI management plan appears to have biased the design, conduct, or reporting of Research, Sutter Health shall take appropriate action and impose sanctions, which may include a written warning and placement of a letter in the Investigator's personnel file, termination of award, suspension of the privilege to apply for external funding, permanent suspension of the ability to perform Research activities at Sutter Health, suspension for a specified period of time, or termination of employment/affiliation.
 7. In any case in which Sutter Health determines that a project of clinical Research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, conducted, or reported by an Investigator with an FCOI that was not Managed in accordance with a

prescribed management plan or reported by the Investigator as required by this policy, Sutter Health shall require the Investigator involved to disclose the FCOI in each public presentation of the Research and to request an addendum to previously published presentations. If the FCOI is related to PHS-funded Research, Sutter Health may report the non-compliance to the Office for Human Research Protections of HHS. Any FCOI may be reported to the supervising Institutional Review Board and/or any other individuals and/or agencies Sutter Health determines should be informed.

8. Appeal of the management plan may be made to the designee authorized by Sutter Health.

E. Regarding FCOI related to PHS-funded Research, Sutter Health shall maintain records relating to all Investigator disclosures of Financial Interests and the Sutter Health’s review of, and response to, such disclosures (whether or not a disclosure resulted in determination of an FCOI) and all actions under this policy or retrospective review, if applicable, for at least three years from the date the final Research expenditures report is submitted to the PHS or, where applicable, from other dates specified in “Retention requirements for records” [45 CFR Part 75.361].

1. Sutter Health shall maintain documentation on all reporting to the PHS Awarding Component including corrective action plans and documentation of completion of prescribed plans.

REFERENCES

[42 CFR Part 50 Subpart F](#)

[45 CFR Part 75.361](#)

[Sutter Health Conflict of Interest Policy](#)

National Institutes of Health Financial Conflict of Interest Policy: <http://grants.nih.gov/grants/policy/coi/>

[45 CFR 92.42\(b\) - HHS Retention and Access Requirements](#)

ATTACHMENTS

none

All revision dates:

12/6/2017, 7/24/2015

Attachments:

[42 CFR 50 Subpart F, Promoting Objectivity in Research.pdf](#)
[Exhibit B - 45 CFR Part 74 - Uniform Administrative Requirements for Awards and Subawards to Institutions.pdf](#)
[Exhibit D - 45 CFR 92.42\(b\) - HHS Retention and Access Requirements.pdf](#)

Approval Signatures

Step Description	Approver	Date
Policy Owner	Karen Mottola: Research Compliance Officer	12/6/2017
System Policy & Procedure Committee	Joyce Sklark: Policy & Procedure Mgmt Mgr	11/14/2017
System Enterprise Compliance Officer	Greta Fees: Ancill/Spec Svcs Compl Officer	11/13/2017

Step Description	Approver	Date
Research Strategy & Operations Committee	Karen Mottola: Research Compliance Officer	11/2/2017
Policy Owner	Karen Mottola: Research Compliance Officer	11/2/2017

Applicability

Alta Bates Summit Medical Center, Briggsmore Specialty Center, California Pacific Medical Center, Capitol City Surgery Center, Carlsbad Surgery Center, Central Valley Region, Coast Center Orthopedic & Arthroscopic Surgery, East Bay Endoscopy Center, East Bay Region, Eden Medical Center, Fort Sutter Surgery Center, Golden Gate Endoscopy Center, La Jolla Orthopedic Surgery Center, Memorial Hospital Los Banos, Memorial Medical Center Modesto, Menlo Park Surgical Hospital, Mid-Peninsula Endoscopy Center, Mills-Peninsula Medical Center, North Bay Regional Surgery Center, Novato Community Hospital, Otay Lakes Surgery Center, PAMF Surgery Center Fremont, PAMF Surgery Center Los Altos, PAMF Surgery Center Mountain View, PAMF Surgery Center Palo Alto, PAMF Surgery Center San Carlos, PAMF Surgery Center San Jose, Palo Alto Medical Foundation, Peninsula Eye Surgery Center, SMF-Surgery and Endoscopy Center, Sac Sierra Region, Samuel Merritt University, San Francisco Endoscopy Center, San Leandro Surgery Center, Santa Rosa Surgery and Endoscopy Center, Stanislaus Surgical Hospital, Stockton Surgery Center, Sutter Alhambra Surgery Center, Sutter Amador Hospital, Sutter Amador Surgery Center, Sutter Auburn Faith Hospital, Sutter Auburn Surgery Center, Sutter Care at Home, Sutter Center for Psychiatry, Sutter Coast Hospital, Sutter Davis Hospital, Sutter Delta Medical Center, Sutter East Bay Medical Foundation, Sutter Elk Grove Surgery Center, Sutter Fairfield Surgery Center, Sutter Gould Medical Foundation, Sutter Health Plus, Sutter Health System, Sutter Health System Office, Sutter Institute for Medical Research, Sutter Lakeside Hospital, Sutter Maternity & Surgery Center, Sutter Medical Center Sacramento, Sutter Medical Foundation, Sutter Pacific - Kahi Mohala, Sutter Pacific Medical Foundation, Sutter Physician Services, Sutter Roseville Endoscopy Center, Sutter Roseville Medical Center, Sutter Santa Rosa Regional Hospital, Sutter Senior Care, Sutter Shared Lab, Sutter Sierra Surgery Center, Sutter Solano Medical Center, Sutter Surgery Center Division, Sutter Surgical Hospital North Valley, Sutter Tracy Community Hospital, Walnut Creek Endoscopy Center, West Bay Region