

COLORADO ACCESS
CONFLICTS OF INTEREST PLAN

May 2018

Colorado Access is entrusted with providing health care of the state’s most vulnerable populations. In exercising this trust, Colorado Access also seeks to improve the overall health of the communities we serve and to increase access to health care. To do this, we must be good stewards of the funding we receive to fulfill our mission and of Colorado Access’s reputation. Part of being a good steward is avoiding conflicts of interest.

To avoid Conflicts of Interest, Colorado Access has adopted a six-prong Conflicts of Interest Plan. The Conflicts of Interest Plan is posted on the Colorado Access public website. Each prong of this Plan contains a policy, procedures for identifying, disclosing and resolving conflicts, training and forms:

1. Board of Directors
 - a. Confidentiality and Conflicts of Interest Policy (“Board Policy”);
 - b. Annual Attestation that Board Members have received, read and understand Board Policy;
 - c. Training on the Policy, as needed;
 - d. Annual Disclosure of Conflicts form.

2. Employees
 - a. A section of the Employee Policy/Benefits Handbook devoted to Conflicts of Interest;
 - b. A section of the Employee Code of Conduct devoted to Conflicts of Interest;
 - c. A policy regarding Gifts, Meals and Entertainment;
 - d. Annual Attestation of Executives;
 - e. Annual Disclosure of Conflicts form by Executives.

3. Governance Councils
 - a. A section in the Charter devoted to Confidentiality and Conflicts of Interest;
 - b. Confidentiality and Conflicts of Interest Policy;
 - c. Annual Attestation;
 - d. Annual Disclosure of Conflicts;
 - e. Antitrust Training;
 - f. Conflicts of Interest Training;

4. Member Councils
 - a. Member Advisory Council Charter, containing a Code of Conduct which requires disclosure of conflicts of interest.

5. Health Plan Vendors (excluding Providers)
 - a. Purchasing Policy;
 - b. Procurement process that includes an approval process (Contained in Purchasing Policy);

- c. Obligational Authority policy;
- d. Vendor background checks, as needed.

6. Providers, including Assignees, Subcontractors and Delegates

- a. Provider base agreements include language regarding Fraud and Abuse;
- b. Provider Manual, containing sections regarding Antitrust and Fraud and Abuse;
- c. Development of Colorado Access Attribution Work Group to monitor and resolve any attribution issue;
- d. Policies regarding reimbursement, reimbursement rates and single case agreements that are equally applied;
- e. Provider Credentialing policies and procedures.