



THE UNIVERSITY OF ARIZONA
HEALTH PLANS

SUBJECT: Conflict of Interest

POLICY: CP 6024

Department of Origin: Compliance and Audit
Responsible Position: Director of Compliance

Date(s) of Review and Revision: 04/07; 10/07; 09/08; 04/11; 12/11; 01/12, 06/12;
02/14; 05/14; 09/14; 2/15; 7/16

Policy Replaces: CP 802; CP 1802 S

Department Approval:



FW Tasks - Please
approve CP 6024 Con

PURPOSE

This policy focuses on the University of Arizona Health Plans (Health Plan) areas of concerns dealing with Conflict of Interest. This policy is intended as a supplement to the Banner Health corporate policy 2794 Conflict of Interest and not as a standalone policy.

APPLICABILITY

This policy applies to all lines of business.

POLICY

To protect the interest of the Health Plan when it contemplates entering into a transaction or arrangement that may benefit the private interest of an applicable person or result in a possible transaction of excess benefit. The Health Plan preserves integrity and independence in decision-making and exercising judgment in conducting its affairs; this is achieved through identification, assessment and either elimination or management of Conflicts of Interest. This policy is intended to supplement but not supersede corporate policy 2794 Conflict of Interest or applicable state and federal laws governing Conflict of Interest.

DEFINITIONS

Please refer to the link below for full definitions for the following terms:

<http://sharepoint/sites/hppandp/new/Lists/Definitions/PP%20Definitions.aspx>

Conflict of Interest

Covered Persons

Family Member

First Tier, Downstream and Related Entities (FDR)

Participating Provider

PROCEDURE

- 1.0 All Covered Persons avoid actual or perceived Conflict of Interest by appropriately disclosing Conflict of Interest. All Covered Persons are screened for Conflicts of Interest at the time of hire and annually thereafter.
- 2.0 All Health Plan employees identified as Covered Persons are required to submit disclosures to the Banner Vice President of Internal Audit annually.
- 3.0 This disclosure affirms that the individual completing the survey and disclosure:
 - 3.1 Has received a copy of the BH Policy 2794
 - 3.2 Has read and understands the policy
 - 3.3 Has agreed to comply with the policy
 - 3.4 Understands that Banner Health is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax exempt purposes
 - 3.5 Has responded fully, accurately and completely to all questions in the disclosure form.
- 2.1.1 All disclosed Conflicts of Interest will be reviewed by the Corporate Compliance Officer.
- 2.2
- 2.3 All Covered Persons are required to disclose any potential Conflict of Interest.
- 2.4 Covered Persons that have a Conflict of Interest, must obtain management approval to work under appropriate management or eliminate the Conflict of Interest.
- 3.0 All Health Plan employees will be trained annually on Conflicts of Interest and how to disclose, per this policy.
- 3.1 Training will be administered through Banner Learning Center as part of the annual Compliance Program training. Other training materials may be created, such as email campaigns or posters.
- 4.0 For Health Plan employees seeking outside employment, outside employment is permitted within limits. While not on official duty, you may work for a private company or organization either for pay or as a volunteer as long as it does not create a Conflict of Interest. Conflicts of Interest may not always be clear,

therefore contact your supervisor/manager or the Compliance Officer about any questions concerning outside employment and possible Conflict of Interest.

- 5.0 Health Plan employees are to report any suspected Conflict of Interest situations involving other employees to the employee's supervisor/manager or the Compliance Officer at (520) 874-2847. If the supervisor/manager or Compliance Officer is uncertain as to the presence of an actual Conflict of Interest, the Compliance Officer will consult with the Human Resources Department to assist in the final determination.
- 6.0 The Health Plan will obtain attestations from the FDRs that they have a Code of Conduct in place which contains provisions to ensure employees, managers, officers, and directors responsible for the administration or delivery of Medicare benefits are free from any conflict of interest in administering or delivering Medicare benefits.
- 6.1 Attestations will be collected by the Network Development Department as a part of the Vendor Oversight.
- 7.0 The Health Plan provides information on potential Conflicts of Interest and the Health Plan's disclosure system in the annual Health Plan general compliance training for employees, agents, board members and FDRs.
- 8.0 The Health Plan provides information on potential Conflicts of Interest and the Health Plan's disclosure system in the Code of Conduct, Compliance Guide for FDRs and can be accessed through the Compliance Webpage for FDRs.
- 9.0 The Health Plan will not undertake any work that represents a potential conflict of interest, or which is not in the best interest of Medicaid and Medicare without prior written approval.

PERFORMANCE AND OUTCOME MEASURES

- 1.0 100% of Covered Persons will annually read the Conflict of Interest policy & procedure and will have read and submitted the Conflict of Interest survey to Internal Audit.
- 2.0 100% of Health Plan employees, agents and board members will receive training on potential Conflict of Interest annually through Banner Learning Center.
- 3.0 100% of FDRs will attest to having effectively screened their governing bodies and senior leadership for Conflicts of Interest.
- 4.0 The Compliance Department will prepare an annual report on status of Conflict of Interest attestations for both the FDRs and employees and will report to the Compliance Committee. The Compliance Department obtains the employee information from the Banner Internal Audit Department.

REFERENCES

- 1.0 Medicare Managed Care Manual – Chapter 21; Section 50.3.1
- 2.0 Prescription Drug Benefit Manual, Chapter 9, Section 50.2.1.2
- 3.0 AHCCCS Contract, Section E, Paragraph 12

ASSOCIATED POLICIES AND PROCEDURES

- 1.0 Banner Corporate Policy – 2794 Conflicts of Interest
- 2.0 Health Plan Policy - CP 6001 Compliance Program
- 3.0 Health Plan Policy - CP 6023 Code of Conduct
- 4.0 Health Plan Policy CP 6221 Compliance Officer Responsibilities

ATTACHMENTS

N/A