


<p>DEPARTMENT: Compliance</p> <p>POLICY TITLE: CMP10 Conflict of Interest</p>		
<p>REVIEWED BY: AZPC Compliance Officer</p>	<p>REVIEW DATE: 11/08/2019</p>	<p>EFFECTIVE DATE: 12/01/2019</p>
<p>APPROVED BY: Compliance Committee</p>	<p>APPROVAL DATE: 11/11/2019</p>	

PURPOSE:

To ensure that Heritage Provider Network (HPN) Arizona Priority Care (AZPC) employees, Senior Management, and the Board of Directors act honestly and ethically, and avoid potential and actual conflicts of interests (COI).

POLICY:

It is HPN and AZPC’s policy to require that all employees, Senior Management, and the Board of Directors demonstrate business standards that are consistent with the highest moral, ethical and legal obligations. This practice of professionalism includes ensuring that all business relationships are strictly formed for the sole purpose and interest of AZPC. HPN and AZPC have established this policy to enforce these standards and to ensure that no conflict of interest exists.

PROCEDURE:

1. A COI occurs when an employee, a supervisor or senior level management exploits professional or official capacity in some way for personal gain, in terms of money or other material advantage, at the expense of the employer or organization. Conflicts of interest may include but are not limited to using one’s position in the organization to receive a benefit, a payment or gift (including entertainment) or to refer business to or improperly benefit a friend or relative.
2. It is the employee’s obligations to ensure that he or she remains free of COI in the performance of his or her responsibilities at AZPC. The interests of the organization must be the first priority in all decisions and actions.
3. If the employee has any question about whether an activity might constitute a COI, the employee should consult with the Compliance Officer, company Legal Counsel, Board of Directors, company CEO and/or refer to the appropriate policies for direction before pursuing the activity.
4. Upon disclosure or discovery of any actual, potential, or apparent COI, the Compliance Officer, Corporate Compliance Officer, Internal Counsel, or Board of Directors will review for mitigation and/or resolution as appropriate, and as according to AZPC policy and other regulatory requirements. This may include reevaluating or modifying the working relationship, up to and including termination.

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5. Employees, Senior Management, and the Board of Directors are educated about COI during New Hire Orientation and annually thereafter during Compliance Training.
6. Annually, or as deemed necessary, Senior Management, the Board of Directors are required to review and attest to the COI policy.

DEFINITIONS:

None

REFERENCES:

Heritage Provider Network Policies
Medicare Managed Care Manual, Chapter 21

APPENDICES:

None

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DOCUMENT REVISION LOG

Date	Document Modification (including deletions)	Page(s)	Location
11/2019	Transfer to AZPC template	All	All