



Date Issued: 9/13

Date Reviewed and/or Revised: 6/25

**REGION 10 PIHP**

<b>SUBJECT</b> Conflict of Interest		<b>CHAPTER</b> 01	<b>SECTION</b> 02	<b>SUBJECT</b> 03
<b>CHAPTER</b> Administrative		<b>SECTION</b> Compliance		
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**I. APPLICATION:**

- ☒ PIHP Board      ☒ CMHSP Providers      ☒ SUD Providers  
☒ PIHP Staff      ☒ CMHSP Subcontractors

**II. POLICY STATEMENT:**

It shall be the policy of the Region 10 PIHP that all employees of the PIHP or of its provider network have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest.

**III. DEFINITIONS:**

Conflict of Interest: Any situation in which financial or other personal considerations may compromise or appear to compromise (1) an employee's business judgment; (2) delivery of patient care; or (3) ability for an employee to do his or her job. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Unusual Gain: Business dealings with outside entities that result in an unfair advantage for those entities, this organization or an employee or provider network. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee or both. Certain nominal benefits are allowed in accordance with other policies.

**IV. STANDARDS:**

- A. Actual or potential conflicts of interest of PIHP staff must be disclosed to the PIHP Board, appropriate PIHP management personnel, human resources, or the PIHP's Corporate Compliance Officer.

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- B. Any Regional employee must seek guidance and approval from appropriate management personnel prior to pursuing any business or personal activity that may constitute a conflict of interest.
- C. Any Regional employee needs to be mindful of the illusion impropriety gifts and favors may pose.
  - 1. Gifts of entertainment from vendors should be limited to common business courtesies which may include an occasional lunch, dinner, or gift of limited value. Monetary gifts/favors in an attempt to gain an unfair financial and/or personal advantage over outside entities are strictly prohibited.
  - 2. Employees may not promise gifts, entertainment, or political alliances to gain/maintain members or unfair business advantage.
  - 3. All enticements are subject to "Fair Market Value" if the PIHP Provider is furnishing the designated health service.
- D. Business courtesies that would influence or appear to influence an employee in the conduct of their duties or responsibilities must be declined.
- E. Any PIHP employee is prohibited from being employed or contracted with one of their subcontractors, network providers, or providers.

**V. PROCEDURES:**

The PIHP and Providers shall:

**Corporate Compliance Designee:**

- A. Reviews all actual or potential conflicts of interest that come to the attention of management.

**Staff/Contract Providers**

- B. Disclose to the Corporate Compliance Office any actual or potential conflicts of interest that come to their attention.
- C. Seek approval from appropriate management prior to entering into any business arrangement that may create a conflict of interest.
- D. Report any gifts, favors or consideration received from any provider, vendor or organization that may violate this policy.

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VI. **EXHIBITS:**

None.

VII. **REFERENCES:**

None.