

Document Number:	CP03
Document Name:	Conflict of Interest
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1.0 Purpose

Coherent has adopted this policy in compliance with 42 C.F.R. §§ 422.503(b)(4)(vi)(C), 423.504(b)(4)(vi)(C) which requires Health Plans to ensure that FDRs have addressed potential conflicts of interest with employees, Associates and downstream entities.

Coherent has established this policy and associated Attestation document to meet this compliance requirement.

This policy applies to:

1. All Coherent employees working directly or indirectly with Medicare Advantage Membership.
2. All Consultants/Business Associates working with or for Coherent on projects involving Medicare, Medicaid or other Membership.
3. All Coherent Downstream Entities, including the Provider Network.

2.0 Related Policies

1. CP00_Coherent Compliance Program

3.0 Policy Owner

The Coherent Compliance Officer is responsible for ensuring the policy is revised to include CMS modifications as required. The Compliance Officer will have the policy updated within 30 days of notification that there is a need for revision.

It is the responsibility of all Coherent associates to maintain business operations and relationships in a manner consistent with this Policy.

DEFINITIONS:

Conflict of Interest: When an Associate's personal interest or activities may influence his/her judgment in the performance of his/her duties towards the Company.

Immediate Family Members: An Associate's spouse, parents, children, siblings and anyone who shares his/her home.

Affiliated Organization: Any corporation or organization of which an Associate is a board member, an officer, a partner, manager or employee, or in which an Associate is, directly or indirectly, a debt holder or the beneficial owner of any class of equity securities; or

Financial Interest: if the person has, directly or indirectly, through business, investment, or immediate family member has ownership or potential investment in an entity with which the Companies have or are negotiating a transaction or arrangement.

4.0 Procedure

Procedure (Duty to Disclose):

1. Disclosure of a conflict of interest shall be made to the Compliance Officer, or, in the case of board members, to Corporate Counsel. Where approval is required, such approval shall be sought, in writing, from the individuals mentioned above. In the event a mitigating plan is created to address/remedy the conflict of interest, this plan shall be approved in writing by both the Compliance Officer and Corporate Counsel.
2. Disclosures, approvals, and rejections shall be documented in writing and a copy shall be kept by the Associate as well as the individual to whom the disclosure was made.
3. Should an Associate feel that an approval has been denied unfairly, he/she may contact the Compliance Officer.
4. Disclosure and, if applicable, approval are always required prior to engaging in the conduct in question. Any material changes to the disclosed/approved conflicts shall also be subject to renewed disclosure/approval.
5. Officers, employees, contractors, and FDRs are requested to disclose all actual or potential conflicts of interest within thirty (30) days of the commencement of employment or at the time of contracting, and annually thereafter. FDRs must also obtain and attest that it has obtained conflict of interest statements from its directors and employees, volunteers, and consultants at the time of contracting and at least annually. Board members shall disclose any actual or potential conflicts of interest at the time of appointment to the Board of Directors, and annually thereafter. All Associates shall complete a Conflict of Interest Attestation (Attachment B)
6. The Compliance Department shall be responsible for maintaining the Conflict of Interest Attestations.
7. If, at any time throughout the year, an Associate assumes or becomes involved in any activity that might be perceived as a potential Conflict of Interest, the Associate is responsible for disclosing that Conflict of Interest to the Compliance Officer, or Corporate Counsel. Failure to disclose a potential conflict of interest will subject associate to disciplinary action in accordance with the organization's Correction Action Plan.

Policy / Procedure

- 8. All Associates will be informed and educated, via the Coherent Conflict of Interest Policy and Standards of Conduct, of their ongoing duty to disclose and update information related to potential Conflicts of Interest

5.0 Exhibits / Appendices / Form

Form CP03 – Conflict of Interest Attestation.

6.0 References

42 C.F.R. §§ 422.503(b)(4)(vi)(C), 423.504(b)(4)(vi)(C)

7.0 Document History

Revision Date	Reason for Revision:	Revised by:
5/1/18	Original	A. Gable