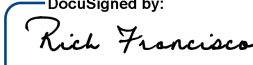




Policy Title: Provider Conflict of Interest	Policy and Procedure #: 10-005	<u>Review Dates</u>	
Category: Provider Network Subject: To ensure, no undisclosed conflict of interest exists in any contractual relationship entered into by HealthWest. It is important for HealthWest directors, officers, and staff to be aware that both real and apparent conflicts of interest or dualities of interest sometimes occur in the course of conducting the affairs of the agency and that the appearance of conflict can be troublesome even if there is in fact no conflict whatsoever. Conflicts are undesirable because they potentially or eventually place the interests of others ahead of the corporation's obligations to its purposes and to the public interest. The policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to government organizations.	Prepared by: Name: Jackie Farrar Title: Provider Network Manager Approved by: DocuSigned by:  AAZFBDA8ABBD04A3 Rich Francisco, Executive Director	07/24/2025	
		06/17/2026	
	Effective Date: 12/27/2001	Last Revised Date: 04/03/2024	

I. POLICY

It is the policy of HealthWest to assure all contracted Providers disclose actual and potential conflict of interest and, when actual or potential conflict of interest is identified, assure affected contracted Provider will refrain from further participation in matter(s) to which the conflict relates until the question of conflict has been resolved.

II. APPLICATION

All contracted Providers of HealthWest.

III. DEFINITIONS

Conflict of Interest: All business interests, affiliations, and/or relationships which could have an existing or potential financial or other interest which impairs or might appear to impair that person's independent unbiased judgement when performing responsibilities to HealthWest.

Interested Person: Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

Financial Interest: A person has a financial interest if the person has, directly or indirectly, through business, investment, or family: a. An ownership or investment interest in any entity with which the Organization has a transaction or arrangement, b. A compensation arrangement with the Organization or with any entity or individual with which the Organization

has a transaction or arrangement, or c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

IV. PROCEDURE

- A. HealthWest Contracts Department staff will ensure contract requirements include disclosure of conflict of interest at the time of Provider application/re-application.
- B. HealthWest Administrative staff will:
 - 1. Review contract provider disclosure statements, and if a conflict is found,
 - 2. Obtain Executive Director and/or Corporate Counsel recommendation for disposition.
 - 3. If it is determined a Conflict of Interest exists, Executive Director with the assistance of Corporate Counsel will decide whether the partnership can occur with an alternative arrangement or should be denied. This determination decision will occur in writing by Executive Director.

Authors Initials JF/hb