

Title: CMA Conflict of Interest for Committee Members

Policy Number: CMA 23

Department/Owner(s) CMA - Heather Murphy, Sheila Worth

Creator(s): Sheila Worth

Original Effective Date: 07/01/2025

Last Revision Date: 07/01/2025

Reviewer(s): Billie Bemis, Heather Murphy, Erica Anderson

Approved by/Title: Billie Bemis, VP, LTSS

Approval Date: 06/05/2025

Signature: 

1.0 Acronyms & Definitions

- 1.1 **Conflict of Interest:** Any situation where a committee member or their family might benefit personally from a decision involving RMHP. This includes having:
 - 1.1.1 A contract or business deal with RMHP.
 - 1.1.2 A financial interest in a company doing business with RMHP, especially if the member or their family holds a role like director, employee, or legal representative in that company.
- 1.2 **Contract or Business Deal:** Any kind of agreement or business relationship involving money, goods, services, loans, grants, or control over another organization.
- 1.3 **CMA:** Case Management Agency
- 1.4 **Family Member:** A spouse, partner, parent, child, or stepchild of a committee member.
- 1.5 **Individual:** A person who does not have Medicaid but is enrolled in a program managed by the CMA.
- 1.6 **Committee Member:** Anyone serving on an RMHP CMA committee or council.
- 1.7 **Financial Interest:** A financial interest that is big enough to possibly influence someone's decisions in matters involving RMHP.
- 1.8 **Member:** A person with Medicaid who also has a waiver or program managed by the CMA.

2.0 Purpose

- 2.1 To help ensure the integrity of the services, supports, and programs provided by the CMA.
- 2.2 To protect against conflicts of interest.

3.0 Applicability

- 3.1 **Line(s) of Business/Program(s):** CMA
- 3.2 **Department(s):** CMA
- 3.3 **Regulatory/Contractual Requirement(s):**

3.3.1 RMHP CMA Contract C24-186985A as amended

3.3.1.1 Section 1.12.6.

3.3.2 8.7001.C.1.q. – Member Rights

3.3.3 8.7201.F.8. – Conflict of Interest

4.0 Policy

- 4.1 RMHP CMA will work to ensure its Members and other individuals get services and supports without any conflicts of interest
- 4.2 Committee Members must avoid situations that could appear to be or actually be a conflict of interest. Committee Members:
 - 4.2.1 Cannot be involved in discussions and/or decisions regarding their own personal case.
 - 4.2.2 Cannot use the committee title for anything other than official committee business.
- 4.3 Getting Family Support or Waiver services does not automatically mean there's a conflict of interest for Committee Members.
- 4.4 Committee Members cannot use their official titles (e.g., FSC Council Member, FSC Co-Chairperson, or CAC Committee Member) for personal benefit or business.
- 4.5 Committee Members must keep confidential information private, especially anything related to conflicts of interest. They must not use this information for personal gain or to benefit their family members.

5.0 Responsibilities

5.1 Committee Members

- 5.1.1 Committee Members are responsible for abiding by this policy.

5.2 RMHP Staff

- 5.2.1 RMHP CMA staff are responsible for receiving emergency requests and determining the appropriate Committee Members that will receive requests for emergency funds.

5.3 Routine Review, Maintenance, and Communication

This policy will be reviewed (and revised where necessary) at least annually or when there is a change at the enterprise level, or a regulatory or contract change.

- 5.3.1 The policy owner(s) are responsible to:
 - 5.3.1.1 Perform due diligence to confirm that the information is accurate and compliant with any applicable regulations, contracts, and laws.
 - 5.3.1.2 Ensure the final policy is updated in other locations including training manuals, provider manuals, websites, portals, intranets, and any other locations.
 - 5.3.1.3 Communicate revised policies to appropriate health plan staff and external stakeholders, as applicable. Communication must be documented and retained with the policy. Documentation could include inclusion in meeting minutes, email communication, training attendance logs.
- 5.3.2 The Contract Lead responsible to:
 - 5.3.2.1 Update the final version of the policy in the RMHP Policy and Procedure Library.

6.0 Procedure

6.1 For FSSP emergency request decisions:

- 6.1.1 When the FSC is called upon to make a determination for an emergency request for a family and members of the family are also on the FSC, they will not be included in the email or participate in the discussion or decision regarding the request.
- 6.1.2 FSC members will not share information related to the discussion or decision regarding emergency requests, nor will FSC members engage in conversations about the request with the council member who submitted the request.

6.2 CAC or FSC Title Use

- 6.2.1 Committee Members titles (e.g., FSC Council Member, FSC Co-Chairperson, or CAC Committee Member) may only be used for official committee or council business and only when the communication has been approved by the committee or council. Such titles should not be used in email signatures.
- 6.2.2 If Committee Members are unsure of appropriate situations in which to use their title, they should ask the RMHP CMA Director or ask during a committee or council meeting.

6.3 Policy Adherence

- 6.3.1 Committee Members will review this policy annually and sign an acknowledgement.

7.0 References

N/A

8.0 Attachments/Appendices

Conflict of Interest Attestation Form

9.0 Revision History

VERSION	DATE	REVISED BY	DESCRIPTION OF CHANGES
0	06/05/2025	Sheila Worth	Initial Policy