This RAE Governance Plan Deliverable:

- Describes how RMHP will protect against any perceived conflict of interest among its governing body from influencing RMHP’s activities under its RAE Contract with the Department of Health Care Policy and Financing (the Department).

As the Region 1 RAE, RMHP serves as the licensed, contracting organization that is the single point of accountability to the Department for all facets of RAE operations and deliverables.

The key objectives of this approach are to:

- Organize the RAE model around the goals and needs of individual clients, as whole persons, with aspirations, dreams and contributions to offer to the community
- Establish the locus of leadership and decision-making firmly within a local, multi-disciplinary, multi-sector community governance model
- Achieve the deepest possible degree of integration among physical health, behavioral health and human service organizations – and ensure that resources and talent at every level are put to the most productive use possible
- Make the significant expertise, experience, technology, research and development and capital investment available within a national enterprise available to local leaders, with the autonomy required to close gaps, learn and innovate rapidly
- Establish clear, straight, lines of accountability to the Department that allow for the efficient fulfillment of all deliverables and public reporting duties, with an appropriate separation of controls, checks and balances
- Move well beyond the traditional, narrow “Behavioral Health Organization carve out” and “third party” managed care models of operation, in a framework that ensures competence and continuity without sacrificing access or transparency.

Achieving these objectives necessitates an approach that transcends outdated “delegation” concepts in managed care, as well as narrow “ownership” arrangements among a group of self-interested parties. The Region 1 approach adopts a more forward thinking and progressive model that promises to produce better results and improved outcomes for Members, Providers, Community Organizations and Stakeholders.

Additionally, a broader array of providers and community leaders, including representatives from Managed Service Organizations and other alternatively funded organizations that serve Health First Colorado Members, will be empowered to provide direction to the RAE through a community governance process.
Our RAE Governance model has been adjusted from the first contract year of the RAE based on community and stakeholder feedback. RMHP has developed a more inclusive, structured model to respond to this feedback and fully leverage the RAE councils and committees to inform and improve the delivery of services in Region 1. The following are part of this governing and advisory structure.

- **Reunion Health**: Reunion Health, an integrated service delivery entity, which is comprised of Community Mental Health Centers and Federally Qualified Health Centers operating throughout Region 1, collaborates with RMHP under a Joint Operating Agreement (JOA) charter to ensure the delivery system is optimally organized to produce whole person health.

- **Region 1 RAE Executive Partnership Board (EPB)**: This group includes executive leaders from the Community Health Alliance movement, Local Public Health and Human Services, Long Term Services and Supports and other organizations. This Board balances provider and consumer input received through other channels with community agency leadership insights and expertise. The EPB will focus on RAE initiatives and operations alignment with broader community integration, capacity building initiatives and RAE performance.

- **Member Advisory Council**: Consumers and supporting organizations, representing a diverse array of families, children, underserved communities and people living with disabilities and other special needs participate on this council to ensure that feedback is not only conveyed but incorporated into RAE policy, priorities are set and design improvements are executed throughout the RAE.

- **Clinical Assurances and Quality Improvement Committee**: This committee is comprised of representatives from Community Mental Health Centers, Federally Qualified Health Centers, Health Partnerships and providers across Region 1. This committee’s primary purpose is to develop and implement systemic approaches to whole person care and drive initiatives for performance improvement around key performance indicators and behavioral health incentive program measures.

- **Behavioral Health Independent Provider Council**: This group will include participants from independent, non-CMHC behavioral health providers including single practitioner practices, larger provider groups and Substance Use Disorder Treatment provider clinics throughout the region. *This council has been transitioned into the Behavioral Health Community Focus Groups.*

- **Behavioral Health Community Focus Groups**: These groups are convened across Region 1 and include providers, Members and community stakeholders with a focus on a Behavioral Health services, identifying gaps in care and solutions to access and availability.

- **PRIME Executive Committee**: For the Payment Reform Initiative known as RMHP Prime, which serves Health First Colorado Members in six counties in Western Colorado, RMHP also convenes a group of leaders from diverse health, consumer, business and
civic organizations to provide oversight for this initiative. This Western Colorado Executive Committee provides direction and accountability for achieving aligned local, regional, state and federal policy objectives.

- **Performance Improvement Advisory Committee (PIAC):** This committee is convened in accordance with requirements set by the Department and will participate actively in discussions with the Region 1 RAE Executive Partnership Board, Reunion Health Executive Board, the Member Advisory Council, Clinical Assurances and Quality Improvement Committee and Behavioral Health Community Focus Groups and participate in the statewide PIAC convened by the Department. This group includes voting members with representation from the following entities:
  - Community Mental Health Centers
  - Criminal justice advocacy
  - Family Resource Centers
  - Federally Qualified Health Centers
  - Health Alliances
  - Health Neighborhood Providers - Care Coordination
  - Health Neighborhood Providers - Public Health
  - Health Neighborhood Providers - Oral Health
  - Health Neighborhood Providers - Ambulance Services / Paramedics
  - Healthy Communities
  - Latino Initiatives
  - Members and Family Members (4 seats)
  - Nurse-Family Partnership
  - Private Behavioral Health Providers
  - Private Primary Care Medical Providers
  - Tribal healthcare facilities

All PIAC meetings are open to the public and participants can join at an in-person location or remotely via a web-conferencing platform. The primary purpose and focus of the Regional PIAC is to strengthen relationships across the region, share information and feedback with partners, collaboratively develop solutions to critical health issues, and prioritize our work as the RAE. Being an open forum to exchange information to drive and inform improvement of health care delivery across Region 1, the RMHP PIAC seeks to be inclusive, open to feedback and guided by stakeholders and Members in the Region 1 community.

**RMHP’s approach to managing conflicts will include the following steps:**

- **Duty to Disclose** – All governing committee members of the RAE will be required to complete an annual conflict of interest disclosure form. However, this annual disclosure does not relieve these individuals of the responsibility to report actual and apparent conflicts of interest as soon as they become aware of the conflict.

- **Evaluation of Conflicts of Interest** – The Executive Committee will manage conflicts of interest. After disclosure of the conflict and all material facts, and input is received from
legal counsel and the person making the disclosure, he or she will leave the committee meeting while the determination of a conflict of interest is discussed and voted upon.

- **Procedures Addressing a Conflict** – If a conflict is determined to exist, the Executive Committee will decide how it will be addressed. This may include permitting the conflicted individual an opportunity to participate in a discussion of the issue, but not allow them to vote, or excluding them entirely from the discussion as well as the vote.

- **Violations of the Conflict of Interest Policy** – If a committee member is believed to have failed to disclose a conflict, the member will be afforded an opportunity to explain the alleged failure to disclose. If, after hearing the committee member’s response and making such further investigation as may be warranted in the circumstances, the Executive Committee determines that the member has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action up to and including termination of employment and/or participation in the RAE.

The Conflict of Interest plan will include language that any governing committee member is required to immediately disclose any conflict or apparent conflict to the Executive Committee, where it will be determined how the conflict or apparent conflict is to be resolved. We believe many actual and apparent conflicts of interest can be resolved if the conflict is reported before it creates the appearance or reality of having influenced the judgment of the potentially conflicted individual.

Any action taken by the Executive Committee to resolve a conflict of interest, whether actual or perceived, will be documented and reported to the full membership of both committees.