

Denver Health Medical Plan
Medicaid Choice
Governance Plan

Denver Health Medicaid Choice (DHMC) Governance Plan

5.5.1. Describes how the Contractor will protect against any perceived conflict of interest among its governing body from influencing the Contractor's activities under this Contract.

5.5.1.1. The Contractor shall include as conflicts of interest any party that has, or may have, the ability to control or significantly influence a Contractor, or a party that is, or may be, controlled or significantly influenced by a Contractor.

5.5.1.2. The Contractor shall ensure that conflicts of interest include, but are not limited to, agents, managing employees, persons with an ownership or controlling interest in the Contractor and their immediate families, members of the governing body, subcontractors, wholly-owned subsidiaries or suppliers, parent companies, sister companies, holding companies, and other entities controlled or managed by any such entities or persons.

5.5.2. Is posted publicly on the Contractor's website.

Conflicts of Interest

The members of the DHMC board do not have any perceived conflicts of interest based on the description above from the DHMC contract. Furthermore, DHMC mitigates any perceived conflicts of interest through the governing board as well as through the governing committees and stakeholder committees. The multilayer governing and advising structure fosters accountability throughout the organization.

Identifying and Resolving Conflict/s of Interest

DHMC upholds a strict Code of Business Conduct and Ethics, which obligates us to comply with all applicable laws, rules, and regulations related to operations. To uphold the Code, DHMC acts in an honest manner at all times; reports any suspected or observed misconduct, including violations of law, policy, or procedure; makes a full and timely disclosure of any situation that may result in a conflict of interest or the appearance of a conflict; conducts ourselves in a manner that avoids actual or apparent conflict of interests to protect our business reputation and integrity of the program; and not accept gifts, payments, fees, services, discounts, valuable privileges, or other favors that may appear to improperly influence performance of duties. DHMC also mandates that vendors, Contractors, and Subcontractors comply with the Code.

DHMC maintains a conflict of interest policy and furthermore, has created procedures to make sure that all employees act in the best interest of our organization and to avoid conflicts. DHMC's commitment to compliance spans the entire organization. As soon as we learn of any potential conflict of interest or deficiency — whether identified by us, the Department, Providers, or another party — we will investigate the root cause and take action to mitigate the conflict and prevent recurrence. The Compliance team researches and investigates potential occurrences to determine if a conflict exists and take appropriate steps to resolve them. DHMC will immediately report any identified conflicts to the Department. DHMC embraces

transparency, open communication, and continued dialogue across our organization and with the Department so we can continue to meet the expectations of the Department, Providers, and Members we serve.

The DHMC Board of Directors

The Board of Directors at DHMC are a multidisciplinary group that are dedicated to continuing the mission of providing affordable, high quality healthcare coverage for all, in partnership with Denver Health. Their combined experience serving the physical health needs of the Medicaid population is extensive and imperative to the success of DHMC. The Board is responsible for monitoring and overseeing DHMC and the Medicaid Contract, making sure DHMC adheres to legal and ethical standards and drives DHMC goals.

Names of DHMC Board of Directors:

Chair- Carla Elam-Floyd

Vice Chair- Simon Hambidge, M.D.

Treasurer- Peg Burnette

Secretary- Carol Lewis

Member- Rus Heise

Member- Sterling Crowe

Member- Joan Henneberry, MS

Member- Helen Atkinson, Esq.

Member- Open Position

DHMC does have one open member position after the recent departure of one of the board members. This position is in the process of being filled.