**Policy and Procedure**

| | | |
|---|---|---|
| **Policy Name:** Workforce Member Conflict of Interest | **Policy:** CMP-219 | **Version:** 3 |
| **Author Department:** Compliance | **Origination Date:** 12/1/2024 | |
| **Business Units Impacted:** All | **Date Last Reviewed:** 10/16/2026 | |
| **Products/LOBs:** RAE/CHP+ | **Date Approved by CPT:** 10/28/2026 | |

**DEFINITIONS:**

**Board or Advisory Group Participation:** The involvement of a Workforce Member as a member of a board, advisory group, or similar entity for a company, nonprofit organization, or government entity.

**Conflict of Interest:** A situation in which a Workforce Member's personal, financial, or other interests may interfere with their ability to make impartial decisions in the best interests of Colorado Access (COA).

**Close Personal Relationship:** A current or past relationship between Workforce Members that goes beyond a casual acquaintance or friendship. Examples include, but are not limited to, romantic partnerships, shared living situations (e.g., roommates), or other relationships that could create a real or perceived advantage or disadvantage for an employee in the workplace.

**Disclosure:** The act of formally notifying COA, usually through a written form, about a potential Conflict of Interest, outside employment or activity, or relationship that could impact job responsibilities.

**Family Member:** For the purposes of this policy, family members include:

- Spouse or domestic partner
- Parents, siblings, and children (biological, step, foster, or adopted)
- Grandparents and grandchildren
- Aunts, uncles, nieces, and nephews
- In-laws and cousins
- Individuals with whom the employee has a custodial or dependency relationship
- Individuals living in the same household as the employee

**Financial Interest:** A financial interest includes any form of income, remuneration, investments, or ownership interests exceeding 5% of the total interest in an entity. However, this definition excludes stocks, bonds, and other securities traded on national exchanges, mutual funds, and certificates of deposit or other depository accounts held at financial institutions. Financial interests also encompass both direct and indirect interests, including those held by an employee's immediate family members or business partners.[1]

**Outside Employment:** Any employment, consulting, or business activity that an employee engages in outside of their position at COA. This includes work for other employers, freelance work, or independent business operations.

[1] CHP+ Contract § 2.1.82, Ownership or Control Interest

| | | |
|---|---|---|
| **Policy Name:** Workforce Member Conflict of Interest | **Policy:** CMP-219 | **Version:** 3 |
| **Author Department:** Compliance | **Origination Date:** 12/1/2024 | |
| **Business Units Impacted:** All | **Date Last Reviewed:** 10/16/2026 | |
| **Products/LOBs:** RAE/CHP+ | **Date Approved by CPT:** 10/28/2026 | |

**Podcasts**: Audio or video content published through platforms including, but not limited to Spotify, Apple Podcasts, or YouTube.

**Social Media**: This includes a blog, which is defined as a personal journal published on the worldwide web. It also includes a Wiki, which is defined as a website where users can add, modify, and or delete its contents freely and is available for others to read and consume. This also includes a social network, which is defined as a platform that allows the individual to make available information to other individuals that may or may not have their own social network including, but not limited to, Facebook, Twitter, LinkedIn and Instagram.

**Supervisory Responsibility:** The authority to make decisions or provide direction over another employee's work, including hiring, performance evaluations, promotions, and disciplinary actions up to and including termination.

**Workforce Members**: Individuals who have a professional relationship with COA or any of its affiliate entities, including full-time and part-time employees, temporary staff, contractors, volunteers, interns, and other personnel who perform work on behalf of COA or any of its affiliate entities.

**SCOPE:**
This Conflict of Interest policy applies to all Workforce Members and encompasses all activities, relationships, and transactions that may present a potential, actual, or perceived conflict of interest. This includes, but is not limited to, outside employment, personal financial interests, board or advisory group participation, relationships with vendors or suppliers, working with family members, social media and podcast activities and any other situation that could compromise, or appear to compromise, the impartiality and integrity of decision-making in the best interests of COA.

**PURPOSE:**
The purpose of this policy is to establish clear standards for the conduct of Workforce Members concerning Conflicts of Interest at COA.

**STATEMENT OF POLICY:**
COA is committed to confirming that all Workforce Members act with integrity, impartiality, and in the best interests of the organization. Workforce Members are expected to avoid any actual, potential, or perceived conflicts of interest that could compromise, or appear to compromise, their judgment and the decisions they make on behalf of COA. Personal relationships, outside employment and activities, or financial interests must not influence, or appear to influence, COA's business decisions or Workforce Member conduct. All Workforce Members must disclose any personal interests, relationships, or outside employment and activities that could create a Conflict of Interest with their professional responsibilities. COA prohibits any actions by employees that could result in personal

gain at the expense of COA's objectives, mission, or reputation. COA will take appropriate steps to review, address, and mitigate any conflicts that may arise to confirm that all actions and decisions are transparent, ethical, and in alignment with COA's mission and values.

**PROCEDURES:**

**A. Outside Employment**

1. Employees may engage in Outside Employment or business activities provided:
   a. The activities do not interfere with their ability to perform their COA job duties.
   b. The activities do not pose a conflict of interest with COA, such as competing with COA services or impacting the Workforce Member's ability to make impartial decisions on behalf of COA.
2. Workforce Members must immediately disclose any Outside Employment to their supervisor or manager and the Compliance Department.
3. The Compliance Department will assess the situation and notify the Workforce Member if a conflict exists.
4. If a conflict exists, the Workforce Member may continue the activity while working with management to find a solution to manage the conflict.
5. If a solution to manage the conflict is not found the Workforce Member must cease the Outside Employment.

**B. Social Media and Podcast Activities**

1. Employees engaging in social media or podcast activities that intersect with their role at COA must ensure that their actions do not conflict with the interests of the organization.
2. Any promotional or commercial content that could reasonably be viewed as conflicting with COA's business interests must be disclosed.
3. Employees are prohibited from using company resources to promote personal or external interests on social media or podcasts.
4. Employees must seek guidance from the Compliance Department if there is uncertainty regarding a potential conflict.
5. If a solution to manage the conflict is not found the Workforce Member must cease the activity.

**C. Board and Advisory Group Participation[2]**

1. Workforce Members are encouraged to participate in for-profit or non-profit boards or advisory groups for other companies.

[2] RAE Contract § 9.C, Disclosure to the State

2. Workforce Members must disclose participation on any board or advisory group to the Compliance Department, especially if the organization has, or could have, business dealings with COA.
3. Participation must not create a conflict with the Workforce Member's role at COA, such as competing interests or undue influence over COA decisions.
4. Participation must be outside of working hours so that it does not interfere with their obligations and duties within COA.
5. Employees must not participate in discussions or decisions on behalf of COA where there is a Conflict of Interest.
6. The Compliance Department evaluates the disclosure for potential or actual conflicts and provides a recommendation for managing the conflict as appropriate.
7. If necessary, the employee may be required to recuse themselves from certain board or advisory group activities that present a conflict.

**D. Working with Family Members**

To uphold a fair and impartial hiring process, COA aims to prevent any actual or perceived conflicts of interest that may arise when working with family members. Therefore, the following applies:

Employees must not directly hire or supervise family members.

1. Employees must disclose to the Compliance Department and Human Resources if a family member applies for a position within COA or if a familial relationship develops during employment.
2. Human Resources in collaboration with the Compliance Department will assess the relationship and determine if a conflict exists.
3. If necessary, Human Resourceswill reassign Supervisory Responsibilities or adjust the reporting structure to eliminate potential conflicts.

**E. Close Personal Relationships**

Close Personal Relationships are current or past connections between employees that exceed casual interaction, such as romantic partners, roommates, or family members. While not inherently problematic, these relationships may create a real or perceived advantage or disadvantage to an employee in the workplace. Employees are required to disclose such relationships to ensure transparency and maintain a fair workplace.

1. Workforce Members should not have a direct reporting relationship or be involved in employment decisions (e.g., hiring, promotions, performance evaluations or work assignments) with someone they have a Close Personal Relationship with. Workforce Members must disclose any Close Personal Relationships with department leaders and the

Compliance Department that may present a real or perceived advantage or disadvantage for an employee in the workplace.

2. The Compliance Department and Human Resources will review disclosures and may require adjustments in work assignments to mitigate real or perceived conflicts of interest.

**F. Financial Interest**

1. Workforce Members must not have any financial interest in or relationships with vendors, suppliers, competitors, or contractors of COA that could influence their professional decisions or actions.[3]
   a. As required by applicable state and federal laws, regulations, and contractual obligations, COA may be required to disclose ownership, control, and conflict-of-interest information to government agencies and oversight entities.
2. Workforce Members are prohibited from accepting gifts, favors, or any form of compensation from external parties that may influence, or appear to influence, their decision-making. For additional information, please refer to the CMP-216 Gifts, Meals & Entertainment policy.
3. Workforce Members may not use their position at COA to personally benefit from any business transactions or opportunities arising from their work.
4. Workforce Members with an actual, potential, or perceived conflict of interest must recuse themselves from vendor selection, procurement, contracting, credentialing, utilization management, appeals, or other decision-making processes where their impartiality could reasonably be questioned.[4]

**G. Disclosure Requirement[5]**

1. Workforce Members must complete a Conflicts of Interest Disclosure Form at new hire and annually thereafter as part of the organization's annual conflict-of-interest attestation process, identifying any existing or potential conflicts, including but not limited to Close Personal Relationships, Outside Employment, Financial Interests, Board and Advisory Group membership, or any other circumstances covered in this policy.
2. If new conflicts arise during the year, Workforce Members must promptly report them to their supervisor and the Compliance Department.
3. COA will assess disclosures and implement appropriate measures to mitigate conflict.
4. Failure to disclose conflicts may lead to disciplinary action, up to and including termination.

[3]Contract §§ 9.A-9.C, Conflicts of Interest)
[4] RAE Contract §§ 9.A-9.C, Conflicts of Interest
[5] RAE Contract § 9.C, Disclosure to the State

| | | |
|---|---|---|
| **Policy Name:** Workforce Member Conflict of Interest | **Policy:** CMP-219 | **Version:** 3 |
| **Author Department:** Compliance | **Origination Date:** 12/1/2024 | |
| **Business Units Impacted:** All | **Date Last Reviewed:** 10/16/2026 | |
| **Products/LOBs:** RAE/CHP+ | **Date Approved by CPT:** 10/28/2026 | |

**H. Confidentiality and Support Around Disclosure**

1. COA is dedicated to managing conflicts of interest disclosures with discretion, fairness, and professionalism. The intent of disclosure is preventive rather than disciplinary, enabling the organization to take appropriate measures to address potential, actual, or perceived conflicts of interest.

**I.** All disclosures will be treated confidentially and shared only with those responsible for assessing and managing potential impacts. Workforce Members who disclose in good faith are protected from retaliation. Typically, practical adjustments, such as modifying supervisory or evaluative responsibilities can be implemented to maintain objectivity and prevent misunderstandings. COA's commitment is to foster an inclusive and respectful workplace where employees feel supported in acting with integrity.

**J. Training and Awareness**

1. COA will provide annual training on Conflict-of-Interest policies and processes to ensure Workforce Members understand their responsibilities.

**K. Governance and Conflict of Interest Management Requirements**[6]

1. COA will maintain a written Governance Plan that describes how it will protect against any perceived conflict of interest among its governing body from influencing its activities under its contracts with the State.

2. **Identification of Conflicted Parties**[7]
   The following parties shall be included as conflicts of interest if they have the ability to control or significantly influence COA, or are controlled or significantly influenced by COA:
   - Agents
   - Managing Workforce Members
   - Persons with an ownership or controlling interest and their immediate families
   - Members of the governing body or Board
   - Subcontractors
   - Wholly owned subsidiaries or suppliers
   - Parent companies
   - Sister companies
   - Holding companies
   - Other entities controlled or managed by any of the above

[6] RAE Contract, § 5.6 – 5.8.2, CHP+ Contract § 5.6
[7] RAE Contract §§ 5.6-5.8.2; CHP+ Contract § 5.6; CHP+ Contract §§ 2.1.82 and 2.1.110)

| | | |
|---|---|---|
| **Policy Name:** Workforce Member Conflict of Interest | **Policy:** CMP-219 | **Version:** 3 |
| **Author Department:** Compliance | **Origination Date:** 12/1/2024 | |
| **Business Units Impacted:** All | **Date Last Reviewed:** 10/16/2026 | |
| **Products/LOBs:** RAE/CHP+ | **Date Approved by CPT:** 10/28/2026 | |

3. **Public Posting**
   COA will post the Governance Plan publicly on its website.

4. **Annual Submission and Updates**
   COA shall submit the Governance Plan to the Department of Health Care Policy and Financing (HCPF) for annual approval, with the initial submission due no later than thirty (30) calendar days prior to the contract start date and subsequently on June 1 each year. Any amendments to the Governance Plan or newly identified governance changes must be reported within thirty (30) days of discovery.

**L. Record Retention**[8]

1. All disclosed conflicts and the Compliance Department's recommendations will be documented and securely stored for audit purposes in accordance with CMP-210 Record Retention and Destruction policy.

**M. Annual Review**

1. This policy will be reviewed annually and updated as necessary to ensure compliance with applicable laws, regulations, and contractual requirements.

**REFERENCES:**
CMP-210 Record Retention and Destruction
CMP-216 Gifts, Meals and Entertainment
RAE Contract § 9, Conflicts of Interest
RAE Contract § 7, Contractor Records.
CHP+ Contract § 2.1.82, Ownership or Control Interest
CHP+ Contract § 2.1.110, Subcontractor

**ATTACHMENTS:**
None

**POLICY HISTORY:**

**SUMMARY OF REVIEW/REVISION/APPROVAL DATES:**
Version 1: 12/19/2024: Version 2: 06/12/2025, Version 3: 10/28/2026 Annual review minor updates

[8]RAE Contract §7 and Exhibit B-3 §§14.8.8-.9; CHP+ Contract Exhibit B-7 §15.10.10

**Policy and Procedure**

| | | |
|---|---|---|
| **Policy Name:** Workforce Member Conflict of Interest | **Policy:** CMP-219 | **Version:** 3 |
| **Author Department:** Compliance | **Origination Date:** 12/1/2024 | |
| **Business Units Impacted:** All | **Date Last Reviewed:** 10/16/2026 | |
| **Products/LOBs:** RAE/CHP+ | **Date Approved by CPT:** 10/28/2026 | |

**APPROVAL BODY:** Core Policy Team **APPROVAL DATE:** 10/28/2026