

Cherokee Indian Hospital Authority



The Mission of the Cherokee Indian Hospital is to be the provider of choice for the community by providing accessible, patient and family centered quality healthcare with responsible management of the Tribes resources.

TITLE: CIHA Conflict of Interest Policy

REVIEWED AND APPROVED BY: CIHA Executive Committee

EFFECTIVE DATE: 2/25/2021

LAST REVIEWED: 4/5/2024

POLICY OWNER: CIHA Executive Director of Quality/Patient Safety and Compliance Officer

PURPOSE:

Cherokee Indian Hospital Authority (CIHA) and its division the Eastern Band of Cherokee Indians (EBCI) Tribal Option believe that all health care services and supports belong to the people. CIHA and EBCI Tribal Option are stewards of this health care, safeguarding it and providing it to patients/Members when and how they need it. The purpose of this Policy is to be free and to appear to be free from the influence of any interest that conflicts with that of the Hospital and to deal with third parties, including, without limitation, suppliers, customers, contractors and all others, solely on a basis that is in the best interest of the Hospital, without favor or preference to any third party based on personal or other considerations. The purpose is, also, to certify that the staff governed by this Policy comply with all applicable federal and state conflict of interest laws, including section 1902(a)(4)(C) of the Social Security Act (SSA), 42 Code of Federal Regulations (CFR) § 438.58, North Carolina General Statutes (N.C.G.S.) § 108A-65 and 143B-139.6C.

STAFF GOVERNED BY THIS POLICY:

This Policy applies to all:

- CIHA Workforce;
- CIHA Executive staff;

CIHA Conflict of Interest Policy

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- EBCI Tribal Option staff;
- EBCI Tribal Option Member Services staff;
- EBCI Tribal Option Provider Network;
- EBCI Tribal Option Subcontractors;
- Care Managers;
- Behavioral Health Care Managers [Behavioral Health Consultants (BHCs)];
- Other Primary Care (Nutritionists, Pharmacists, and Providers in the Integrated Care Team);
- Care Manager Extenders [Licensed Practical Nurses (LPNs)/Certified Medical Assistants (CMAs)/Other];
- Primary Care – Case Management Support (CMS).

POLICY:

EBCI Tribal Option shall adopt and follow the CIHA Conflict of Interest Policy and Procedures. It is essential that staff governed by this Policy remain independent, impartial, and free from conflicts of interest and improper influences in order to advance the interest of CIHA/EBCI Tribal Option without any gain of personal benefit. Each staff member must decide all matters on the merits alone. Even the appearance of partiality to preferential treatment is a violation of this CIHA Conflict of Interest Policy.

The Indian Managed Care Entity (IMCE) EBCI Tribal Option Contract (EBCI Tribal Option Contract) between North Carolina Department of Health and Human Services (NCDHHS) and CIHA (referred to as the NCDHHS/EBCI Tribal Option Contract) requires additional regulatory requirements and is incorporated into this CIHA Conflict of Interest Policy. The CIHA Governing Board, which serves as the Governing Board for EBCI Tribal Option, is subject to this Policy (Refer to Attachment B: CHEROKEE INDIAN HOSPITAL AUTHORITY AND EBCI TRIBAL OPTION GOVERNING BOARD CONFLICT OF INTEREST POLICY AND PROCEDURES at the end of this Policy).

The EBCI Tribal Option’s network of Primary Care Providers (PCPs) not employed by CIHA shall adopt a conflict of interest policy that meets the regulatory intent of this policy and provides the necessary protections and safeguards. This policy shall be available upon request.

EBCI Tribal Option shall undertake reasonable actions to ensure that staff governed by this Policy who have been officers or employees of the State of North Carolina (NC) and have been responsible for the expenditure of substantial amounts of federal, state, or county money under the Medicaid Managed Care or NC Medicaid programs abide by all applicable federal conflict of interest requirements in accordance with N.C.G.S § 108A-65.

Staff governed by this Policy shall not serve as legal guardian of any Member of EBCI Tribal Option. In the event that a staff member serves as a legal guardian of a Member of EBCI Tribal Option, this staff member will disclose the relationship and recuse themselves from any action directly or indirectly impacting the care and support of the individual.

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CIHA Governing Board and staff governed by this Policy shall:

- Not offer, promise, or engage in discussions regarding future employment or business opportunity with any current NCDHHS employee if such NCDHHS employee participated personally and substantially in the procurement of the NCDHHS/EBCI Tribal Option Contract or the oversight of such contract as an NCDHHS employee;
- Not promise or give a gift to any NCDHHS employee or any family member of an NCDHHS employee;
- Fully and completely disclose to NCDHHS any situation that may present a conflict of interest;
- Not undertake any work that represents a potential conflict of interest without prior written approval of NCDHHS;
- Not solicit or obtain from NCDHHS any non-public information relating to NCDHHS criteria or processes for renewal of the NCDHHS/EBCI Tribal Option Contract;
- As required by N.C.G.S § 143B-139.6C, EBCI Tribal Option shall not use a former NCDHHS employee, director, or subcontractor in the administration of its NCDHHS/EBCI Tribal Option Contract for six (6) months after such person's employment or contract with NCDHHS is terminated, if such person personally participated in the following activities:
 - The execution of the Contract for the EBCI Tribal Option PCCM entity;
 - An audit, decision, investigation, or other action affecting the EBCI Tribal Option PCCM entity and CIHA; or
 - Regulatory decisions that applied to the EBCI Tribal Option PCCM entity or CIHA.

Staff governed by this Policy may not use their position and affiliation with CIHA for personal benefit. Staff must consider and avoid not only actual conflicts but also the appearance of conflicts of interest. A conflict of interest is considered to exist in any instance where an individual's actions or activities on behalf of CIHA or EBCI Tribal Option also involve the obtaining of an improper gain or advantage to the individual or create an adverse effect on CIHA or EBCI Tribal Option. A conflict of interest can also occur when it prevents an individual from exercising due care, skill, and judgment on behalf of CIHA or EBCI Tribal Option in performance of that individual's assigned duties. Staff are to avoid engaging in any activity or practice that conflicts or appears to conflict with their job responsibilities at CIHA or EBCI Tribal Option.

Staff governed by this Policy will not solicit or accept personal gifts, favors, loans, cash, uncompensated services, or other types of gratuities or hospitality from organizations doing business with CIHA, competitors of CIHA, co-workers, patients and families of patients, or referral sources. However, it does not violate this standard to accept culturally appropriate gifts from patients or their families, which would be considered rude to reject, so long as the patient or family is not doing business with the Hospital. Staff shall adhere to *CIHA Personnel Manual, Gifts and gratuities Section 4.27* (or subsequent revisions) for the initial guidance regarding gifts.

Health care providers and EBCI Tribal Option have a unique trust relationship with their patients and Members, and thus, staff governed by this Policy shall not participate in any activity that would jeopardize patient's/Members' trust in CIHA or EBCI Tribal Option. No staff should offer or give

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anything of value to any person (including patients or EBCI Tribal Option Members) that influences or appears to influence the objective judgment of that person. No staff should accept any payment that induces them to reduce or limit health care services and supports or influences a decision in the care management process.

DEFINITIONS:

Cherokee Indian Hospital Authority (CIHA)

An independent component unit of the Eastern Band of Cherokee Indians tribal government to oversee, supervise, and direct the operations of the Cherokee Indian Hospital and other health programs assigned to CIHA by the EBCI Tribal Council.

CIHA Workforce

CIHA workforce includes all full-time or part-time CIHA staff/personnel/agents/employees (i.e., contractors, volunteers, interns, trainees, students, contract employees/workers, other third parties, guests), non-employees, and other persons/individuals whose conduct, in the performance of work for a covered entity or business associate, is under the direct control of such covered entity or business associate, whether or not they are paid by the covered entity or business associate.

Code of Federal Regulations (CFR)

A compilation of administrative laws governing federal regulatory agency practice and procedures. This includes such agencies as Medicaid, Medicare, and Indian Health Service.

Conflict of Interest

Any direct or indirect ownership, control, interest, employment relationship, business relationship, and/or participation in any facility, business entity, or activity that directly or indirectly competes or does business with CIHA or reasonably could be adverse to CIHA. The fact that an EBCI Tribal Option Member also serves as an officer, staff member, or representative of CIHA shall **not** constitute a conflict of interest.

EBCI Tribal Option

The unit within CIHA that is responsible for managing the Indian Managed Care Entity and serves as the point of contact with the Division of Health Benefits, within the NC Department of Health and Human Services.

EBCI Tribal Option Contract

The Indian Managed Care Entity Contract #30-2020-014-DHB between the North Carolina Department of Health and Human Services, Division of Health Benefits and Cherokee Indian Hospital Authority. Subsequent revisions and amendments are also included in this definition. This Contract is also referred to as the NCDHHS/EBCI Tribal Option Contract.

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EBCI Tribal Option Provider Network

Primary Care Provider (PCP) practices with whom the EBCI Tribal Option has enrolled into the Network through the execution of the PCP contract. CIHA Primary Care and satellite clinics are part of the EBCI Tribal Option Provider Network.

Favor

Any opportunity, service, accommodation, use of facility, or other benefit made available for less than fair market or normal value. Seminars or training that are offered free to others or general public are not considered a favor.

Gifts

Any gratuity, favor, discount, entertainment, hospitality, loan forbearance, or other item having a monetary value. It includes services as well as training, transportation, local travel, lodgings, and meals. Seminars or training that are offered free to others or general public are not considered a favor.

Governing Board Member

Any member of the Governing Board of a facility owned, operated, or managed, directly or indirectly, by CIHA.

North Carolina Department of Health and Human Services (NCDHHS)

A Department within the North Carolina Executive Branch that is the designated single state agency with the US Department of Health and Human Services, Centers for Medicare and Medicaid Services (CMS) for the administration of the Medicaid Program through the Division of Health Benefits.

Relative

A “relative” of an EBCI Tribal Option Member shall include any spouse, parent, child, legal guardian or ward, brother, sister, grandparent, grandchild, nephew, niece, uncle, aunt, and any of the above relatives who are in-laws or step-relatives, as well as any other persons living in the same household. For purposes of staff or contractors, immediate family relationships are those as between wife/husband, spouse/partner, parent/child, sibling, mother-in-law, father-in-law, grandparent/grandchild, step-parent/step-child/foster/siblings; parent/foster child, and aunt/uncle/niece/nephew as defined in the CIHA Personnel Manual, in the current version or the subsequent revisions. The CIHA Manual shall apply unless federal regulation(s) require a more restrictive definition and then the federal definition shall have precedence.

Subcontractor

An entity having an arrangement with CIHA and/or EBCI Tribal Option, where CIHA and/or EBCI Tribal Option use the products and/or services of that entity to fulfill some of its obligations under the NCDHHS/EBCI Tribal Option Contract. Use of a subcontractor does not create a contractual relationship between the subcontractor and NCDHHS, only CIHA. Network primary

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care providers (PCPs) are not considered subcontractors for the NCDHHS/EBCI Tribal Option Contract.

PROCEDURE:

Upon hiring and annually thereafter, staff governed by this Policy who are part of the operations of the EBCI Tribal Option, as well as members of the Governing Board, shall review and attest to the CIHA Conflict of Interest Policy as outlined here or in the CIHA Compliance Plan.

EBCI Tribal Option shall:

- Ensure that financial considerations do not influence decisions to provide medically appropriate care by their Network providers;
- Validate that members of the Governing Board and all EBCI Tribal Option staff governed by this Policy who are licensed providers abide by their professional obligations to their patients and Members and shall not take any actions which conflict with such obligations;
- Disclose any known conflicts of interest or perceived conflicts of interest at the time they arise, as follows:
 - Disclose any relationship to any business or associate with whom CIHA, EBCI Tribal Option, or providers in the Provider Network are currently doing business with that creates or may give the appearance of a conflict of interest related to the operation of the EBCI Tribal Option or CIHA;
 - EBCI Tribal Option/CIHA certifies that it shall not knowingly take any action or acquire any interest, either directly or indirectly, that will conflict in any manner or degree with the performance of its services;
 - Disclose prior to employment or engagement by EBCI Tribal Option/CIHA any firm principal, staff member, or subcontractor, known by EBCI Tribal Option/CIHA to have a conflict of interest or potential conflict of interest;
 - The EBCI Tribal Option Director or the CIHA Executive Director of Quality/Patient Safety, who also serves as the CIHA/EBCI Tribal Option Compliance Officer, shall submit any and all notices of conflict to NCDHHS within thirty (30) calendar days of contractor becoming aware of the conflict.

Care Managers must disclose any potential conflict and disclose any “relative” relationship (as defined in the *Definitions* section of this Policy) with an EBCI Tribal Option Member assigned to their caseload. The EBCI Tribal Option Director of Nursing/Care Management for Primary Care will make every effort to consider such relationship at the point of case assignment. In the event the potential conflict is unknown and brought to the attention of the Registered Nurse (RN) Leads (Care Manager supervisors), the case shall be assigned to a neutral team. EBCI Tribal Option supports and recognizes the personal choice in selection of the Member’s Care Managers, and at any point, the Member may request a change in Care Managers. This request may be directed to the RN Leads or to the EBCI Tribal Option Member Services Manager. The request to change Care Managers will not be considered a substantial conflict and will not be subject to the reporting requirement for disclosure of conflict unless the request for change in Care Manager is not honored.

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Staff governed by this Policy shall adhere to the CIHA Personnel Policy, Sections 8.04-8.06 and subsequent modifications, regarding conflict of interest, outside work or interest, and secondary employment (Moonlighting Policy). The staff's direct supervisor shall inform the EBCI Tribal Option Director of any potential, known, or documented conflict of interest. Conflict of interest may be clear for CIHA provider activity but may present potential conflict due to EBCI Tribal Option adherence to federal regulations for Medicaid managed care. The latter shall have precedence over any decisions or disclosure notifications.

If a member of the staff governed by this Policy has a question about a conflict or potential conflict or has doubt as to the appropriateness of a gift, they should seek guidance from the CIHA/EBCI Tribal Option Compliance Officer or the CIHA Human Resources (HR) Director. These individuals will consult with the EBCI Tribal Option Director for any instances that may have a relationship with the requirements outlined in the NCDHHS/EBCI Tribal Option Contract. Notifications will occur with NCDHHS as applicable.

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**ATTACHMENT A:
Cherokee Indian Hospital Authority and EBCI Tribal Option
Conflict of Interest Disclosure Attestation**

The attached Conflict of Interest Policy and Procedures requires you to disclose all relationships and activities involving you or any of your relatives, which could give the appearance of influencing your discussion or actions as a staff member of Cherokee Indian Hospital Authority (CIHA) or the Eastern Band of Cherokee Indians (EBCI) Tribal Option.

No set of principles can cover every type of conflict of interest that may arise. This form is intended to assist you in such examination and disclosure. This list **is not exhaustive**, nor does the inclusion of any relationship listed below necessarily constitute a conflict. The idea is to disclose matters, which may raise a conflict, so that they may be evaluated.

EXAMPLES OF FINANCIAL RELATIONSHIPS AND ACTIVITIES FROM WHICH CONFLICTS MAY ARISE ON A MATTER INCLUDE:

- Contractor (hospital supplier, lease, hospital-based physician contract, service contract, consultant, directorship, subcontractor, etc.);
- Hospital customer (e.g., insurer, third-party payor);
- Other health care-related entities; competitors;
- Member or director of an Independent Practice Association (IPA) (legal entity organized and directed by physicians to negotiate contract with insurance companies on their behalf);
- Member of another governing body or board;
- Party to legal action involving CIHA;
- Leases or other real property interests;
- Ownership of one percent (1%) or more of a publicly traded company, which may be in a relationship noted above.

List actual or possible sources of conflicts on the part of you or any of your relatives. Add additional sheets if necessary. Initial “none” if applicable.

None _____

NAME _____

CIHA Conflict of Interest Policy:

Attachment A: CIHA and EBCI Tribal Option Conflict of Interest Disclosure Attestation

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I ACKNOWLEDGE THAT I RECEIVED A COPY OF, AND I AGREE TO ABIDE BY, THE ATTACHED CONFLICT OF INTEREST POLICY AND PROCEDURE. I HAVE FULLY DISCLOSED ALL RELATIONSHIPS THAT I AND ANY OF MY RELATIVES HAVE THAT, WHEN CONSIDERED IN CONJUNCTION WITH ANY CIHA POSITION, MIGHT POSSIBLY CONSTITUTE A CONFLICT OF INTEREST. I UNDERSTAND THAT FAILURE TO OBSERVE AND ABIDE BY THESE OBLIGATIONS MAY RESULT IN DISCIPLINARY ACTION, WHICH MAY INCLUDE DISMISSAL AND/OR CONTRACTUAL TERMINATION. **THE ORIGINAL OF THIS SIGNED AGREEMENT WILL BE KEPT AT THE CHEROKEE INDIAN HOSPITAL AUTHORITY POLICY REPOSITORY.**

NAME _____

SIGNATURE _____

DATE _____

CIHA Conflict of Interest Policy:

Attachment A: CIHA and EBCI Tribal Option Conflict of Interest Disclosure Attestation

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ATTACHMENT B:
CHEROKEE INDIAN HOSPITAL AUTHORITY AND EBCI TRIBAL OPTION
GOVERNING BOARD CONFLICT OF INTEREST POLICY AND PROCEDURES

Each member of the Governing Board of Cherokee Indian Hospital Authority (CIHA) has a responsibility to CIHA to be free and to appear to be free from the influence of any interest that conflicts with that of the Hospital and to deal with third parties, including, without limitation, suppliers, customers, contractors and all others, solely on a basis that is in the best interest of the Hospital, without favor or preference to any third party based on personal or other considerations. To avoid actual and possible conflicts of interest, the Governing Board requires each Member of the Governing Board promptly to disclose to the full Governing Board and CEO of CIHA each interest or influence of which he or she is aware that poses an actual or possible conflict of interest between the Governing Board Member (or any relative of that Member) and CIHA.

1. DEFINITIONS.

a. Cherokee Indian Hospital Authority (CIHA)

An independent component unit of the Eastern Band of Cherokee Indians tribal government to oversee, supervise, and direct the operations of CIHA and other health programs assigned to CIHA by the EBCI Tribal Council.

b. Conflict of Interest

Any direct or indirect ownership, control, interest, employment relationship, business relationship, and/or participation in any facility, business entity, or activity that directly or indirectly competes or does business with CIHA or reasonably could be adverse to CIHA and constitutes a conflict of interest. The fact that an EBCI Tribal Option Member also serves as an officer, staff member, or representative of CIHA shall **not** constitute a conflict of interest.

c. Governing Board Member

Any member of the Governing Board of a facility owned, operated, or managed, directly or indirectly, by CIHA.

d. Relative

A “relative” of an EBCI Tribal Option Member shall include any spouse, parent, child, legal guardian or ward, brother, sister, grandparent, grandchild, nephew, niece, uncle, aunt, and any of the above relatives who are in-laws or step-relatives, as well as any other persons living in the same household. For purposes of staff or contractors, immediate family relationships are those as between wife/husband, spouse/partner, parent/child, sibling, mother-in-law, father-in-law, grandparent/grandchild, step-parent/step-child/foster/siblings; parent/foster child, and aunt/uncle/niece/nephew as defined in the CIHA Personnel Manual, in the current version or the subsequent revisions. The CIHA Manual shall apply unless

CIHA Conflict of Interest Policy:

Attachment B: CIHA and EBCI Tribal Option Governing Board Conflict of Interest Policy and Procedures

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federal regulation(s) require a more restrictive definition and then the federal definition shall have precedence.

e. **Substantial Interest**

Ownership shall not include an investment representing less than one percent (1%) of a class of outstanding securities of a publicly held corporation.

2. **DISCLOSURE.**

Each Governing Board Member shall be required to disclose any possible or actual conflict of interest between such Member (or any relative of such Member) and the CIHA prior to his or her appointment to the Governing Board and throughout his or her term(s) immediately upon becoming aware of such possible or actual conflict of interest.

3. **POLICY.**

- a. No Member or any relative of such Member shall own any Substantial Interest in or have any personal contract or arrangement with any firm or individual doing or seeking to do business with CIHA, unless the Governing Board determines after full disclosure that such interest, contract, or arrangement will not tend to influence the action of such Member with respect to CIHA or the provision of care by CIHA.
- b. No Member or any relative of such Member shall own any Substantial Interest in or have any personal contract or arrangement with any firm or individual which competes directly or indirectly with the business of CIHA, unless the Governing Board determines after full disclosure that such interest, contract, or arrangement will not tend to influence the action of such Member with respect to the business of CIHA or the provision of care by CIHA.
- c. No Member or any relative of such Member shall seek, accept, or offer any payment, service, or gift from or to any firm or individual doing or seeking to do business with CIHA, unless the Governing Board determines after full disclosure that such payment, service, or gift will not tend to influence the action of such Member with respect to the business of CIHA or the provision of care by CIHA. This paragraph shall not prohibit acceptance or provision of ordinary social amenities.
- d. No Member shall do business on behalf of CIHA with any relative unless the Governing Board determines after full disclosure that such relationship will not tend to influence the action of such Member with respect to the business of CIHA or the provision of care by CIHA.
- e. No Member or any relative of such Member shall divert, for personal benefit, any business opportunity which the Member has good reason to know may be useful to CIHA in its ongoing businesses, unless the Governing Board determines after full

CIHA Conflict of Interest Policy:

Attachment B: CIHA and EBCI Tribal Option Governing Board Conflict of Interest Policy and Procedures

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disclosure that such opportunity is not of any interest to the hospital or the provision of care by CIHA.

- f. No Member or any relative of such Member shall do business with or enter into any transaction with CIHA, unless the Governing Board determines after full disclosure that such relationship will not tend to influence the action of such Member with respect to the business of CIHA or the provision of care by CIHA.

4. RESOLUTION OF EXISTING OR APPARENT CONFLICT OF INTEREST.

Upon being advised of a possible conflict of interest, the Governing Board shall fully discuss same and determine whether the matter disclosed represents a conflict of interest. Should the Governing Board determine that a conflict of interest exists, the Governing Board shall require the Member:

- a. To abstain from all discussions and votes on any matter to which the conflict is relevant;
- b. To immediately divest himself or herself of the actual or potential conflicting ownership control, interest, employment relationship, business relationship, or participation; and/or
- c. To resign his or her membership on the Governing Board.

EACH GOVERNING BOARD MEMBER SHALL RECEIVE A COPY OF THIS POLICY UPON ACCEPTANCE OF GOVERNING BOARD MEMBERSHIP, SIGN AN ACKNOWLEDGMENT OF RECEIPT, AND AGREE TO ABIDE BY THIS POLICY.

CIHA Conflict of Interest Policy:

Attachment B: CIHA and EBCI Tribal Option Governing Board Conflict of Interest Policy and Procedures

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**CIHA CONFLICT OF INTEREST POLICY:
POLICY IMPLEMENTATION/REVISION INFORMATION**

Original Effective Date: 2/25/2021

Revision Information:

Date	Section Updated	Change
2/11/2022	Policy Header	Added “Last Reviewed” date and added “CIHA” to Executive Committee title
2/11/2022	All sections	Checked and amended grammar, numbering, and readability as needed
2/11/2022	Definitions	Added definition for “EBCI Tribal Option Contract”
2/11/2022	Policy	Changed the title of “Director of Nursing for Primary Care/EBCI Tribal Option Director of Care Management” to “CIHA/EBCI Tribal Option Director of Care Management”
2/11/2022	Attachment B	Added “EBCI Tribal Option” to title
2/11/2022	Policy Implementation/ Revision Information	Added policy revision information table
5/25/2023	Policy Header	Added Cherokee translation and syllabary for “EBCI Tribal Option”
5/25/2023	Policy Header	Amended “Last Reviewed” date and added “Policy Owner” and identified the role
5/25/2023	All sections	Changed all instances of CIHA and EBCI Tribal Option “employees” to “staff”
5/25/2023	Purpose	Inserted language from Attachment B that expresses the purpose of this Policy
5/25/2023	Staff Governed By This Policy	Amended the “Staff Governed By” section and other applicable sections throughout the Policy with the appropriate parties
5/25/2023	Policy	Added “CIHA” to the following: EBCI Tribal Option shall not use a former NCDHHS employee, director, or subcontractor in the administration of its NCDHHS/EBCI Tribal Option Contract for six months after such person’s employment or contract with

**CIHA Conflict of Interest Policy:
Policy Implementation/Revision Information**

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		NCDHHS is terminated, if such person personally participated in an audit, decision, investigation, or other action affecting the EBCI Tribal Option PCCM entity or regulatory decision that applied to the EBCI Tribal Option PCCM entity or CIHA
5/25/2023	Definitions	Added “CFR” to the Definitions list, deleted “CIHA Employee,” and amended definitions by supplementing additional language for “CIHA,” “Conflict of Interest,” “EBCI Tribal Option Provider Network,” “NCDHHS,” “Relative,” and “Subcontractor”
5/25/2023	Policy and Procedure	Deleted all instances of “NC Health Choice”
5/25/2023	Procedure	Changed the title of “CIHA/EBCI Tribal Option Director of Care Management” to “EBCI Tribal Option Director of Nursing/Care Management for Primary Care”
5/25/2023	Procedure	Changed all instances of EBCI Tribal Option “PCP” Network to “Provider” Network
5/25/2023	Procedure	Added “CIHA” to the first three sub-bullets that follow “EBCI Tribal Option shall disclose any known conflicts of interest or perceived conflicts of interest at the time they arise, as follows...”
5/25/2023	Procedure	Corrected the title of the “EBCI Tribal Option Director of Nursing/Care Management for Primary Care”
5/25/2023	Attachment A	Changed CIHA “employee” to “staff member” and deleted “Attachment B” reference and the “NOTE THIS POLICY IS BEING SENT AS PART OF THE REVIEW PACKET FOR DHHS AND WILL NOT BE ATTACHED TO THE EBCI TRIBAL OPTION POLICY. THE OFFICAL VERSION OF THE POLICY WILL BE LOCATED IN THE CIHA POLICY REPOSITORY” because this statement only applied to when the PCDU was not functional
5/25/2023	Attachment B	Amended the “CIHA,” “Conflict of Interest,” “Member,” and “Relative” definitions

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5/25/2023	Policy Implementation/ Revision Information	Amended the policy revision information table
4/5/2024	Title and Policy Content	Combined the CIHA Conflict of Interest Policy and the EBCI Tribal Option Conflict of Interest Policy into one universal Policy, which includes applicable language and Staff Governed By from both polices
4/5/2024	Policy Header	Updated the “Last Reviewed” date
4/5/2024	All sections	Checked and amended grammar, numbering, and readability as needed
4/5/2024	Definitions	Added definitions for “CIHA Workforce” and “Governing Board Member”
4/5/2024	Procedure	Identified “members of the Governing Board” as being those that upon hiring and annually thereafter, they shall review and attest to the CIHA Conflict of Interest Policy as outlined here or in the CIHA Compliance Plan
4/5/2024	Procedure	Identified that EBCI Tribal Option shall validate “members of the Governing Board and all EBCI Tribal Option staff” governed by this Policy who are licensed providers abide by their professional obligations to their patients and Members and shall not take any actions which conflict with such obligations
4/5/2024	Attachment B	Added “and constitutes a conflict of interest” to the definition of “Conflict of Interest”

**CIHA Conflict of Interest Policy:
Policy Implementation/Revision Information**

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This hospital policy is applicable to the Cherokee Indian Hospital Authority and other locations where services of this hospital are provided.