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Revisions: 2/28/2020, 1/22/2021

**Document Scope:** (applies to Policy & Procedure only)

- The requirements herein apply only to the GCBH BH-ASO Central Office and its functions.
  - The requirements herein apply, verbatim, to GCBH BH-ASO and its network providers<sup>2</sup>.
  - The requirements herein apply to both GCBH BH-ASO and its network providers<sup>2</sup>. Additionally, network providers must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which network providers are responsible.
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**PURPOSE:** This policy applies to all Greater Columbia Behavioral Health (GCBH BH-ASO) Executive Committee members or their designated alternate(s), who, while in the course of conducting official business (i.e., during an Executive Committee meeting) have, or are perceived to be in, a conflict of interest. Additionally, this Policy abides by RCW 42.52, Ethics in Public Service.

**DEFINITIONS**

- I. Conflict of Interest: A situation in which a member of GCBH BH-ASO Executive Committee has or promotes an interest which results in or may be perceived to result in:
  - An interference with the objectivity with which the GCBH BH-ASO Executive Committee Member is expected to exercise their responsibilities and duties as a member of the GCBH BH-ASO Executive Committee; and/or
  - An advantage to a GCBH BH-ASO Executive Committee Member that clearly results in a specific benefit or personal material gain.
- II. GCBH BH-ASO Executive Committee Member: A County Commissioner or an individual appointed by the County Commissioners or Tribal Authority as a designated alternate, who is ultimately responsible for representative decisions made during the course of official GCBH BH-ASO Executive Committee business.

**POLICY**

- A. GCBH BH-ASO's vision is committed to the development of a "model managed care organization" that maintains the public trust. Occasionally, in the course of conducting GCBH BH-ASO business, decisions may be perceived to be a conflict of interest.
- B. GCBH BH-ASO integrity and ethical standards may be compromised when conflicts of interest arise that may impair a GCBH BH-ASO Executive Committee Member's ability to conduct business objectively. By definition, elected officials and their designees (i.e., a GCBH BH-ASO Executive Committee Member) have a fiduciary relationship to the electorate.
- C. Consequently, perceived or actual conflicts of interests should be avoided and, if they do arise in the course of conducting GCBH BH-ASO business, be discussed and resolved promptly.

<sup>1</sup>See definitions of document types in AD100, "Development, Approval & Review of Formal GCBH BH-ASO Documents"

<sup>2</sup>"Network Provider" – An organization with which GCBH BH-ASO is contracted for the provision of direct services.

## PROCEDURE


1. The following guidelines apply to all members of the GCBH BH-ASO Executive Committee (herein defined) and GCBH BH-ASO employees. GCBH BH-ASO is a county-based system drawing its authority from the nine (9) counties and one tribal authority, as defined in RCW 71.24.100.
2. As a general rule, conflicts of interest are avoided.
3. It is the duty of all members of the GCBH BH-ASO Executive Committee to maintain the highest standards of ethics in all official action and specifically to comply with RCW 42.52, Ethics in Public Service.
4. Specific matters: The following applications are for guidance on common problems and are to serve as examples for extension by analogy; they are not a complete catalog of applications of this policy:
  - 4.1. Dealing with parties. No member of the GCBH BH-ASO Executive Committee, who has duties with respect to a complaint pending before GCBH BH-ASO, shall deal in any way with the complainant or respondent, on a business or personal basis, except for routine transactions done on the same basis as other members of the public transact business with the party. In circumstances unlike these, members of the GCBH BH-ASO Executive Committee shall either not deal with parties or shall report the matter to the Chair of the GCBH BH-ASO Executive Committee, who shall relieve the GCBH BH-ASO Executive Committee Member of responsibility for the case. Members of the GCBH BH-ASO Executive Committee who have non-routine dealings with parties shall abstain from voting or other action on the matter.
  - 4.2. Accepting things of value. No member of the Executive Committee shall accept anything of economic value from a party to a complaint before GCBH BH-ASO, or from any other person who is dealing with GCBH BH-ASO. Permitting another person to pay for an employee's lunch is within the prohibition of this paragraph, but accepting a cup of coffee under normal office hospitality is not. If the coffee is ordered in a restaurant, the prohibition of this section applies.
  - 4.3. Honoraria for speaking. If the speaking engagement is within the course of a GCBH BH-ASO Executive Committee Member's official duties, acceptance of an honorarium or other compensation is prohibited. Payment of travel expenses and living expenses while traveling, or reimbursement for these expenses, is not prohibited if the trip and payment arrangements have been approved by GCBH BH-ASO.
  - 4.4. Job offers. No member of the GCBH BH-ASO Executive Committee shall make or continue an application or request employment with a party to a case or other matter before the GCBH BH-ASO Executive Committee while the Member has official duties with respect to GCBH BH-ASO.
5. In order to address even a perceived conflict of interest, a GCBH BH-ASO Executive Committee Member who is employed by a private agency that receives funding from

GCBH BH-ASO will not participate in discussions about, nor vote on GCBH BH-ASO budgets, budget amendments, and/or contracts that directly affect their agency.

6. Executive Committee Members or Alternates may cast a vote(s) telephonically.
7. County Commissioners may assign their proxy. A proxy will be in writing and will be provided to the Executive Committee Chair prior to the vote being taken.
8. County Commissioners may communicate their position on budget, budget amendments and/or any other issue coming before the GCBH BH-ASO Executive Committee in writing and have this written direction conveyed, and vote cast by a representative of their choice.
9. Where a potential conflict of interest is evident, the GCBH BH-ASO Executive Committee's Chair and/or the GCBH BH-ASO Executive Committee will assign the matter to a GCBH BH-ASO staff member, a Behavioral Health Advisory Board Member and/or GCBH BH-ASO legal counsel to attempt to avoid the conflict of interest.
10. Where a real or perceived conflict of interest arises, while conducting official GCBH BH-ASO Executive Committee business, the GCBH BH-ASO Executive Committee Member has the duty to disclose the conflict to the GCBH BH-ASO Executive Committee's Chair.
11. The GCBH BH-ASO Executive Committee Member who has disclosed the conflict of interest shall work together with the GCBH BH-ASO Executive Committee Chair to resolve the identified conflict. This may simply require, for example, that the GCBH BH-ASO Executive Committee Member desist from certain actions or activities (i.e., voting on a specific issue) from which the conflict of interest arose (or may arise). Resolution of the identified conflict of interest is recorded in the official minutes of the GCBH BH-ASO Executive Committee Meeting.
12. The GCBH BH-ASO Executive Committee's Chair and/or GCBH BH-ASO Executive Committee may request of any Executive Committee Member who has a perceived conflict of interest to refrain from participation in/with a specific topic/issue, until resolved or no longer deemed a conflict of interest.

**APPROVAL**

  
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Karen Richardson or Sindi Saunders, Co-Directors

  
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Date