CONFLICT OF INTEREST

Standard: HH1-4A.01

PURPOSE:

• To ensure that ACCURATE HOME CARE, LLC’s mission and responsibility to the clients and community it serves are not harmed by any professional, ownership, contractual or other relationship.

• To maintain and adhere to ethical business practices by identifying and resolving any actual or potential conflict of interest that may exist between ACCURATE HOME CARE, LLC and:
  o Governing body/owner
  o Professional Advisory Committee
  o employees and contracted personnel
  o Personnel having and outside interest in and entity providing services to the agency
  o Personnel having and outside interest in and entity providing services to the client
  o Clients served
  o any other client
  o any referral sources

POLICY:

• To assure care provided to clients will not be dependent upon personal, financial or fiduciary relationships or responsibilities, all identified conflicts of interest will be addressed.

• Any contractual arrangement, partnership, agreement of fiduciary relationship entered into by ACCURATE HOME CARE, LLC and any other party that may affect the mission, vision or values of ACCURATE HOME CARE, LLC should be consistent with the policies, procedures and directives of ACCURATE HOME CARE, LLC.

• No officers, directors, management personnel or members may solicit or accept any gratuities, favors, or anything of value from any person or party while representing ACCURATE HOME CARE, LLC.

• A conflict of interest may take overt or covert forms, and can represent many situations. However, it is generally understood that a conflict of interest constitutes a situation when ACCURATE HOME CARE, LLC as a whole or individual representatives of ACCURATE HOME CARE, LLC, has competing professional or personal obligations or personal or financial interests that would make it difficult for ACCURATE HOME CARE, LLC or the individual(s) to fairly fulfill the mission, vision and values of the institution. In general, conflicts of interest relate to the potential for self-gain usually, but not always, of a fiscal nature.

• Potential for self-gain can serve to undermine the judgment or objectivity of licensed independent professionals, administrators, employees, consultants and designated contractors such that their mission and dedication to the values and activities of ACCURATE HOME CARE, LLC are compromised. Therefore it is required that any contractual arrangement, partnership, agreement or fiduciary relationship (including employment) entered into by ACCURATE HOME CARE, LLC and any other party that will affect the mission, vision or values of ACCURATE HOME CARE, LLC, must respect and abide by the policies, procedures and directives of ACCURATE HOME CARE, LLC.

• Conflict of Interest Disclosure statements are signed by all employees, contracted personnel, all committee members and Board of Director members during their orientation and filed in their
personnel file. Disclosures may include, but are not limited to, relationships, associations or business dealings with vendors, suppliers, organizations or individuals with whom ACCURATE HOME CARE, LLC may have a contractual relationship.

- In the event of a proceeding that requires input, voting, or decisions, the individual(s) with a conflict of interest are excluded from the activity.

DEFINITION:

- A conflict of interest may occur when ACCURATE HOME CARE, LLC’s officers, directors, management personnel or, including contracted personnel, enter into a relationship with another organization or person(s) which, in its content or process may result in a compromise of ACCURATE HOME CARE, LLC’s obligation to act in the best interest of its clients or the community it serves.

PROCEDURE:

- ACCURATE HOME CARE, LLC. accepts the responsibility for the provision of optimum care, treatment and services to its client population, and therefore must protect the integrity of clinical decision making, management of disease processes and the provision of care, treatment and services to all clients as well as all billing and marketing practices.
- ACCURATE HOME CARE, LLC will disclose any existing or potential conflicts of interest for those who provide care, treatment and services as well as management and governance activities.
- All conflicts of interest, including potential conflicts of interest, will be researched and addressed in an effort to resolve the conflict of interest, abiding by state and federal laws, regulations and requirements.
- The employee, contracted personnel or member of the Board of Directors may be removed from direct involvement in the situation that has given rise to the conflict of interest discussion.
- If the situation involves client care, treatment, or services, the Department Supervisor may arrange for continuation of client care, treatment and/or services by another staff member until resolution of the issue has been reached.
- Regardless of any fiduciary relationship with any healthcare provider (licensed clinical practitioner, vendor, educational institution, payer, outside resource agency, etc.) ACCURATE HOME CARE, LLC and its representative will strive to provide optimum care to clients following appropriate utilization of resources standards. Care, treatment and/or services provided to clients will not be dependent upon financial relationships or fiduciary responsibilities.
- Any healthcare provider who feels there is a conflict of interest in client management and their relationship with ACCURATE HOME CARE, LLC must notify the Chief Executive Officer/Administer immediately.
- Discussion at the administrative level will be initiated, whereby problem resolution will be the primary goal. In the interim, the head of the department with jurisdiction over the healthcare provider, will arrange for coverage of the client until resolution has been reached.
- If resolution cannot be reached at the administrative level, the matter will be forwarded to the Board of Directors, who will meet as soon as practicable, however, no later than one (1) week after notification of issue. The Board of Directors primary purpose is to assure that optimum client care treatment and service is provided, regardless of fiduciary relationships, while maintaining a fair and just review of all circumstances surrounding the issue. The determination of the Board of Directors will be final.
• No contract or transaction entered into by the corporation known as ACCURATE HOME CARE, LLC, shall be affected by the fact that a director, member or officer of the corporation was personally interested in the contract or transaction or was personally interested in or a director or officer of a corporation that was personally interested in the contract or transaction.

• A member of the Board of Directors or a member of a committee, when called upon to cast a vote for or against a matter which personally involves such individual, shall disclose himself/herself ineligible to vote on the grounds of conflict of interest. In cases where conflict of interest is not clearly apparent, or when such conflict is not declared by a person who in the opinion of other members has potential conflict, the conflict of interest issue may be brought before the body who will vote on such issue to determine whether or not a conflict of interest exists.

• Should there become known, at any time, a conflict of interest between any member of the Board of Directors, ACCURATE HOME CARE, LLC personnel or other healthcare providers and ACCURATE HOME CARE, LLC or any of its agents, the individual(s) may excuse himself/herself from discussions and/or determinations with the identified healthcare provider(s).

• All members of the Board of Directors, and contracted personnel have the responsibility and obligation, if there is such a time as it is discovered, that due to a fiduciary relationship, care treatment and/or services of any client may be compromised or may not be delivered within the known standard of care; to notify the Chief Executive Officer or Corporate Compliance Officer of ACCURATE HOME CARE, LLC immediately upon identification of this issue.