

# GREATER COLUMBIA BEHAVIORAL HEALTH

## Policies and Procedures

Category: Compliance  
Approved On: 04/1999  
Approved By: The Board of Directors  
Revised: 07/28/2005; 08/24/06; 05/07/09  
Effective Date: 15 days from the last revision date

No: CO203.03

Title: **Conflict of Interest Policy**

### I. Scope

This policy applies to all Greater Columbia Behavioral Health (GCBH) Board of Directors or their designated alternate(s), who, while in the course of conducting official business (i.e., during a Board of Directors meeting) have, or are perceived to be in, a conflict of interest. Additionally, this Policy abides by RCW 42.52, Ethics in a Public Service.

### II. Statement of Principles

- A. GCBH is publicly focused to ensure quality mental health services are available throughout the GCBH region.
- B. The GCBH Vision is committed to the development of a “model managed care organization” that maintains the public trust. Occasionally, in the course of conducting GCBH business, decisions may be perceived to be a conflict of interest.
- C. GCBH integrity and ethical standards may be compromised when conflicts of interest arise that may impair a GCBH Board Member’s ability to conduct business objectively. By definition, elected officials and their designees (i.e., a GCBH Board Member) have a fiduciary relationship to the electorate.
- D. Consequently, perceived or actual conflicts of interest should be avoided and, if they do arise in the course of conducting GCBH business, be discussed and resolved promptly.

### III. Definitions

- A. **“Conflict of Interest”** means a situation in which a member of the GCBH Board of Directors has or promotes an interest which results in or may be perceived to result in:

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1. An interference with the objectivity with which the GCBH Board Member is expected to exercise his/her responsibilities and duties as a GCBH Board of Director; and/or
  2. An advantage to a GCBH Board Member that clearly results in a specific benefit or personal material gain.
- B. **“GCBH Board Member”** means a County Commissioner or an individual appointed by the Member Government’s Board of County Commissioners or Tribal Authority (if participating) who is ultimately responsible for representative decisions made during the course of official GCBH Governing Board business. A GCBH Board Member also refers to the officially appointed member governments or Tribal Authority’s designated alternate.

#### IV. Guidelines

The following guidelines apply to all members of the GCBH Board of Directors (herein defined) and GCBH employees. GCBH is a county-based system drawing its authority from the eleven counties and a tribal authority (if participating), as defined in RCW 71.04.

- A. As a general rule, conflict of interest should be avoided.
- B. It is the duty of all members of the GCBH Board of Directors to maintain the highest standards of ethics in all official action and specifically to comply with RCW 42.52, Ethics in Public Service.
- C. 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:
  1. Dealing with parties. No member of the GCBH Board of Directors, who has duties with respect to a complaint pending before GCBH, 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 Board of Directors shall either not deal with parties or shall report the matter to the Chair of the GCBH Board of Directors, who shall relieve the GCBH Board Member of responsibility for the case. Members of the GCBH Board of Directors who have non-routine dealings with parties shall abstain from voting or other action on the matter.

2. Accepting things of value. No member of the Board of Directors shall accept anything of economic value from a party to a complaint before GCBH, or from any other person who is dealing with GCBH. 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.
  3. Honoraria for speaking. If the speaking engagement is within the course of a GCBH Board Member's official duties, acceptance of an honorarium or other compensation is prohibited. Payment of travel expenses and living expenses while traveling, or reimbursement of the commission for these expenses, is not prohibited if the trip and payment arrangements have been approved by GCBH.
  4. Job offers. No member of the GCBH Board of Directors shall make or continue an application or request employment with a party to a case or other matter before the GCBH Board of Directors while the Board Member has official duties with respect to GCBH.
  5. Employment with GCBH. Prior to submitting an application for employment for a position within GCBH, Board Members must request and receive a temporary leave of absence and refrain from any contact with the Search Committee and/or Board Members, other than their own County, concerning the selection process. A request for a leave of absence under these circumstances may be granted by each respective County's Board of Commissioners.
- D. In order to address even a perceived conflict of interest, a GCBH Board Member who is employed by a private agency that receives funding from GCBH will not participate in discussions about, nor vote on GCBH budgets, budget amendments, and/or contracts that directly affect his/her agency.
1. Board Members or Alternates may cast a vote(s) telephonically.
  2. Board Members may assign their proxy. A proxy will be in writing and will be provided to the Board Chair prior to the vote being taken.
  3. Member Governments may communicate their position to Board Members on budget, budget amendments and/or any other issue coming before the GCBH Board of Directors.

- E. Where a potential conflict of interest is evident, the GCBH Board of Director's Chair and/or the GCBH Board of Directors will assign the matter to a GCBH staff member, a Regional Advisory Board Member and/or GCBH legal counsel to attempt to avoid the conflict of interest.
- F. Where a real or perceived conflict of interest arises, while conducting official GCBH Board of Director business, the GCBH Board Member has the duty to disclose the conflict to the GCBH Board of Director's Chair.
- G. The GCBH Board Member who has disclosed the conflict of interest shall work together with the GCBH Board of Director Chair to resolve the identified conflict. This may simply require, for example, that the GCBH Board 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 Board of Directors Meeting.
- H. The GCBH Board of Director's Chair and/or GCBH Board of Directors may request of any Board 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.

Approved:

Date:

/S/ Julie LaPierre  
Julie LaPierre  
Interim Director

05/07/2009

***Greater Columbia Behavioral Health  
Board of Directors  
Conflict of Interest Annual Disclosure***

Name: \_\_\_\_\_ Member Government: \_\_\_\_\_

Date: \_\_\_\_\_

As the County Commissioner, Tribal Authority or Member Government Designee, I \_\_\_\_\_ have read, understand and agree to abide by the GCBH Conflict of Interest Policy and Code of Conduct. I further understand that it is my obligation and responsibility to make decisions which are in the best interest of Greater Columbia Behavioral Health. It is my obligation to avoid conflicts of interest when making decisions on behalf of Greater Columbia Behavioral Health.

Should a possible or perceived conflict of interest arise while conducting business on behalf of Greater Columbia Behavioral Health, I recognize that I have the responsibility to notify the Chair of the GCBH Board of Directors and abstain from participation in conducting GCBH business until approved and/or resolved by the GCBH Chair or his/her designee. You must disclose those activities, relationships and interests which might influence or be perceived as influencing or having an impact on your performance, duties and actions as a member of the GCBH Board of Directors. If you are unsure about whether a particular item should be disclosed, it is generally best to disclose it

I understand that the information on this form is solely for the use of Greater Columbia Behavioral Health and is considered confidential information. Release to external parties shall be required only by law and/or federal regulations.

\_\_\_\_\_  
Signature of Certification

\_\_\_\_\_  
Date