

**Rocky Mountain Health Plans (RMHP)  
Regional Accountable Entity (RAE) Governance Plan and  
RAE Limited Managed Care Capitation Initiative Governance Plan**

June 1, 2018  
Revised July 1, 2019  
Revised January 23, 2020  
Revised February 14, 2021  
Revised January 24, 2022

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This RAE Governance Plan Deliverable:

- Describes how RMHP protects against any perceived conflict of interest among its governing body from influencing RMHP’s activities under its RAE Contract with the Department of Health Care Policy and Financing (the Department).

As the Region 1 RAE, RMHP serves as the licensed, contracting organization that is the single point of accountability to the Department for all facets of RAE operations and deliverables.

The Key objectives of this approach are to:

- Organize the RAE model around the goals and needs of the individual clients, as whole person, with aspirations, dreams and contribution to offer to the community.
- Establish the locus of leadership and decision-making firmly within a local, multi-disciplinary, multi-sector community governance model
- Archive the deepest possible degree of integration among physical health, behavioral health and human service organization – and ensure that resources and talent at every level are put to the most productive use possible.
- Make the significant expertise, experience, technology, research and development and capital investment available within a national enterprise available to local leaders, with the autonomy required to close gaps, learn and innovate rapidly
- Establish clear, straight lines of accountability to the Department that allow for the efficient fulfillment of all deliverables and public reporting duties, with an appropriate separation of controls, checks and balances.
- Move well beyond the traditional, narrow “Behavioral Health Organization carve out” and “third party” managed care models of operation in a framework that ensures competence and continuity without sacrificing access or transparency.

Achieving these objectives necessitates an approach that transcends outdated “delegation” concepts in managed care, as well as narrow “ownership” arrangements among a group of self-interested parties. The Region 1 approach adopts a more forward thinking and progressive model that promises to produce better results and improved outcomes for Members, Providers, Community Organizations and Stakeholders.

Additionally, a broader array of providers and community leaders, including representatives from Managed Service Organizations and other alternatively funded organizations that serve Health First Colorado Members, are empowered to provide direction to the RAE through a community governance process.

Our RAE Governance model has been adjusted from the first contract year of the RAE based on community and stakeholder feedback. RMHP has developed a more inclusive, structured model to respond to this feedback and fully leverage the RAE councils and committees to inform and improve the delivery of services in Region 1. The following are part of this governing and advisory structure.

- **Reunion Health:** Reunion Health, which is comprised of Community Mental Health Centers and Federally Qualified Health Centers operating throughout Region 1, collaborates with RMHP under a Joint Operating Agreement (JOA) charter to ensure the delivery system is optimally organized to produce whole person health.
- **Member Advisory Council:** Consumers and supporting organizations, representing a diverse array of families, children, underserved communities and people living with disabilities and other special needs participate on this council to ensure that feedback is not only conveyed but incorporated into RAE policy, priorities are set and design improvements are executed throughout the RAE.
- **Behavioral Health Community Focus Groups:** These groups are convened across Region 1 and include providers, Members and community stakeholders with a focus on a Behavioral Health services, identifying gaps in care and solutions to access and availability.
- **Program Improvement Advisory Committee (PIAC):** This committee is convened in accordance with requirements set by the Department and its areas of focus and recommendations are brought to and from groups such as the following:
  - Reunion Health Executive Committee
  - RMHP Member Advisory Councils
  - HCPF Member Experience Advisory Councils
  - Member Focus Groups
  - Statewide PIAC convened by the Department
- This group includes voting members with representation from the following entities:

- Community Mental Health Centers
- Criminal justice advocacy
- Family Resource Centers
- Federally Qualified Health Centers
- Health Alliances
- Health Neighborhood Providers - Care Coordination
- Health Neighborhood Providers - Public Health
- Health Neighborhood Providers - Oral Health
- Health Neighborhood Providers - Ambulance Services / Paramedics
- Latino Initiatives
- Members and Family Members (4 seats)
- Nurse-Family Partnership
- Private Behavioral Health Providers
- Private Primary Care Medical Providers
- Tribal representative

All PIAC meetings are open to the public and include a virtual participation option. The primary purpose and focus of the Regional PIAC is to strengthen relationships across the region, share information and feedback with partners, collaboratively develop solutions to critical health issues, and prioritize RMHP's work as the RAE. The committee functions as an open forum to exchange information that helps drive and inform improvement of health care delivery across Region 1. The RMHP PIAC seeks to be inclusive, open to feedback and guided by stakeholders and Members in the Region 1 community.

**RMHP's approach to managing conflicts includes the following steps:**

- **Duty to Disclose** – All governing committee members of the RAE will be required to complete an annual conflict of interest disclosure form. However, this annual disclosure does not relieve these individuals of the responsibility to report actual and apparent conflicts of interest as soon as they become aware of the conflict. If a member fails to disclose a conflict of interest the RMHP will review to determine if the member will be permitted to continue in their role.
- **Management of Conflicts of Interest** – RMHP operates independently from provider ownership and control and monitors conflicts within the committee advisory processes. Each case is individually reviewed and considered. This will include a thorough review of all material facts and may include guidance from legal counsel, if needed. Committee members may be asked to temporarily suspend participation and/or voting while a review is underway. If a conflict is determined to exist, appropriate remediation will take place including, but not limited to having members recuse themselves from particular topics up to removal from the committee.

The Conflict of Interest plan includes language that any governing committee member is required to immediately disclose any conflict or apparent conflict to RMHP, where it will be determined how the conflict or apparent conflict is to be resolved. We believe many actual and apparent conflicts of interest can be resolved if the conflict is reported before it creates the appearance or reality of having influenced the judgment of the potentially conflicted individual.

Any action taken by RMHP to resolve a conflict of interest, whether actual or perceived, is documented and reported to the full membership of both committees.

