

POLICY

DP seeks to avoid any conflict of interest or the appearance of any conflict of interest on the part of its Board members and staff in carrying out its mission and day-to-day functions.

PURPOSE

Developmental Pathways, Inc. (DP) is a Community Centered Board (CCB), a private non-profit organization designated in Colorado statute as the single-entry point (SEP) into the long-term service and support (LTSS) system for persons with developmental disabilities in Arapahoe and Douglas counties and the city of Aurora.

As a CCB, DP is responsible for case management services for both State-funded and Medicaid Waiver-funded programs. Case management duties include intake, eligibility determination, waitlist management, service plan development, monitoring, investigations of allegations of mistreatment, and many other functions. These functions are carried out by the Case Management/Quality Assurance Department.

Both federal and state law and regulation require case management services be provided in a conflict-free manner, which means individuals enrolled in a Home and Community-Based Services (HCBS) Medicaid Waiver cannot receive both case management and Medicaid Waiver-funded direct services and supports from the same agency. Case management agencies are required to maintain appropriate firewalls between case management activities and service provision if both activities are provided by the same entity.

As of July 2017, Developmental Pathways, Inc. (DP) and Continuum of Colorado, Inc. (Continuum) separated into two distinct legal entities with separate Boards of Directors (BODs). The companies remain affiliated through a shared executive leadership provided by Non-profit Management Services of Colorado (NMSC).

PROTOCOL

The following procedures will be maintained to insure appropriate firewalls exist between case management carried out by Developmental Pathways and direct services provided by Continuum of Colorado.

1. The Case Management/Quality Assurance Department will report directly to the Chief Executive Officer of Developmental Pathways.
2. The Case Managers shall ensure all individuals and families are provided with information about all qualified providers.



Conflict-Free Case Management Policy

3. Case managers shall ensure all individuals and families are advised of their: (1) choice of long term care services and supports; (2) choice of qualified providers; (3) right to change providers; (4) right to file complaints and/or grievances; and (5) choice of case management agencies.
4. Case Management personnel shall maintain professional arms-length contact with all employees of Continuum in accord with such professional contact afforded similar providers.
5. Case Management personnel shall not engage in any favoritism or bias towards Continuum employees, management, or customers. The case manager shall be responsible to the interests of the individuals served.
6. Development and monitoring of the service plan shall be unbiased and in accord with the interests of the individual in services.
7. All complaints or allegations of mistreatment shall be addressed in a prompt, equitable manner and in accord with federal and state requirements and procedures applicable to all providers.
8. Case Management will disclose to all individuals in services, guardians, and appropriate persons any affiliations between DP and Continuum. A written disclosure shall be provided annually to persons in services.

AUTHORITY

42 CFR 441.301 (c)(1)(VI),

Colorado Revised Statutes (CRS): 25.5-10-202; 25.5-10-204, 25.5-10-206; 25.5-10-207 (1); 25.5-10-208; 25.5-10-209. 25.5-10-211