



Medication
Management
Systems

8441 Wayzata Boulevard
Suite 340
Golden Valley, MN 55426

MEMORANDUM

DATE: January 11, 2017

TO: Medication Management Systems, Inc.


FROM: Roberta Patrow, Director MTM Operations & Compliance Officer

RE: Conflicts of Interest Policy

Medication Management Systems, Inc. (MMS) is a first tier, downstream or related entity service provider to customers who administer Medicare and/or Medicaid health plans. MMS is committed to detect, prevent, and correct any non-compliance with Medicare and Medicaid requirements in the delivery of services relating to Medicare and Medicaid business, including detecting, preventing and correcting fraud, waste and abuse. The MMS Conflict of Interest Policy is one way in which MMS demonstrates this commitment.

The MMS Conflicts of Interest Policy is here attached. Please review it and sign the Conflicts of Interest Disclosure Form and return to me.

Thank you.

	CONFLICTS OF INTEREST DISCLOSURE FORM
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Conflicts of Interest

Employees, consultants, and Board of Directors members are required to deal with all persons doing business with the Company without favor, preference, or personal considerations, and to perform all duties and responsibilities in a manner that promotes MMS’s best interests, in accordance with established policies, procedures, and standards.

Employees, consultants, and Board of Directors members are required to disclose any potential or actual conflict of interest to the Company, and to submit a signed Conflicts of Interest Disclosure Form to the Office of the President and Chief Operating Officer before their first day of employment or service and on an annual basis thereafter.

Potential applicants, consultants, and Board of Directors members may be ineligible to become employed or provide services with MMS if certain conflicts of interest are found to affect or may have the appearance of affecting various regulatory and contractual obligations, or may have an adverse impact on the services provided by the company or its contracted providers to enrollees of MMS clients.


Definition of Conflicts of Interest

A conflict of interest is any situation to which an individual’s or family member’s financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, an individual’s professional judgment in exercising any MMS duty or responsibility. Family members include spouses, children, stepchildren, parents, siblings, and domestic partners.

A conflict of interest arises when an employee has such a personal interest in a transaction, or in a party to a transaction, that it reasonably might affect or may have the appearance of affecting the judgment they exercise on behalf of the Company.

The following are examples of potential conflicts of interest that should be reported to the organization:

- » An ownership interest of greater than five percent (5%) of any business entity
- » A material professional or business relationship
- » A direct or indirect financial incentive for a particular determination
- » Incentives to promote the use of certain products or services
- » A known familiar relationship that meets the definition listed in this policy
- » Any prior or personal involvement in the specific case under review (Authorization, Pre-Notification, Appeal, or Claim)
- » Employment by or engaging in business with an employer that is in any way competitive or in conflict with any transaction, activity, or objective of the organization
- » Engaging in any business with or employment by an employer of goods or services to the organization
- » Making use of the fact of employment by the organization to further outside business or employment

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- » Owning or leasing any property with knowledge that the organization has an active or potential interest therein
- » Lending money to or borrowing money from any party who is in any fiduciary relationship with the organization
- » Accepting any gratuity, favor, benefit, gift, commission, or payment of any sort in connection with work for the organization other than the compensation agreed upon between the organization and the employee
- » Making use of or disseminating, including by electronic means, any confidential information acquired through employment by the organization for personal profit or advantage, directly or indirectly

Application


It is recommended that employees, consultants, and Board of Directors members abide by the following guiding principles of conduct to avoid a conflict of interest:

- » Avoid any conflict of interest that may be perceived as creating a potential conflict between interests of MMS and the interests of the entity in question
- » Exercise the utmost good faith, strict rule of honesty, best care, skill, and judgment in all transactions
- » Do not use an assigned position, or knowledge gained from employment with MMS, in such a manner that a conflict of interest might arise.
- » Immediately disclose any potential conflict of interest
- » Place the interest of MMS foremost in any dealings involving the organization
- » Avoid directly or indirectly participating in any discussion, decision, arrangement, investment, vote, or other activity that constitutes a conflict of interest or potential conflict of interest
- » Do not accept any favor that may be perceived to potentially influence any official act
- » Do not use any Company assets or labor for personal use, nor develop a relationship with employees of MMS or its contracted providers or clients that may interfere with the exercise of impartial judgment in decisions affecting MMS, its contracted providers, its clients or their enrollees

Should a conflict of interest be identified that may make an employee, consultant, or Board of Director member ineligible for employment or service, they will be notified by the Office of the President and Chief Operating Officer and required to provide a written statement (within five (5) business days) explaining how the activity in question will in no way conflict with his or her ability to perform assigned duties and responsibilities and will not affect their professional judgment or ability to promote the interests of the organization. MMS, at its sole discretion, can accept or reject the written explanation and determine whether to begin or continue the employee’s employment, the consultant’s services, or a Board of Director member’s service.

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Employees, consultants, or Board of Directors members who are in violation of this policy, or who do not submit their signed Conflicts of Interest Disclosure Form before their first day of employment or service and as requested annually, may be subject to disciplinary action, up to and including termination of employment, contract, or service.

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NAME: _____

POSITION: _____

I hereby reviewed the MMS Conflicts of Interest policy above. I hereby certify that the information set forth below is true and complete to the best of my knowledge. Neither I, nor any person with whom I am involved, has any personal or business relationship or circumstance I believe could contribute to a conflict of interest as defined in MMS' Conflicts of Interest Policy, except the following, which may be questionable and will be reviewed by the President and COO:

Signature: _____

Date: _____

President & COO Approval

Signature: _____

Date: _____