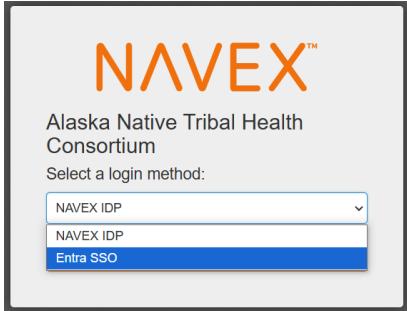


FAQ: NAVEX Conflict of Interest Disclosure Management System

Question	Answer
<p>Why is the conflict-of-interest disclosure process changing?</p>	<p>In order to more proactively manage the risks of conflicts of interest, ANTHC’s Ethics and Compliance Services department is implementing a new system to collect disclosures on potential conflicts of interest (e.g., business ownership, gifts received, relatives employed at ANTHC, board memberships, etc.) from certain staff.</p> <p>NAVEX Conflict of Interest (COI) Disclosure Management is a web-based system where staff can disclose potential conflicts of interest, those disclosures can be evaluated to determine if any conflict could or does exist, and any follow-up mitigation can be documented.</p>
<p>How will the NAVEX system collect information?</p>	<p>The NAVEX system will lead users through a questionnaire that covers all the necessary categories of disclosures and collect the information needed to evaluate those disclosures.</p>
<p>When is this happening?</p>	<p>The link to the questionnaire will be distributed to affected staff in late January.</p> <ul style="list-style-type: none"> • Staff who will need to complete disclosures will receive an email from donotreply@navexglobal.com with a link to the NAVEX site. • The body of the email will also include details on how long staff members have to complete the questionnaire.
<p>Will everyone have to complete the questionnaire?</p>	<p>Only certain staff will be required to complete the disclosure questionnaire. These staff fall into two categories:</p> <ul style="list-style-type: none"> • Physicians and Residents; or • Any direct hire, Commissioned Corps, or contracted staff member whose position is designated as a manager (i.e., has a manager code assigned). <p>These staff have been prioritized because they have either a high degree of responsibility for patient care or could have decision-making authority for hiring, firing, compensation, etc. These types of positions have been designated as the highest risk for conflicts.</p>

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<p>How long will staff have to complete the questionnaire?</p>	<p>Staff will be given 30 days to complete the questionnaire. This timeframe will be communicated in the email they receive.</p> <ul style="list-style-type: none"> • They will also receive a reminder email from the system 5 days before the deadline, if they have not completed the questionnaire yet.
<p>What about new hires? How will they know if they need to complete the questionnaire?</p>	<p>On a regular basis, the NAVEX system receives an updated list of employees who fall into the categories described above. Anyone new to the list will automatically be notified about the need to complete the questionnaire and be given the same 30 days to do so.</p>
<p>How do I log in to the NAVEX COI Disclosure Management system?</p>	<p>Clicking the link in the email will bring you to the NAVEX login screen.</p> <ul style="list-style-type: none"> • Select Entra SSO for the login method and click Continue. • Select/enter your ANTHC email and your current ANTHC password. You do not need a separate username or password. <div data-bbox="1047 818 1451 1127" style="border: 1px solid black; padding: 10px; margin: 10px auto; width: fit-content;">  <p style="text-align: center;">NAVEX™</p> <p style="text-align: center;">Alaska Native Tribal Health Consortium</p> <p style="text-align: center;">Select a login method:</p> <div style="border: 1px solid #ccc; padding: 2px;"> <p>NAVEX IDP</p> <p>NAVEX IDP</p> <p style="background-color: #0056b3; color: white; padding: 2px;">Entra SSO</p> </div> </div>

FAQ: NAVEX Conflict of Interest Disclosure Management System

Question	Answer
<p>How long is the questionnaire?</p>	<p>The questionnaire is divided into 10 categories. Each category has a brief introduction followed by what is called a “trigger question.”</p> <ul style="list-style-type: none"> • If you answer No to the trigger question, you can move to the next category. • If you answer Yes, follow-up questions will appear that will collect additional information. <div data-bbox="800 483 1705 829" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>ANTHC Conflict of Interest Disclosure Questionnaire</p> <p>Page 3 of 10</p> <p>Board Participation</p> <p>A conflict of interest may exist if you serve as a board member or officer for any company or organization, whether a for-profit or non-profit, that does business with or has a relationship with the Alaska Native Tribal Health Consortium. All board service, whether paid or unpaid, should be disclosed so that any potential conflicts can be evaluated.</p> <p>Refer to: Outside Employment and Activities Policy</p> <p>Do you participate on any boards of directors, for any company or organization other than the Alaska Native Tribal Health Consortium, whether paid or not? *</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> </div> <p>Note: Fields marked with an asterisk (*) are required and you must complete them before moving to the next disclosure category.</p>
<p>What if I have more than one thing to disclose for a particular question (for example, I serve on more than board)?</p>	<p>At the end of each follow-up for a disclosure, there is an option to add another disclosure in the same category (for example, another board membership or gift received). Simply click on that button and you will be prompted to complete the questions for the additional disclosure. Add as many additional disclosures as needed.</p> <p>Example:</p> <div data-bbox="613 1203 1121 1312" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">Add New Employment Activity</p> </div>

FAQ: NAVEX Conflict of Interest Disclosure Management System

Question	Answer
<p>What if I start the questionnaire but can't finish it right away?</p>	<p>If you exit the NAVEX system, it will save any responses you have entered. You can return later and complete the rest of the questions or add any information that was missing.</p> <ul style="list-style-type: none"> • Note: You will have to begin at the start of the questionnaire and navigate to where you left off.
<p>What types of things do I have to disclose?</p>	<p>Disclosure categories include the following:</p> <ul style="list-style-type: none"> • Service on an advisory organization that could affect ANTHC business; • Board participation; • Government participation; • Outside employment; • Family member external employment that could affect your work at ANTHC; • Family member employment or relationships in the workplace; • Outside investments; • Business opportunities; • Gifts and entertainment received; and • Other (for anything staff want to disclose that does not fit into one of the above categories). <p>Note: This questionnaire does not address the disclosures required under the Research-Related Financial Conflicts of Interest Policy.</p>
<p>What if I want to check a policy to confirm what I need to disclose?</p>	<p>Links to any relevant policies are included in the introduction to each disclosure category. Clicking on the link will take you to the most recent version of the policy in ANTHC's policy portal.</p>
<p>What if I am not sure if something should be disclosed?</p>	<p>It is always better to disclose and let the Ethics and Compliance Services team determine whether a conflict exists. Disclosing it through this system also creates a record so that we can easily look back in the future and verify that it was reported. When in doubt, disclose.</p>

FAQ: NAVEX Conflict of Interest Disclosure Management System

Question	Answer
<p>What if I have already told my manager about a situation that the questionnaire asks about?</p>	<p>Even if you have already disclosed a potential conflict to your manager, HR, or through some other channel, you should still disclose it on the questionnaire. This will help us create a complete record of all potential conflicts.</p> <ul style="list-style-type: none"> • Note: Every category’s follow-up will ask if you have already disclosed the situation, how you disclosed it, and whether your manager is aware of the situation.
<p>I have documents that help explain something I am disclosing. Can I attach them?</p>	<p>Yes, every question has a field for attaching any documents that might help explain a potential conflict. Feel free to attach any files you feel will help clarify your disclosure.</p>
<p>What if something changes later? Can I update my answers?</p>	<p>The disclosure questionnaire will be available for a full year. At any time, you can return to the NAVEX site and follow the instructions in the Directions to Amend a Response in the upper left widget. In addition, ANTHC will launch a new disclosure campaign each year.</p> <div data-bbox="982 841 1518 1092" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">Directions to Amend a Response ⚙️</p> <hr/> <ol style="list-style-type: none"> 1. Click on Disclosure Questionnaire in the lefthand Navigation Menu. 2. Click on "My Disclosures." 3. Open the disclosure by clicking on its Disclosure ID (in blue). 4. Go to "View Full Response" on your previous disclosure. 5. Click on "Amend Response" and follow the system prompts. </div>

FAQ: NAVEX Conflict of Interest Disclosure Management System

Question	Answer
<p>I received an email about a follow-up message on my disclosure. What does this mean?</p>	<p>If the person reviewing your disclosure needs additional information to determine whether a conflict exists, they can enter a message in the NAVEX system, and you will receive an email with a link to the message where you can respond.</p> <p>Example:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Please read and acknowledge a new follow-up message about your Disclosure. 2024-D-000005.</p> <p>Click the link above to view it.</p> </div>
<p>How will I know if something I disclose is considered a conflict of interest?</p>	<p>Each disclosure will be reviewed by members of Ethics and Compliance Services, Legal Affairs, or HR, as appropriate. If the review determines that you have a conflict or potential conflict, you will be contacted, and an appropriate course of action will be determined.</p> <ul style="list-style-type: none"> Any mitigation plans or other action taken to resolve a conflict will also be documented in the NAVEX system.
<p>Who do I contact if I have questions or need help completing the questionnaire?</p>	<p>Please direct all questions to CorporateCompliance@anthc.org.</p>