COLORADO COMMUNITY HEALTH ALLIANCE

Colorado Community Health Alliance Governance Plan

Region 3

October 9, 2026

Colorado Community Health Alliance (CCHA) Governance Plan

CCHA's Governance Plan aligns with Section 1.7 of the Regional Accountable Entity (RAE) Contract and describes:

- The Program Governing Body structure and membership
- Safeguards to minimize any potential or perceived conflicts of interest among its governing body from influencing activities under the RAE Contract
- Compliance with submission to the Department of Health Care Policy and Financing (the Department) annually and posted publicly on CCHAcares.com.

CCHA serves as the RAE for Region 3 and performs all Contract functions in compliance with State and federal statutes, regulations, and rules. We administer the Accountable Care Collaborative (ACC) Program per the requirements for both a Primary Care Case Management (PCCM) entity and a Prepaid Inpatient Health Plan (PIHP) as defined in 42 C.F.R. §438.2 to fully integrate clinical care, operations, management, and data systems. We bring proven local and national approaches to integrated care under one, truly accountable entity dedicated to improving the health of members, improving quality and reducing costs in Colorado's Medicaid system.

Program Governing Body

The CCHA Program Governing Body is responsible for oversight of activities related to the RAE Contract. CCHA's Program Governing Body aligns with the governing board requirements set forth in the Contract, including the participation of a Health First Colorado member (1.7).

The Program Governing Body is augmented by a committee structure that promotes clear accountability while fostering inclusive participation from members, providers, and the community to help guide and inform the RAE model. Our governing body includes several Board members, including those who have direct experience with the ACC program, that bring extensive physical health and behavioral health background and expertise. Health First Colorado member(s) lived experience provides valuable insight into the impacts of the program design and policy decisions. All Governing Body members have equal voting rights.

The CCHA Program Governing Body is responsible for the following:

- Driving the mission and purpose of CCHA;
- Monitoring and overseeing CCHA and the Colorado Medicaid Contract to meet ACC goals;
- Ensuring CCHA operations are in compliance with ACC Program requirements;
- Reviewing data to evaluate and drive value, experience, and outcomes for the Medicaid program; and
- Administering the Medicaid program in compliance with the requirements for both a PCCM and PIHP entity.

CCHA Program Governing Body:

- **Olivia Alvarado** – Colorado Community Health Alliance, LLC
- **Jennifer Ann Dewane** – Elevance, Inc.
- **Samantha Fields** – Health First Colorado Member
- **Patrick K. Fox, MD** – Elevance, Inc.
- **Janet Milliman** – Colorado Community Health Alliance, LLC
- **Ronald W. Penczek** – Elevance, Inc.
- **Heather Piernik** – Colorado Community Health Alliance, LLC
- **Amy Yutzy** - Elevance, Inc.

The names and affiliations of the Program Governing Body members are on CCHAcares.com.

Board of Directors

The CCHA Board of Directors (the Board) is a subset of the Program Governing Body. The Board is comprised of members from the managing partner entities who jointly oversee the activity and performance of CCHA, LLC. The Board maintains controlling interest of CCHA, LLC. The Board is selected based on their clinical, operations, management, and data experience as well as minimal opportunities for conflicts of interest.

Process for Identifying and Resolving Conflicts of Interest

CCHA upholds a strict Code of Business Conduct and Ethics (Code), which obligates us to comply with all applicable laws, rules, and regulations related to operations. To uphold our Code, we act in an honest manner at all times; report any suspected or observed misconduct, including violations of law, policy, or procedure; make a full and timely disclosure of any situation that may result in a conflict of interest or the appearance of a conflict; conduct ourselves in a manner that avoids actual or apparent conflicts of interest to protect our business reputation and integrity of the program; and do not accept gifts, payments, fees, services, discounts, valuable privileges, or other favors that may appear to improperly influence performance of our duties. We also mandate that our vendors, Contractors, and Subcontractors comply with the Code.

CCHA's joint venture partners, Elevance Health and Physician Health Partners, maintain codes of conduct that include conflict of interest policies and, further, have created procedures to make sure that all employees act in the best interest of our organization and to avoid conflicts. We require all CCHA employees to complete the conflict of interest attestation to certify there are no potential conflicts. If any employees have a change in status, they must complete the attestation again within 30 days of the change. Management-level staff and Program Governing Body members must also complete the attestation once a year. Our commitment to compliance spans our entire organization. As soon as we learn of any potential conflict of interest or deficiency — whether identified by us, the Department, providers, or other party — we will investigate the root cause and take action to mitigate the conflict and prevent recurrence. Our Ethics and Compliance team will research and investigate potential occurrences to determine if a conflict exists and take appropriate steps to resolve them. We will immediately report any identified conflicts to the Department.

We embrace transparency, open communication, and continued dialogue across our organization and with the Department so we can continue to meet the expectations of the Department, providers, and the members we serve.

Conflicts of Interest

The members of the CCHA Program Governing Board **do not have any** perceived conflicts of interest based on the description in 1.7.2.1 in the RAE Contract. Furthermore, CCHA mitigates any perceived conflicts of interest through our Program Governing Board as well as through stakeholder committees. Our multilayer governing and advising structure fosters accountability throughout the organization. The CCHA Program Governing Board adheres to our written codes of conduct. These documents were created to minimize and manage conflicts of interest, disclose ethical, legal, financial, and other conflicts, and remove themselves from decision-making if it is a conflict involving themselves, their family members, or entities to which they or their family members are closely associated. Under this policy, Program Governing Board members are required to disclose actual or potential conflicts of interest, as well as certain relationships and transactions, and to enable the Program Governing Board to take steps it considers necessary or advisable to address conflicts of interest.

The Board of Directors and the CCHA Compliance Committee have primary responsibility for implementing this policy and reviewing it annually. This policy is disseminated to Program Governing Board members upon joining and annually thereafter. Any potential conflicts will be reviewed, and the Board of Directors will provide disclosure statements and make recommendations if action is required or advisable. If any conflicts of interest arise, CCHA will notify the Department via a Conflict of Interest Disclosure Statement. If any updates to the codes of conduct occur, CCHA will notify the Department and update the documents on CCHAcares.com.

CCHA will submit the Updated RAE Governance Plan to the Department annually and as updates occur. We will post the approved RAE Governance Plan publicly on our website.