



CONSORTIUM

FOR ADVANCED PRACTICE PROVIDERS

Conflict of Interest Procedures Procedures to Manage Conflict of Interest

*Taken from the Accreditation
Policies and Procedures Manual
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5.5.2 Conflict of Interest Procedure

The duty to disclose, determining whether or not a conflict exists, and specific procedures for addressing the conflict of interest (COI), and violations of the conflict of interest policy, and records of the proceedings are described in detail below.

5.5.2.1 Duty to Disclose/Recuse: *In connection with any COI, an Accreditation Commission Representative must disclose to the Accreditation Commission Chair the existence of a COI as soon as the conflict becomes apparent.*

If any employee, staff, or Accreditation Commission member has engaged in any consulting relationship with any program, and that program subsequently submits to the Consortium a Notice of Intent to Apply for accreditation by the Consortium, such individual(s) must, upon receipt by the Commission of such Notice of Intent to apply, recuse themselves from any and all activity regarding the planning, execution, follow up and ultimately decisions regarding accreditation.

In order to prevent either a conflict of interest or the appearance of a conflict of interest, the Consortium shall further adhere to the following procedure regarding consulting activities. *This disclosure is submitted and/or recorded on the Conflict of Interest Disclosure Form. The Accreditation Chair will then forward a copy of the Disclosure to two others selected to join the Chair as members of the "Conflict of Interest Review Panel." If the COI involves one of the panel members, then the others on the panel will recruit a third person for the panel. The person of interest will be given the opportunity to disclose all relevant facts to the Conflict of Interest Panel.*

5.5.2.2 Determining Whether a Conflict of Interest Exists:

After disclosure of a COI and all relevant facts, and after any discussion with the interested person, the Conflict of Interest Panel shall make a determination about whether or not a conflict, or the appearance of a conflict exists, and if one does exist, how to manage it. The Accreditation Commission will be informed of the disclosure and resultant action at their next regularly scheduled meetings.

5.5.2.3 Managing the Conflict of Interest: The Accreditation Commission Representative who disclosed the COI may make a presentation to the Conflict of Interest Panel, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible COI. The Conflict of Interest Panel shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

After exercising due diligence, the Conflict of Interest Panel shall determine whether the Accreditation Commission can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a COI.

If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Conflict of Interest Panel shall determine by a majority vote whether the transaction or arrangement is in the Accreditation's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.