



CONSORTIUM

FOR ADVANCED PRACTICE PROVIDERS

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Conflict of Interest Policy

Purpose

To ensure that all matters regarding the accreditation of programs by the Consortium are conducted with integrity, fairness, impartiality and objectivity, the following policy is intended to be upheld by members of the Board, the Accreditation Commission, Officers, site visitors and any other individual representing Consortium.

Conflicts of interest and the appearance of conflicts of interest must be avoided in all circumstances. Anyone representing the Accreditation Commission or acting on behalf of the Accreditation Commission ("Accreditation Commission Representative") shall not have direct involvement with and/or participate in any decision-making capacity regarding accreditation if they have an actual conflict of interest or the appearance of a conflict of interest with the program.

A Conflict of Interest ("COI") for purposes of the Accreditation Commission occurs when an Accreditation Commission Representative has competing interests or loyalties due to a current or previous financial, professional or personal interest in an organization seeking accreditation of its program. A financial, professional or personal interest exists if: (1) the Accreditation Commission Representative participates or participated as an employee or consultant, in the development, in the implementation or otherwise was involved with the program seeking accreditation; or (2) the Accreditation Commission Representative receives, received or stands to receive any direct financial benefit from the organization seeking accreditation, including but not limited to a compensation arrangement with such organization. A compensation arrangement means any management equity plan or stock option plan or any other management or employee benefit plan or other agreement or arrangement, including any employment arrangement or equity purchase agreement between the Accreditation Commission Representative and the organization.

Examples of conflicts of interest include, but are not limited to:

- *Employment with, or serving as a mentor or supervisor, involving the program under review;*
- *Being a current or former trainee of the program's sponsorship organization under review;*
- *Having been paid or otherwise profited or appeared to have profited from service to the training unit or clinical program that is under review;*
- *Having a current financial interest in the sponsoring organization of the program that is under review that is under review;*

- *Having any other relationship or reason that could reasonably serve as an impediment to rendering an impartial, objective professional judgement regarding the program that is under review.*

5.1.1 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.

5.1.1.1 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.

5.1.1.2 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.*

5.1.1.3 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.

5.1.2 Violations of the Conflicts of Interest Policy

If the Accreditation Commission has reasonable cause to believe an Accreditation Commission Representative has failed to disclose actual or possible conflicts of interest, it shall inform the Accreditation Commission Representative of the basis for such belief and afford the Accreditation Commission Representative an opportunity to explain the alleged failure to disclose.

If, after hearing the Accreditation Commission Representative's response and after making further investigation as warranted by the circumstances, the Accreditation Commission determines the Accreditation Commission Representative has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

5.1.3 Records of Proceedings

The minutes of the meetings of the Accreditation Commission, the Conflict of Interest panels and any other Commission decision-making entities shall contain:

- *The names of the persons who were present for discussions and votes relating to the transaction or arrangement;*
- *The content of the discussion, including any alternatives to the proposed transaction or arrangement;*
- *Record of any votes taken in connection with the proceedings.*