



CONFLICT OF INTEREST POLICY FOR MEASURE ENDORSEMENT STANDING COMMITTEES

As part of its consensus development process (CDP), the National Quality Forum (NQF) relies on its Measure Endorsement Committees for recommendations regarding measure endorsement. This Conflict of Interest Policy (the “Policy”) is an important part of assembling a committee to review measures.

For purposes of this Policy, the term “conflict of interest” means any financial or other interest that you have which could actually, or be perceived to (1) significantly impede your objectivity, or (2) create an unfair competitive advantage for you or an organization associated with you. A conflict of interest analysis must be done in context. In order to conduct a meaningful analysis and minimize the possibility of a conflict of interest, NQF asks each Committee member to:

(1) Complete a Disclosure of Interest Form when submitting an application to serve on a Measure Endorsement Committee and update the form annually upon NQF’s request.

(2) Complete a Measure-Specific Questionnaire for each measure, or batch of measures, that the Committee will consider. NQF staff will send these questionnaires to you as needed once staff knows the specific measures that your Committee will consider.

NQF will ask you a series of questions in the Disclosure of Interest Form in order to decide if you have a real or perceived conflict of interest. NQF will review the Disclosure of Interest Form in light of the subject matter before the Committee. NQF may not know all of the measures that will be submitted for endorsement when we collect this information.

The questions in the Disclosure of Interest Form will focus on whether:

(1) You contributed directly and substantially to the development of a measure or measures being considered for endorsement.

EXAMPLES:

→ You worked on the measure as the developer’s employee.

- You directly collaborated with the developer to create or refine the measure, e.g., served on a committee that advised the developer regarding the measure.
- You worked on the measure as the developer's consultant.

(2) You or your spouse, domestic partner, or child could receive a direct financial benefit from a measure being endorsed or not endorsed.

EXAMPLE:

- You own stock in a company that will benefit from the measure being endorsed.

(3) You have received in the last 5 years an indirect financial benefit, i.e., not related to the measure under consideration, of \$10,000 or more from a measure developer whose measure is under consideration, or an indirect financial benefit of \$10,000 or more, in the aggregate, from an organization or individual that may benefit from a measure being endorsed or not endorsed.

EXAMPLE:

- You have received \$20,000 in consulting fees from the measure developer in the last 5 years for work unrelated to the measure being considered.

(4) You are currently employed by the measure developer and the developer has created the measure(s) under review, has created measure(s) in the topical area under review, or has created measure(s) that compete with measure(s) created by another developer and under review.

If the answer to any of these questions is yes, NQF will require you to recuse yourself from the discussion and any voting regarding the applicable measure or measures, and in some instances competing and related measures. If the answer to all of these questions is no, you will not be asked to recuse yourself due to conflict of interest. NQF expects that Committee members who have been appointed to the Committee should be able to review most measures under consideration by their Committee.

In addition, NQF will ask you information about your professional activities and relevant technical, advisory, or expert panel work in which you have participated. NQF may make information collected through the Disclosure of Interest Form public, including by posting the information on its website, so that your Committee colleagues and the public may better understand your background. NQF will not make specific financial information public, such as

amounts of stock, but may reveal the existence of a financial holding or relationship, such as stock ownership or a consulting contract.

NQF uses the Measure-Specific Questionnaire to further assure that Committee members do not have a conflict of interest. Committee members will receive a Measure-Specific Questionnaire once staff knows which measures will come before the Committee. The Measure-Specific Questionnaire is an easy to complete form that consists of a list of measures with “check the box” questions regarding your involvement with each measure. NQF will require Committee members who have a conflict of interest to recuse themselves from discussion and any voting associated with those measures.

Finally, Committee members must orally disclose relevant interests at a public Committee meeting. This general disclosure typically occurs at a Committee’s first public meeting. The General Counsel or other senior staff will lead this disclosure and instruct Committee members regarding information that should be disclosed. Following oral disclosure by Committee members, NQF will invite Committee members to ask questions of each other or NQF staff regarding any disclosures made by Committee members. Staff will also instruct the Committee members to speak up in real time in a Committee meeting or to the Committee chair or NQF staff if a fellow Committee member appears conflicted or is acting in a biased manner. Committee members who have conflicts with specific measures as determined by the Measure-Specific Questionnaire must publicly recuse themselves from discussion and any voting associated with those measures. NQF will post transcripts of these public meetings on the NQF public website.