



## **CONFLICT OF INTEREST POLICY FOR SUBJECT MATTER EXPERTS OF MEASURE APPLICATIONS PARTNERSHIP (MAP)**

### **Introduction**

The National Quality Forum (“NQF”) convenes a Measure Applications Partnership (“MAP” or the “Partnership”) to provide input to the Department of Health and Human Services on the selection of performance measures for use in Federal programs. In order for NQF to maintain a Partnership that is balanced and transparent, NQF has created this Conflict of Interest Policy (the “Policy”) for Subject Matter Experts who serve on MAP. A disclosure form specific to MAP subject matter experts for use by potential and current members of MAP.

The MAP represents key healthcare stakeholder organizations from the public and private sectors and strives to represent a balance of organizational viewpoints and interests. Legislation authorizing the creation of MAP states that it must include organizations affected by the use of performance measures. The Partnership includes both Organizational Representatives and those who sit as subject matter experts (SMEs), as explained in more detail later in this Policy.

The Policy is intended to prompt MAP subject matter experts to think about their interests and involvement in organizations and activities outside of NQF. NQF understands that these interests may be numerous and related to SMEs’ professional expertise, and that this is the very reason for nomination or appointment to MAP.

### **Disclosure Requirement**

NQF requires potential and current SMEs to disclose in writing certain interests that may be relevant to their service on MAP. The fact that a potential or current SME discloses does not mean that a conflict of interest exists or that the individual cannot serve on MAP. However, if NQF determines that you have a conflict of interest, you may not be seated on MAP, or you may be required to recuse yourself from the discussion of a particular matter before the MAP.

## **Policy for Subject Matter Experts**

Subject matter experts, or SMEs, sit on MAP as individuals and do not represent the interest of any group, including an employer. Because SMEs sit as individual experts, NQF requires a much more detailed disclosure of interest from these participants.

For SMEs, 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.

Subject matter experts who wish to be considered for membership on MAP must complete the Disclosure Form for subject matter experts. If an individual is selected as a subject matter expert, any changes or new information relevant to the disclosure of interest process – e.g., new employment, new consulting relationships, etc. – must be reported promptly to NQF staff.

## **Procedure for Disclosure of Interest**

Potential subject matter experts will complete a Disclosure Form tailored to SMEs upon nomination to MAP. Current SMEs will complete an updated SME Disclosure Form annually. To the extent that any information provided on the Form changes, the Member must inform NQF staff of the change within seven (7) days. The subject matter expert may be required to complete an updated Disclosure Form.

The General Counsel and NQF staff will review the Disclosure Forms.

A subject matter expert should feel free to raise concerns about conflicts of interest or bias at any time, including during a committee or panel meeting.

## **Discussion of Interests**

At the first public meeting of each MAP committee, workgroup or task force following annual approval of the MAP Roster by the NQF Board of Directors, NQF will ask each SME to orally disclose interests that are relevant to the work of the committee or panel. If NQF identifies the need for an additional oral disclosure of interest, SMEs will participate in such a discussion. Under some circumstances, such as the addition of committee or panel members, this oral disclosure may occur more frequently.