



CORE QUALITY MEASURES COLLABORATIVE CONFLICT OF INTEREST POLICY

The Core Quality Measures Collaborative (“CQMC”) utilizes stakeholder representatives on its Steering Committee and on its Workgroups (henceforth referred to individually as a “Committee” and collectively as “Committees”). Given the CQMC’s important work analyzing, curating, and working for the improvement of performance measures, it is important that such stakeholder representatives bring both expertise and a variety of perspectives to their work. At the same time, the CQMC recognizes that some persons may have a conflict of interest that makes it inappropriate for them to serve on a Committee. Other persons may have a more limited conflict of interest that does not impede their service on a Committee, but does require their removal from the process of considering a particular measure or other items.

This Conflict of Interest Policy (the “Policy”) is an important part of the CQMC’s work both in assembling the Committees and in determining how they operate when considering particular 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, the CQMC asks each participant to complete a Disclosure of Interest Form as part of serving on Committees and to update the form annually.

The CQMC will ask you a series of questions in the Disclosure of Interest Form in order to determine if you have a real or perceived conflict of interest. CQMC Workgroup co-chairs or Steering Committee chairs will review the Disclosure of Interest Form, initially in determining whether service is appropriate, and subsequently in light of the subject matter before the Committee, as appropriate.

The questions on the Disclosure of Interest Form will focus on activities or relationships that you have or have had in the recent past that are directly related to the subject matter before the Committee. For example, the Committee may consider a framework that involves a

measure developed by a particular entity. You have a previously had a consulting contract with that entity. You should disclose that interest as it is relevant to the Committee's work.

In addition, the CQMC will ask you information about your professional activities and relevant technical, advisory, or expert panel work in which you have participated. The CQMC 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. The CQMC 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.

Finally, Committee members must disclose relevant interests prior to each Committee meeting based on the subject matter to be covered that meeting. It is the responsibility of each Committee member to disclose such conflicts. CQMC Workgroup co-chairs or Steering Committee chairs will determine whether it is appropriate to remove an individual from the proceedings (or a portion of the proceedings), based upon the disclosures made.