

CONFLICT OF INTEREST POLICY FOR NON-MEASURE ENDORSEMENT COMMITTEES

The National Quality Forum ("NQF") relies on volunteer committees for assistance in accomplishing NQF's work. Many of these committees are involved in measure evaluation as part of NQF's consensus development process or in recommendations about measure use for the Measure Applications Partnership ("MAP"). Other non-measure endorsement committees also assist with NQF's work, including creating and reviewing frameworks and practices. This Conflict of Interest Policy (the "Policy") is an important part of assembling these non-measure endorsement committees.

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 complete a Disclosure of Interest Form when submitting an application to serve on an NQF Committee and update the form annually upon NQF's request.

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.

The questions on the Disclosure of Interest Form will focus on activities or relationships that you have or have had in the past that are directly related to the subject matter before the Committee. For example, the Committee may consider a framework that involves health information technology (HIT). You have a consulting contract with two major HIT vendors. You should disclose that interest as it is relevant to the Committee's work.

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.

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.