



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 Consortium or acting on behalf of Consortium shall not have direct involvement with and/or participate in any decision-making capacity regarding accreditation if they have an actual or potential conflict of interest with the program. Examples of actual or potential conflicts of interest include, but are not limited to:

- Employment with, or serving as a mentor or supervisor, involving the organization under review;
- Being a current or former trainee of the governing organization under review;
- Having been paid or otherwise profited or appeared to have profited from service in the past three (3) years to the training unit or clinical program that is under review;
- Having a current financial interest in the governing organization 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.

Procedures

Duty to Disclose

In connection with any actual or possible conflict of interest, an “interested” person must disclose to the Accreditation Committee Chair the existence of the professional or financial interest as soon as the conflict or potential conflict becomes apparent. This disclosure is submitted and/or recorded on the Conflict of Interest Disclosure Form ([hyperlink](#)). The Accreditation Chair will then forward a copy of the Disclosure form to the Board Chair and the Executive Director. These three (3) individuals or designees will comprise the Conflict of Interest Review Panel. The person of interest will be given the opportunity to disclose all relevant facts to the Conflict of Interest Panel.

Determining Whether a Conflict of Interest Exists

After disclosure of the professional and financial interest 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 Committee and Board of Directors will be informed of the disclosure and resultant action at their next regularly scheduled meetings.

Procedures for Addressing the Conflict of Interest

- a. An interested person 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 conflict of interest.
- b. The Conflict of Interest Panel shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the Conflict of Interest Panel shall determine whether the Consortium can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. 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 of the disinterested directors, whether the transaction or arrangement is in the Consortium'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.

Violations of the Conflicts of Interest Policy

- a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Records of Proceedings

The minutes of the governing board and all committees with board-delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a professional or financial interest in connection with the Consortium's accreditation activities, the nature of the professional or financial interest, any action taken to determine whether a conflict of interest was present, and the Conflict of Interest Panel's decision as to whether a conflict of interest in fact existed.
- b. 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, and a record of any votes taken in connection with the proceedings.