

CONFLICT OF INTEREST POLICY

Effective Date: October 2012

The integrity and the credibility of Hospice Medical Director Certification Board (HMDCB), its certification program, and the activities it undertakes depend on the avoidance of conflict of interests, or even the appearance of such conflicts, by the individuals involved in those activities.

It is recognized, however, that elected and appointed leaders, as well as other individuals acting on its behalf, also have significant professional, business and personal interests and relationships and activities. Therefore, actual, potential or apparent conflicts of interest should be addressed initially through liberal disclosure of any relationship or interest that might be construed as resulting in such a conflict.

Individuals serving on the Board of Directors or any committee will be asked to execute a disclosure both at the time of their appointment and annually thereafter. In addition, individuals are expected to promptly disclose any relevant changes that develop over the course of their appointment. It is the responsibility of each individual to identify potential and actual conflicts of interest and to comply with the established policy described below.

Financial Interests

Financial interests relate to relationships present today or at any time within the past 12 months. They do not apply to the individual's principal employment. Individuals will be asked to disclose whether any of the following exist for themselves or their spouse/partner:

1. Ownership interests (including stock, options or similar interest) in a company, having a commercial interest in an activity or matter that may give rise to an actual, potential or perceived conflict with HMDCB's activities
2. Employment, full or part-time, with a company that may give rise to an actual, potential or perceived conflict with HMDCB's activities
3. Current or proposed consultancy arrangements, as well as consulting performed
4. Receipt of honoraria or other reasonable payments for seminar presentations, speeches, or appearances
5. Any leadership role in, or other relationship with, another organization or entity (e.g., board member, committee member, advisor) directly or indirectly related to HMDCB or within the field of hospice and palliative medicine

In most instances, disclosure of the conflicting or potentially conflicting interest will itself suffice to protect HMDCB's interests. In other words, once such a conflict is fully disclosed to the relevant parties, they generally will be able to evaluate the possible influence of the disclosed interest. In situations where such disclosure does not adequately deal with actual or potential problems, however, additional action, including denial of participation in the affected activity or consideration of the matter, may be necessary.

In order to facilitate implementation of the Conflict of Interest Policy, the Board or its designee(s) shall determine, based on the appropriate disclosure form and other relevant information, when an individual engaged in, or about to engage in, an activity or other matter under consideration has an actual, potential, or perceived conflict of interest requiring some response by the Board. Specifically, subject to the procedures set forth here, the Board or its designee(s) may require any action they deem appropriate,

including, but not limited to, the following:

1. Disclosure of the interest to the other participants in the decision- or policy-making body (e.g., board, committee).
2. Recusal from voting on a matter and limitation of the individual's participation providing factual information of benefit to the group discussion.
3. Complete recusal from a portion of a meeting or from other consideration of the subject matter.
4. Replacement of the individual in the affected position or activity.

Academic Interests

Protecting the integrity and credibility of HMDCB's certification program is essential to its success. Involvement of Board or committee members in some types of educational programs could create the perception of unfair advantage to program participants, specifically educational activities designed to prepare individuals to take the HMDCB examination.

The following guidelines apply to all Board and committee members who have significant knowledge about questions on the certification examination and remain in effect for two years after completion of their volunteer activity.

1. Individuals must not participate in educational activities that are designed and/or advertised to prepare for certification or recertification examinations. This includes teaching, developing course outline or enduring materials.
2. Individuals must use careful judgment when considering involvement in broad-based comprehensive educational activities in hospice and palliative medicine that are not specifically advertised as preparation for certification or recertification examinations:
 - ✓ If the curriculum and timing of a course suggest that it will be seen as exam preparation, members must refrain from involvement
 - ✓ Individuals shall not serve as course chair or personally organize such a course to avoid the perception that the curriculum reflects the content of the examination
 - ✓ Individuals may teach in courses that focus on recent advances or updates in the field, as such courses do not include material viewed as appropriate for examination
3. Individuals must not participate in the preparation of self-assessment products for organizations other than HMDCB
4. Individuals must not allow use of their HMDCB affiliation for promotion of programs, products or publications. They must, however, always identify their role when participating in activities permitted under this policy.

These guidelines are not meant to restrict normal activities associated with the individual's professional responsibilities, including education and research except where there is an explicit or implied indication that the material covered is designed to help pass the HMDCB examination.

Individuals who violate HMDCB Conflict of Interest policy may be removed from their affected position or activity as deemed appropriate by the Board of Directors.

If uncertain about these policies, individuals are urged to seek the advice of the Board President or Executive Director.

Confidentiality

Each member of the HMDCB's Board of Directors or committees must agree to treat all confidential and proprietary information owned, possessed or used by the Board or its committees as highly confidential and must not divulge the information to any party outside of the Board or committee he/she serves on. If the member does not agree with these provisions, he/she will not participate in the development process.