



PUBLIC HEALTH ACCREDITATION BOARD CONFLICT OF INTEREST POLICY

Background

In their capacity as directors, officers, committee members, volunteers, and senior staff members, the volunteer leaders and staff of the Public Health Accreditation Board (“PHAB”) must act at all times in the best interests of PHAB. Moreover, the Board of Directors of PHAB has an obligation to ensure that the organization maintains a bias-free decision-making process. The purpose of this policy is to inform the volunteer leaders and staff of PHAB about what constitutes a conflict of interest, assist them in identifying and disclosing actual and potential conflicts, and help them to avoid conflicts of interest where necessary.

Conflicts of Interest Generally

A conflict of interest is a transaction or relationship which presents or may present a conflict between an individual's obligations to PHAB and his or her personal, business or other interests. A conflict of interest may arise when an individual has some other interest that might suggest divided loyalty on the part of the individual between obligations to PHAB, on one hand, and to some other organization or cause, on the other. The “other interest” may arise from a transaction between PHAB and a third party, or an individual's volunteer or paid relationship with a third party, which may compromise his or her ability to provide unbiased and undivided loyalty to PHAB.

Statement of Disclosure

The Board of Directors of PHAB requires all directors, officers, and key employees to complete and submit an annual Statement of Disclosure to reflect any facts or circumstances that might reflect an actual, potential, or apparent conflict of interest. The Board of Directors of PHAB further requires that directors, officers, and key employees submit an amended Statement of Disclosure to reflect any material changes or additions to the submitted information that may arise during the course of the year. Officers, directors, and key staff are encouraged to err on the side of disclosure and to report any set of circumstances that may appear to pose a conflict of interest, even if there is uncertainty about whether such circumstances should be disclosed.

The Executive Committee of PHAB will review each Statement of Disclosure for any set of facts or circumstances that may reflect an actual, potential, or apparent conflict of interest. The Executive Committee may request the assistance of legal counsel to identify potential conflicts. When evaluating a particular set of facts or circumstances, the Executive Committee shall consider the following non-exhaustive list of factors that may indicate a conflict of interest:

- Solicitation or acceptance of gifts or other items of value that may create an appearance or expectation of special treatment in PHAB matters;
- Any incident of abuse or misuse of a leadership position for personal or third party gain or benefit;
- Situations in which a director, officer, or key employee may be divided between personal interests of another organization and the best interests of PHAB;
- Business, professional, or other activities that would materially and adversely affect PHAB, either directly or indirectly; and,
- Any arrangement in which a director, officer, or key employee provides goods or services to PHAB as a paid vendor.

Resolution of Conflicts

The Executive Committee may request additional information from any director, officer, or key employee at any time; however, no individual whose relationships are under review may participate in deliberations, debate or any vote of the Executive Committee while such review is pending.

If the Executive Committee identifies an actual, potential, or apparent conflict of interest, it may take any one of the following actions to resolve the conflict:

- Waive the conflict of interest as unlikely to affect the director, officer or key employee's ability to act in the best interest of PHAB;
- Determine that the director or officer should be recused from all deliberation and decision-making related to the particular transaction or relationship that gives rise to the conflict of interest. This course of action should apply particularly when the transaction or relationship is one which presents a conflict only with respect to one or two discrete programs or activities; or,
- Determine that the individual director or officer must resign from his or her services to PHAB. This course of action should apply only when the conflict is so pervasive that the director or officer would likely seldom, if ever, be able to act solely in the best interests of PHAB.

The Board of Directors of PHAB reserves final authority over the resolution of all conflicts of interest involving a director or officer of PHAB. The Board of Directors may overrule any decision of the Executive Committee with regards to any actual, potential, or apparent conflict of interest and the Executive Committee may refer any such matter to the Board of Directors at any time.

Directors or Officers Doing Business with PHAB

A conflict of interest exists anytime a director or officer seeks to enter into a business relationship with PHAB. Similar conflicts may arise through family members or through

organizations in which directors or officers serve in leadership, employment or ownership capacity.

Such conflicts do not, however, necessarily preclude a business relationship with PHAB. The following procedure is designed to help resolve conflicts of interest whenever a director or officer (or a related party) seeks to provide goods or services to PHAB as a paid vendor or applies to receive a significant grant or contract from the organization:

- The director or officer must promptly disclose the intent to enter into a business relationship with PHAB either to the Executive Committee or to the Board of Directors or both.
- The director or officer must recuse himself or herself from all deliberation, debate, and voting related to the contemplated business relationship.
- The Board of Directors must determine, without the presence or participation of the director or officer that the transaction is fair and in the best interest of PHAB.
- If the Board of Directors approves the business relationship under consideration, the director or officer may not participate in any process by which his or her performance as a vendor, grantee, or contractor is evaluated, or in any such evaluation of a related party.

On an annual basis, all officers, directors and key employee shall be provided with a copy of this policy and required to complete and sign the acknowledgment and disclosure form below. All completed forms, as well as all other conflict information provided, shall be provided to and reviewed by the PHAB Executive Committee and be kept on file in the PHAB office.

Approved by the Board of Directors November 2009

Reviewed by the Executive Committee July 2013

Approved by the Board of Directors September 2013

List of Third Parties Providing Significant Goods or Services to PHAB

Robert Wood Johnson Foundation (RWJF)
Centers for Disease Control and Prevention (CDC)
Department of Defense (DOD)
Liaison International (the e-PHAB vendor)
National Association of Convenience Stores, Inc. (PHAB's landlord)
Venable, LLP (legal counsel)
Ntiva (Office IT vendor)
NORC at the University of Chicago (the external evaluator)
University of Kentucky (CE Central and PHNCI)
GYMR (Get Your Message Right) (communications consultant)
PSI, Inc. (DIS certification consultant)
American Nurses Credentialing Center (DIS certification consultant)



CONFLICT OF INTEREST STATEMENT OF DISCLOSURE FORM

As a director, officer, employee, or volunteer of PHAB, I have read the foregoing Conflict of Interest (COI) Policy and understand that I am obligated to disclose the existence of any facts or circumstances that may constitute a conflict of interest, as the term is defined in the COI Policy above. I am also required to notify the Executive Committee or the Board of Directors of PHAB in the event of any material changes to the responses I provide in this statement.

- I have the following financial interests in third parties providing good or services to PHAB:

None _____

Disclosure:

- I own at least one percent interest in the following entities or organizations that may have conflicting interest with those of PHAB, or take public positions contrary to those of PHAB:

None _____

Disclosure:

- I expect to receive compensation from PHAB in the following amount, not including reimbursement for reasonable expenses for being a board member:

None _____

Disclosure:

- The following members of my family expect to receive some form of compensation or material financial benefit from PHAB:

None _____

Disclosure:

- Outside of my capacity as a director or officer, I have a family relationship or business relationship with the following directors or key officers of PHAB:

None: _____

Disclosure:

- I serve in a leadership capacity with the following companies or organizations that might have a conflicting interest with or hold public positions contrary to those of PHAB:

None: _____

Disclosure:

- I currently or have served (within the last five years) on the following boards, committees, work groups, etc. whose business is related whole or in part to public health accreditation, public health quality improvement and/or public health performance management:

None: _____

Disclosure:

- I am currently employed or consult with the following health departments:

None: _____

Disclosure:

- I was formerly employed or consulted with (in the last five years) the following health departments:

None: _____

Disclosure:

- I wish to disclose the following additional facts or circumstances:

None_____

Disclosure:

Signature

Date

Printed Name

Position

Approved by the Board of Directors 2010
Reviewed and Revised by the Executive Committee July 2013
Approved by the Board of Directors September 2013
Updated January 2014
Updated January 2015
Updated January 2016