

AMERICAN ASSOCIATION FOR ACCREDITATION OF AMBULATORY SURGERY FACILITIES

<u>Policy on Conflicts of Interest, Disclosure of</u> Relationships and Confidentiality for Surveyors

QUAD A Global Accreditation Authority ("QUAD A") is committed to maintaining the integrity of its accreditation process and to maintaining public confidence in its accrediting decisions. Therefore, it has always been and continues to be important to identify and address actual or potential conflicts of interest that might improperly affect the decisions of individuals involved in the accrediting process, specifically including surveyors who conduct surveys of facilities seeking QUAD A accreditation. It is also critical to maintain the confidentiality of the accreditation process and to assure information obtained during the conduct of a survey is not disclosed to third parties not involved in the accreditation process.

Definition of a Conflict of Interest

A conflict of interest is defined as an interest or relationship, including financial and consulting relationships, held or maintained by a surveyor that could influence the surveyor or be perceived as influencing the surveyor to act for the surveyor's personal benefit or contrary to the goal of QUAD A to conduct fair, impartial and unbiased surveys of facilities seeking accreditation. Conflicts of interest are not confined to financial or economic interests but include relationships or affiliations with organizations with competing or conflicting goals and personal and professional relationships. All decisions as to whether a surveyor's interest or relationship constitutes a conflict of interest shall be made by QUAD A

Duty to Disclose Conflicting Interests

Each surveyor shall disclose all actual or potential conflicts of interest that could influence or be perceived to influence the surveyor's decision-making process. Sources of possible conflicting interests include, but are not limited to, a consulting, investment or other commercial relationship with a company providing goods and services to QUAD A accredited facilities; consulting relationships with QUAD A accredited facilities; or a financial interest or practice position in an accredited facility that may compete with the surveyed facility. The foregoing examples are illustrative and should not be considered the only interests which might give rise to a conflict.

Disclosure Statement and Affirmation of Confidentiality

Each surveyor will be required to sign and submit to the Executive Director of QUAD A not less than annually a disclosure statement and affirmation of confidentiality in the form attached hereto as Exhibit A (the "Statement"). Failure or refusal to sign and submit the Statement will automatically disqualify an individual from serving as a surveyor. The Board of Directors of QUAD A may from time to time amend the content and form of the Statement. The Statement will be kept confidential except for review by the President and Executive Director of QUAD A who shall in turn maintain the confidentiality of the information contained in the statement.

Signature:		Date:	
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