CONFLICT OF INTEREST POLICY FOR INTERESTED PARTIES COMMITTEES

April 15, 2026

As a consensus-based entity (CBE) on contract 75FCMC23C0010 with the Centers for Medicare & Medicaid Services (CMS), Battelle Memorial Institute ("Battelle") convenes several committees of Interested Parties (IPs) to provide input on (1) measure endorsement decisions of quality performance measures, (2) the selection of quality measures for a pre-rulemaking process, which is required by Social Security Act Sections 1890(b)(7) and 1890A, and (3) a measure removal process, which is defined in Section 1890 (b) of the Social Security Act. This Conflict of Interest Policy (the "Policy") is applicable to such committees to ensure the committee performs its functions in a manner free from bias and undue influence. As a committee member, you must attest that you will follow this policy and provide the requisite information necessary for Battelle to conduct a conflict of interest (COI) review.

The term "conflict of interest" means any financial or other interest that 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. Disclosure of a financial interest does not automatically mean a COI exists but may warrant further discussion and review.

If you are an interested party serving on a committee that evaluates measures for endorsement and/or provides recommendations for pre-rulemaking, you must complete a Personal/Organizational Disclosure of Interest Form when submitting an application to serve on a committee and update the form annually. Additionally, each cycle, committee members will be asked to complete a Measure Disclosure of Interest Form for each measure, or batch of measures, assigned to that committee This form will contain questions relevant to the specific measure(s) being reviewed. Battelle will provide the Measure Disclosure of Interest Form to committees at the start of each cycle.

The Disclosure of Interest Forms will contain questions regarding your financial interests and business associations that may present a perceived or actual COI.

The questions in the Disclosure of Interest Forms will focus on whether:

(1) You contributed directly and substantially to the development of a measure or measures being considered for endorsement or measure or measures under consideration for selection or removal. For example,

- You worked on the measure as an employee of the measure development organization.
- You directly collaborated with the measure development organization to create or refine the measure.
- You worked on the measure as a consultant for the measure development organization.

(2) You or your spouse, domestic partner, or child could receive a direct financial benefit from a measure being recommended for selection or removal or endorsement. For example,

- You own stock in a company that has a financial interest in the measure being endorsed or not endorsed.

(3) In the last 5 years you have received an indirect financial benefit, i.e., not related to the measure under review, of $10,000 or more from a measure developer whose measure is under review, or an indirect financial benefit of $10,000 or more, in the aggregate, from an organization or individual that may benefit from a measure being endorsed or not endorsed or being considered for the selection or removal process. For example,

- You have received $20,000 in consulting fees from the measure developer in the last 5 years for work unrelated to the measure being reviewed.

(4) You are currently employed by the measure developer and the developer has created the measure(s) under review, has created measure(s) in the topical area under review, or has created measure(s) that compete with measure(s) created by another developer.

By participating as a committee member, you consent to public disclosure of general information about your financial or business interests, professional associations, and experiences that may be of interest to the public regarding COI. You must also announce your organizational affiliation and any organizational COIs. Unless Battelle is legally required to do so by an authoritative entity, Battelle will not provide your specific financial information to the public, but financial relationships may be subject to disclosure.

If you provide information that creates a perceived or actual COI, Battelle requires you recuse yourself from any voting regarding the applicable measure or measures and, in some instances, competing and related measures. However, you may still contribute to the discussion of the measure(s). Committee members who have conflicts with specific measures, as determined by the Measure Disclosure of Interest Form, must publicly recuse themselves from any voting associated with those measures. However, this does not prohibit you from submitting public comments for the committee's consideration.

Additionally, you must orally disclose relevant interests at a public committee meeting. The disclosure usually occurs at each committee's public meeting. Senior staff will lead this disclosure and instruct you regarding information that you should disclose.

Finally, you have an ongoing duty to monitor for COI issues pertaining to yourself and fellow committee members and raise or disclose any issues either in a committee meeting, to the committee chair, the Battelle program team, or the Battelle legal department. You should take a proactive approach and report any instances if a fellow committee member appears conflicted or is acting in a biased manner.