

Alliance for Home Health Quality and Innovation – Conflict of Interest Policy

The directors, officers, committee members, and volunteers of the Alliance for Home Health Quality and Innovation, while acting on behalf of the Alliance must avoid conflicts of interest. Even the appearance of a conflict of interest must be avoided. All actions by directors, officers and other individuals with the ability to influence the affairs of the Alliance (i.e., insiders) must be based solely on the best interests of the Alliance, in accordance with applicable state and federal laws and regulations. Actions must not be influenced by personal considerations.

A conflict of interest occurs whenever an individual has a direct or indirect interest, financial or otherwise, in the outcome of any transaction or matter involving the Alliance. A conflict of interest also occurs whenever an individual has a relationship with other parties to the transaction or matter such that the relationship might reasonably be expected to affect the judgment of the individual in the particular transaction or matter in a manner adverse to the Alliance.

If an individual has a conflict of interest or potential conflict of interest in connection with any Alliance transaction or matter, he/she must immediately notify the Chairman, or the Board of Directors, and disclose all the material facts concerning the actual or potential conflict of interest and his/her relationship to the transaction or matter at issue.

If the conflict of interest arises in connection with the activities of any deliberative body (e.g., the Board of Directors), the individual with the conflict must immediately disclose the conflict to the other members of the body and the individual ordinarily will not participate in the deliberation or consideration of the matter unless specifically authorized by the deliberative body. Under no circumstances may an individual vote on the transaction or matter at issue. A notation must be made in the minutes of any meeting at which deliberation, consideration or vote on the transaction or matter at issue is undertaken indicating that the individual with a conflict or potential conflict of interest was excused from the meeting during the time that consideration of the transaction or matter was undertaken and took no part in any discussion pertaining to the transaction or matter (unless specifically authorized to stay), and refrained from voting on the transaction or matter.

The Alliance has instituted a Mandatory Disclosure Policy under which each of the following categories of individuals will be required on an annual basis to sign and submit a Mandatory Disclosure Statement (sample attached) to the Chairman:

1. Board of Directors
2. Officers

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3. Staff and specific appointees as designated by the Chairman or the Board of Directors.

The Secretary shall maintain and annually update a file of Mandatory Disclosure Statements signed by each above-named individual.

Conflict of Interest Mandatory Disclosure Statement

I have read the Alliance for Home Health Quality and Innovation Conflict of Interest Policy and I support its intent.

I hereby certify that to the best of my knowledge, I do not have any financial or other interest, direct or indirect, that raises an actual or potential conflict of interest with my activities on behalf of the Alliance. If any actual or potential conflict of interest exists, the conflict as well as the financial or other interest upon which it is based are listed below and are more fully described in the written statement I have attached to this form.

If an actual or potential conflict of interest subsequently develops, I will promptly submit an amended Mandatory Disclosure Statement to the Chairman, or the Board of Directors.

As directed and where appropriate, I will make disclosure of the conflict of interest to fellow members of the Alliance deliberative bodies.

Signature and Title

Date