TITLE: CONSORTIUM-PSO Conflict of Interest Policies and Procedures

EFFECTIVE DATE: September 1, 2009

Purpose:

To ensure that in pursuit of its mission, the Consortium-PSO will not create a conflict of interest with the rest of the Task Force and to ensure that the Consortium-PSO will fully disclose to the HHS Secretary ("Secretary") any financial, contractual, or reporting relationships the Consortium-PSO has with a participating healthcare provider and, if applicable, the fact that the Consortium PSO is not operated independently, controlled independently, or managed independently from any participating healthcare provider.

Policy:

The Consortium-PSO is seeking to establish itself as a PSO listed by the Secretary of Health and Human Services ("Secretary") as a component of the Task Force. The Consortium-PSO shall ensure that the pursuit of its mission will not create a conflict of interest with the Task Force, in accordance with the Patient Safety Act.

Procedures:

(1) The Task Force has as its purpose to improve access to and quality of breast cancer screening and treatment for all women across the Metropolitan Chicago area and reduce morbidity and mortality rates for all women in the Metropolitan Chicago area.

(2) The Consortium has as its purpose to bring health care providers from the Metropolitan Chicago area together to collaborate on improving the quality of breast cancer screening and treatment by sharing data on quality measures for breast cancer screening and treatment and developing quality improvement projects based on analysis of this data.

(3) The Consortium is a division of the Task Force and acts on behalf of the Task Force. Under the Patient Safety Act, the Task Force is the "parent organization" and the Consortium is its "component organization." (See attached Task Force/Consortium organizational chart).

(4) The Consortium-PSO shall ensure its mission and primary activity is to conduct activities that improve patient safety and the quality of healthcare delivery in participating healthcare providers through patient safety and quality activities.

(5) The Consortium-PSO activities are directed by the Consortium-PSO Director in consultation with the Consortium Steering Committee. Hiring of staff and supervision of Consortium-PSO staff is a duty of the Consortium-PSO Director. Decisions regarding the Consortium-PSO’s
budget are made by the Consortium-PSO Director in collaboration and with the agreement of the Consortium Steering Committee.

(6) The Consortium-PSO shall ensure that its mission does not create a conflict of interest with the Task Force in accordance with the Patient Safety Act.

(7) The Consortium-PSO will submit a disclosure statement to the Secretary under the following circumstances:

(a) the PSO has entered into a contract with a provider pursuant to the Patient Safety Act and

(b) the PSO has other financial, contractual, or reporting relationships with that participating healthcare provider; or

(c) the PSO is not managed independently, controlled independently, or does not operate independently from that participating healthcare provider.