

Provider Led Entity

Conflict of Interest Disclosure Policy and Intellectual Property Assignment

Please read this document in its entirety and provide the requested information

Background:

As a federally-qualified provider led entity (“PLE”) for the purpose of developing Appropriate Use Criteria (“AUC”) to guide the ordering of applicable imaging services, the CDI Quality Institute (“Institute”) is required to identify potential conflicts of interest and resolve any such conflicts. Federal requirements also instruct that all PLE materials and subject expert names be publically reported on the Institute website.

This policy applies to members on the multidisciplinary team (the Institute’s “PLE Multi-Disciplinary Committee”) and any other party participating in the Institute’s AUC development or modification activities. You are being requested to complete this disclosure policy in connection with your participation in the Institute’s AUC development and modification activities. If your completed policy indicates the existence of a covered relationship, it might result in your disqualification from participation in some or all of the Institute’s AUC development or modification activities. It might also result in the information you provide being publicly posted on the Institute’s website and made available in timely fashion to a public request, for a period of not less than 5 years after the most recent published update of any AUC in which you participated in the developing or modifying.

Federal regulations specifically require that the Institute must collect the following information:

- Direct or indirect financial relationships that exist between individuals or the spouse or minor child of individuals who have substantively participated in the development of AUC and companies or organizations including the PLE and any other party participating in AUC development or modification that may financially benefit from the AUC. These financial relationships may include, for example, compensation arrangements such as salary, grant, speaking or consulting fees, contract, or collaboration agreements, and
- Ownership or investment interests between individuals or the spouse or minor child of individuals who have substantively participated in the development of AUC and companies or organizations including the PLE or any other party participating in AUC development or modification that may financially benefit from the AUC.

To comply with the Federal regulations, the Institute’s policy requests that you provide information regarding any “covered relationship” which includes any of the following, whether direct or indirect or through business, investment, or family:

- An ownership or investment interest in any entity with which the Institute or PLE Committee has a transaction or arrangement,

- A financial interest with the Institute, the PLE Committee or with any entity or individual with which the PLE Committee has a transaction or arrangement, including monetary remuneration, whether direct or indirect, as well as gifts or favors, with a reasonably estimated value greater than \$50,
- A potential ownership or investment interest in, or direct or indirect financial relationship with, any entity or individual with which the PLE Committee is negotiating a transaction or arrangement, or
- An ownership or investment interest or direct or indirect compensation arrangement with any other person or entity that may benefit from the Institute's development or modification of AUC.

This policy defines the term "Persons or entities that may benefit from the Institute's development or modification of AUC" to include the Institute; the Center for Diagnostic Imaging, Inc., and its affiliates; AIM Specialty Health, Inc.; other contracted providers of services to the PLE Multi-Disciplinary Committee; entities involved in the manufacture or marketing of diagnostic imaging equipment, supplies and services; medical groups whose physicians are members of the Institute; and any other person or entity meeting this definition.

Disclosure:

Please provide the following information:

1. Identifying information – your name, title, business or personal address, place of employment, and contact information:

2. Information regarding any covered relationship as defined above:

By signing and dating this Disclosure Form on page 3, you are representing that you have familiarized yourself with this conflict of interest policy, read the above background, and provided complete and, to the best of your knowledge, accurate information.

By signing and dating this Disclosure Form, you also are representing that you understand that, and consent to, your name and all PLE work products will be reported on the Institute website.

Intellectual Property: In the spirit of language outlined by the 2014 federal Protecting Access to Medicare Act (PAMA), the Institute, as a qualified PLE, may develop AUC, modify AUC developed by another qualified PLE, or endorse AUC developed by other qualified PLEs. The Institute may also license or otherwise convey rights in the AUC it creates to qualified Clinical Decision Support Mechanisms (CDSMs) or others. By signing and dating below, you also acknowledge that any contributions you make to the AUC and in connection with the development of the AUC are not owned or controlled by others and thus prohibitive for use by the Institute. You also acknowledge that any contributions made can and will be shared publically and broadly by the Institute. Further, you are assigning to the Institute all copyrights and other intellectual property rights generated by your PLE contributions so that the Institute may freely share and license AUC materials as allowed by federal regulation.

Signature: _____

Date: _____