

PQA
Policy on Conflicts of Interest
For the PQA Review Panel for Project: [Insert]

PQA welcomes your participation as a Reviewer on the PQA Review Panel for the PQA project entitled: [Insert]. As a participant in this activity, you will be asked to review proposals submitted by potential contractors and to make recommendations regarding the selection of recipients of contracts.

PQA will depend upon each Reviewer on the Review Panel to perform this work objectively, without an apparent or actual conflict of interest. This Policy on Conflicts of Interest for the Review Panel (the “Policy”) has been developed to identify potential problem areas for Reviewers.

A Reviewer cannot have a conflict of interest with any organization submitting a proposal and then serve on a PQA Review Panel. To this end, Reviewers must completely and accurately disclose any relationships, affiliations, transactions or other interests that could contribute to an actual or perceived conflict.

For purposes of this Policy, the term “conflict of interest” means any financial or other interest that (1) could significantly impede, or reasonably be thought to impede, the Reviewer’s objectivity; or (2) could create a significant unfair competitive advantage for any person or organization with which the Reviewer is associated.

General Guidelines on Conflicts of Interest

Direct Financial Relationship. A Reviewer shall not participate in any review of, or decision about, proposals where the Reviewer has a direct financial relationship with any organization submitting a proposal. A Reviewer has a “direct financial relationship” with an organization if he or she:

- is or was a beneficial owner of more than one percent of the equity of the organization within two (2) years preceding the date of the organization’s review by PQA;
- is or was an officer, director or trustee of the organization;
- is or was an employee or independent contractor of the organization within two (2) years preceding the date of the organization’s review by PQA;
- engages or has engaged in the sale or lease of real estate or personal property to the organization within two (2) years preceding the date of the organization’s review by PQA;
- furnishes or has furnished services or products to the organization within two (2) years preceding the date or the organization’s review by PQA and/or the organization is a known target for presentation/solicitation by the Reviewer to furnish serves or products;
- has or had a creditor-debtor relationship with the organization within two (2) years preceding the date of the organization’s review by PQA;

- receives or has ever received anything of value for performing his or her duties with respect to his or her review of the organization from anyone other than PQA; or
- has confidential, insider, or proprietary information about the organization or is aware of any facts or circumstances that impair the Reviewer’s impartiality with respect to the organization being reviewed.

Indirect Financial Relationship. A Reviewer should not participate in any review or decision where the Reviewer has an indirect financial relationship with any organization submitting a proposal. A Reviewer has an “indirect financial relationship” with an organization if he or she:

- has a direct financial relationship with a corporate parent, affiliate, subsidiary or any other organization that has a direct financial relationship with the organization to be reviewed (“Interested Organization”); or
- the Reviewer’s family (brother, sister, child, spouse (or similarly close person), parent, or other family Reviewer) has a direct financial relationship with the organization to be reviewed, a Competing Organization, or an Interested Organization.

Other Conflicts of Interest

- A Reviewer may not allow the prospect of future employment or remuneration from an organization to influence review of the organization.

Access to Confidential Information

Reviewers may have access to sensitive information and data regarding organizations reviewed by the Review Panel. Reviewers may use such information or data only for the purposes of Review Panel review or other purposes prescribed by PQA. No Reviewer shall use such information or data for the Reviewer’s director or indirect economic benefit, or the benefit of any person or organization associated with the Reviewer. No Reviewer shall disclose such information or data to other individuals or to organizations without the permission of PQA. The restrictions described above do not apply to information or data once it has entered the public domain.

Procedures for Addressing Conflicts of Interest

Whenever a Reviewer is unsure as to the existence of a conflict of interest, full disclosure shall be made in writing to the **PQA Executive Director**. The **PQA Executive Director** shall make a final determination regarding the existence of a conflict of interest. If a conflict of interest exists, the Reviewer shall not participate in the Review Panel.

I have reviewed and understand the above statements regarding potential and actual conflicts of interest.

Signature of Reviewer

Date