



DO I HAVE A CONFLICT OF INTEREST???



URAC has revised their IRO standards to be more specific regarding what constitutes a COI to include a **material professional, familial, or financial relationship** with any of the following:

- The referring entity;
- The insurance issuer or group health plan that is the subject of the review;
- The covered person or the covered person's authorized representative;
- Any officer, director, or management employee of the insurance issuer that is the subject of the review;
- The group health plan administrator, plan fiduciary, or plan employee;
- The medical group, or independent practice association ;
- The facility at which the recommended health care service and treatment would be or was provided;
- The developer or manufacturer of the principal drug, device, procedure, or other therapy being recommended for the covered person whose treatment is the subject of the review.
- A management role in a health plan of an insurance issuer or group health plan that is the subject of a review which includes participation on the board of directors or any sub-committee of that board and in advisory groups that provide guidance to a provider network, including credentialing, medical policy and quality management committees.
- Staff privileges at a facility where the recommended health care service or treatment would be provided if the insurance issuer or group health plan previous non-certification is reversed.

The following Q&As address the most common questions in determining if a COI exists.

Q: What if I'm listed as a provider for a health plan under review?

A: You may review the case as long as you don't stand to financially benefit from the outcome of the review. If you are an officer, director, manager, or on the Board or on a Subcommittee that provides guidance to a provider network (e.g., credentialing, medical policy, quality management, etc.) of the health plan, this would be a conflict of interest and you cannot review the case.

Q: Can I review a case if I am a reviewer for the health plan related to the case under review?

A: No, if you are a reviewer for the health plan related to the appeal, this would be considered a conflict of interest and you cannot review the case.

Q: I know the physician under review who provided the care for the patient, and I visit with him at meetings. Can I review his case?

A: The key here is "material professional relationship". Would you define your interaction with the physician as material? More important, could you be completely objective in reviewing the case? While this may not be a true conflict of interest, your objectivity could be called into question, and it would be best if you declared a COI and did not review the case.

Q: What if I have stock in a pharmaceutical company with a drug usage being questioned as being experimental / investigational?

A: This would be considered a potential conflict of interest because you have a professional interest, and therefore, you may have an indirect financial incentive for a particular determination.

Q: The case under review involves a patient of mine, but I am not the physician requesting the appeal. Can I review the case?

A: No, because you are a participating provider in the patient's care; this would be a conflict of interest.

Q: I have staff privileges at the facility where the recommended health care service or treatment would be provided. Can I review the case?

A: No. This would be considered a conflict of interest because you have a professional and financial relationship with the facility.

Q: I used to have staff privileges at the facility where the recommended health care service or treatment would be provided. Can I review the case?

A: No. While you no longer have staff privileges at the facility and therefore you no longer have a direct financial relationship, the fact that you previously had staff privileges would be considered a potential conflict of interest because you have had a professional relationship with the facility, and your objectivity could be called into question.

Q: Can I review a case if I use a manufacturer's device in my own practice, and medical necessity of the device is the subject of the review?

A: Yes, as long as you don't stand to financially benefit from the outcome of the review. The fact that you use the device under review does not in and of itself create a conflict of interest.

Q: What do I do if I identify what I believe to be a potential or real conflict of interest?

A: If any potential for a conflict of interest exists, do not take any action on the review. Immediately notify CIMRO at 1.800.635.9407 to discuss.