

AABB Firewall Policy

Purpose: The purpose of this firewall policy is to eliminate or minimize any real or apparent conflicts of interest between the AABB Accreditation and Standards Programs (A/S) and AABB Consulting Services (CS). The firewall policy is designed to prohibit the disclosure of information relating to: (1) decisions affecting a facility's underlying accreditation status or details of a facility's variance request to AABB staff other than staff required to facilitate the accreditation process or variance request, and (2) the identity of a CS client to AABB staff other than those required to serve the needs of the client and the administrative needs of CS. This policy applies only to facilities that are eligible for accreditation.

Ensuring the independence of the accreditation and standards-setting process on the one hand, and the activities of Consulting Services on the other, is vitally important to AABB, as is furthering the association's efforts to operate with transparency and integrity.

Responsibility: Responsibility for compliance with this policy shall rest with the Director, Human Resources, who shall conduct periodic assessments to ensure compliance. AABB's Whistleblower Policies shall govern the handling of complaints and grievances relating to this policy.

Definitions: For purposes of this policy and the processes and procedures that flow from it, the following definitions shall apply:

AABB Staff: The term includes AABB's staff, individuals working for AABB on a contract basis, volunteer assessors and the board of directors.

A/S Staff: The term includes A/S staff, as well as volunteer assessors.

CS Staff: The term includes CS staff, as well as those individuals working for CS on a contract basis.

Policy: The elements of this policy, which are set forth in the chart appearing on the following pages, are divided into three sections:

- Elements pertaining to A/S staff
- Elements pertaining to CS staff
- Elements pertaining to all AABB staff

This policy shall be reviewed externally every three years. In addition, this policy shall be made publicly available on the AABB Web site.

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Accreditation/Standards (A/S) Staff	Consulting Services (CS) Staff	AABB Staff
<ul style="list-style-type: none"> • A/S staff may not seek or solicit information regarding whether or not a facility has used CS services and may not request this information from CS staff. • Assessors are instructed that the use of CS's services is not considered in the accreditation process and does not guarantee a successful outcome of the assessment. • A/S staff shall be instructed that reports may not include information on whether or not assessed facilities are or have been clients of CS. • Accreditation staff may not discuss any facility assignments, or possible assignments, or any other confidential information relating to specific facilities, with any staff other than those required to facilitate the assessment. • Standards staff may not discuss any variance request with CS staff, unless such information is made publicly available by the organization requesting the variance. • If Accreditation staff are at a facility to conduct an assessment when CS staff are on site, arrangements shall be made immediately to physically separate the two groups and, whenever possible, CS staff will move off-site, remaining available to the facility for off-site consultation until the assessment is completed. • A/S offices shall be physically separate from CS offices and staff must maintain separate printers, fax machines, scanners and telephone numbers. A/S staff shall be restricted from accessing CS electronic files and are expected to visit CS offices only after making an appointment. 	<ul style="list-style-type: none"> • CS shall inform its clients that CS operates independently from A/S programs. Included in CS contracts shall be the statement that the provision of services does not guarantee a successful outcome for the facility's current or future accreditation status and that Accreditation staff is not informed by AABB and should not be informed by the client that it is a CS client. • CS staff may not communicate with A/S staff about specific facility accreditation decisions or variance requests not otherwise publicly available and may not discuss the choice of assessors or any other information relating to specific assessments with Accreditation staff and shall not interact with the assessors onsite. • CS staff may assist but may not <i>represent</i> facilities in challenging AABB's accreditation decisions or findings, resolving nonconformance findings or preparing facilities that have been denied accreditation for future assessments. • If Accreditation staff are at a facility to conduct an assessment when CS staff are on site, arrangements shall be made immediately to physically separate the two groups and, whenever possible, CS staff will move off-site, remaining available to the facility for off-site consultation until the assessment is completed. • CS offices shall be physically separate from A/S offices and staff must maintain separate printers, fax machines, scanners and telephone 	<ul style="list-style-type: none"> • The disclosure of information relating to decisions affecting a facility's underlying accreditation status or details of a variance request to AABB staff other than staff required to facilitate the accreditation process or variance request is prohibited. • Any AABB marketing material relating to A/S and/or CS shall clearly state that the two programs operate independently. • In interdepartmental meetings, AABB senior staff and board meetings, information that is tied to the identity of a facility being assessed or requesting a variance shall not be discussed. • Facility-specific information shall be securely maintained. • Staff shall receive annual training on this policy. • All AABB staff shall sign statements annually verifying that they have read and agree to comply with this policy.

- A/S Directors shall provide MIS with a list of current staff to allow monitoring of access.
 - Facility-specific information shall be securely maintained.
 - Staff who have access to CS financial and operational information as part of their role in providing services to CS may not disclose information that may identify specific facilities.
 - Any reference in A/S materials to CS is generally limited to acknowledging CS's existence, its services, and the reason for its creation.
 - A/S staff may not use the CS logo in their marketing materials.
 - In interdepartmental meetings, AABB senior staff and board meetings, information that may identify specific facilities being assessed or requesting variances shall not be disclosed.
 - A/S staff shall receive training regarding this firewall policy.
 - A/S staff shall sign statements annually verifying that they have read and agree to comply with this policy.
- numbers. CS staff shall be restricted from accessing A/S electronic files and are expected to visit A/S offices only after making an appointment.
- The CS Division Director shall provide MIS with a list of current staff to allow monitoring of access.
 - Facility-specific information shall be securely maintained.
 - Staff who have access to A/S financial and operational information as part of their role in providing services to those departments may not disclose facility-specific information to CS staff.
 - CS promotional materials are limited to identifying CS as an independent department of AABB and the independence of the A/S and CS programs shall be emphasized.
 - CS staff may not use the Accreditation logo in their marketing materials.
 - In interdepartmental meetings, AABB senior staff and board meetings, information that may identify specific clients of CS shall not be disclosed.
 - CS staff may discuss with A/S staff generic questions so long as no client-specific information is revealed.
 - CS staff shall receive training regarding this policy.
 - CS staff shall sign statements annually verifying that they have read and agree to comply with this policy.
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