BOARD OF PHARMACY SPECIALTIES

Policy on Conflict of Interest

Extracted from Operating Procedures

Document No.: OP-002

Effective Date: 03/31/2026

The BPS shall function under a Conflict-of-Interest Policy designed to ensure that no member of the BPS Board and Specialty Council Members, or by extension its committee members, BPS certification personnel or outsourced service providers will refrain from using their position or the knowledge gained from exposure in such a manner that is a conflict of interest between the interests of the organization or their personal interests. The intent of this policy is to ensure that BPS Board members, Specialty Council Members, certification staff, committee members and outsourced service providers place the interests of the organization foremost in any dealings involving or relating to the BPS.

A conflict of interest includes, but is not limited to, a financial or business benefit affected by the decision, or a personal relationship that might affect impartiality or objectivity in determining an outcome.

The following procedures outline the management of potential conflicts of interest and confidentiality of information with respect to BPS certification activities:

BPS Board of Directors and Specialty Council Members

1. No member of BPS' governance and organizational structure or one of its subject-matter-expert groups shall vote on any matter which will more than insignificantly affect, financially or otherwise, that individual or a member of that individual's family or the individual's employer. For example, voting on establishing the rate of certification fees would be considered insignificant, while voting on matters which will affect an organization of which the individual and his/her family owns at least 10% of the stock of the organization would be more than insignificant.
2. No member of BPS' governance and organizational structure or one of its subject-matter-expert groups shall vote on any matter which will materially affect, financially or otherwise, any business competitor of the Board or any customer of the Board for which those individual acts or serves in the capacity of an employee, a stockholder, a director, an owner, a partner, a committee member, or such other similar position.
3. No member of BPS' governance and organizational structure or one of its subject-matter-expert groups shall serve concurrently as an elected officer or member of a governing body (e.g., Board of Directors) for another organization that has a contractual relationship (e.g., professional development programs for recertification credit) with BPS. If such a situation arises, the BPS appointee must resign from one of the roles and notify BPS staff as soon as possible.
4. Except as provided by the Bylaws or Governing Policies, or approved by the Board, no full or part-time employee, officer, or consultant of the Board shall act or serve as a voting member of the Board.
5. No member of BPS' governance and organizational structure or one of its subject-matter-expert groups, during his/her term may represent himself/herself or any other party in negotiations or other dealings with the Board on any matter, including proposals, projects, employment opportunities, and other related Board matters.
6. The Board of Directors must approve the employment by BPS of any individual who has been actively involved in the governance of the Board within the preceding two (2) years.
7. No member of BPS' governance and organization structure or one of its subject-matter-expert groups shall at any time disclose to others or use for that individual's benefit or the benefit of others any confidential or proprietary information owned, possessed or used by the Board, except as authorized by the Board and for its benefit.

8. Individuals who are exposed to examination content in any format, which includes but is not limited to individuals who serve Specialty Councils and Standard Setting studies, may not teach review/recertification courses or develop review/recertification materials while actively serving on the Specialty Council and for a period of two (2) years after the end of their involvement. Individuals who are exposed to examination content in any format, which includes but is not limited to individuals who serve Specialty Councils and Standard Setting studies, are prohibited from taking the examination while actively serving and for a period of two (2) years after the end of their involvement with BPS in that capacity.

Orientation of the Board of Directors and Specialty Council Members

1. During the formal orientation of every new member of the Board and of the Specialty Councils, at or prior to their first meeting, BPS General Counsel and/or senior staff review the policy and its importance and respond to questions.
2. At the beginning of the term of service or reappointment for the Board or Specialty Council, all members are provided a copy of the procedure and the non-disclosure attestation (NDA) form outlining the need for complete security and confidentiality when handling all BPS intellectual property, the conflict of interest (COI) form, the commitment to serve (CTS) form, and the anti-trust policy (ATP) form ensuring compliance with all Federal and State Antitrust laws, rules and regulations.
3. All completed attestation forms are submitted to the BPS General Counsel and the Senior Director, Quality Assurance. ***See TEMPLATE- BPS SME Attestation Form- 1. Non-Disclosure Agreement, TEMPLATE, _ BPS SME Attestation Form 2-Conflict of Interest Policy, and TEMPLATE, _ BPS SME Attestation Form 3-Anti-Trust Policy, TEMPLATE, _ BPS SME Attestation Form 4-Commitment to Serve,*** which can all be found **HERE.**
4. At the beginning of each business meeting of the Board and Specialty Council, during the agenda review, the Chair will call for discussion of any apparent or perceived conflicts of interest on the part of any of the attendees. Identified material conflicts will be addressed and resolved prior to discussion of pertinent item(s).
5. It is at the sole discretion of the Chair of the Board of Directors or the Chair of any Specialty Council, that any individual with an actual or potential conflict of interest may, in addition to being excluded from voting on the matter in question, also be excluded from any participation in the matter and/or may be excluded from the meeting during consideration and voting upon the matter in question.

Violation of the Policy

1. Certificants who violate BPS Conflict of Interest and Confidentiality policies will be subject to provisions of ***Policy 11.3a, Withdrawal of Certification***, in the BPS Policies and Procedures Manual**.**