

## ***AHVAP Policy: Investigation of Alleged Code of Conduct Violations***

***Approved by: AHVAP Board of Directors***

***Effective Date: April 15, 2024***

***Version: 1.0***

***Applies to: All AHVAP Members, Fellows, Industry Partners, and Certified Professionals***

### ***1. Purpose***

This policy establishes a consistent and confidential process for the receipt, review, and resolution of complaints alleging violations of the AHVAP Code of Conduct for Healthcare Value Analysis Professionals and Leaders.

Its purpose is to:

- Protect the integrity, professionalism, and ethical reputation of AHVAP and its members;
- Ensure all complaints are addressed promptly, fairly, and confidentially;
- Safeguard the rights of both the complainant and the respondent through due process.

### ***2. Guiding Principles***

All investigations will be conducted with strict adherence to the following principles:

- **Confidentiality:** Information disclosed during any investigation shall be kept strictly confidential and shared only on a need-to-know basis.
- **Fairness and Objectivity:** All parties will be treated with respect and given the opportunity to present relevant information.
- **Non-Retaliation:** AHVAP prohibits retaliation against any individual who, in good faith, reports a suspected violation.
- **Transparency of Process:** AHVAP maintains clear procedures and timelines for handling all complaints.
- **Integrity:** The process will be conducted in alignment with AHVAP's commitment to honesty, respect, and professionalism.

### ***3. Definitions***

- **Complainant:** Any individual or organization submitting a report of an alleged Code of Conduct violation.
- **Respondent:** The member, fellow, or partner alleged to have violated the Code.
- **Investigation Committee:** A temporary committee convened to review allegations, composed of the AHVAP Executive Director, AHVAP President, and one Board member not directly involved in the matter.
- **Confidential Information:** Any identifying details, correspondence, or documents related to the complaint.

### ***4. Reporting Alleged Violations***

- Complaints must be submitted in writing to the AHVAP Executive Director (info@ahvap.org).
- The complaint should include:
  - The name of the individual(s) involved;
  - A detailed description of the alleged violation, including dates, facts, and supporting documentation if available;
  - The complainant's name and contact information (anonymous complaints will not be reviewed by AHVAP).

Upon receipt, the Executive Director will acknowledge the complaint in writing within five (5) business days.

### ***5. Initial Review***

- The Executive Director and President of the AHVAP Board of Directors will jointly conduct a preliminary review to determine if the complaint:
  - Falls within the scope of the AHVAP Code of Conduct;
  - Contains sufficient information to warrant further review.

If the complaint meets the criteria, it will proceed to a formal investigation. If not, the complainant will be notified that no further action will be taken.

## 6. Formal Investigation Process

### 1. Notification:

The respondent will receive a written notice via email and/or via mail summarizing the alleged violation and the investigation process. The notice will include a request for a confidential meeting with the Executive Director and President, at which the respondent may present their perspective and any relevant information.

### 2. Investigation Committee Formation:

The Executive Director and President will appoint a third impartial Board member to serve on the Investigation Committee.

### 3. Information Gathering:

The Committee may review documents, communications, witness statements, and other relevant evidence. Both the complainant and respondent may be asked to provide additional clarification or supporting information.

### 4. Confidentiality Assurance:

All parties will be reminded that the investigation is strictly confidential. Information may not be disclosed to others except as required for the investigation's fair resolution.

### 5. Deliberation and Findings:

After reviewing all available information, the Committee will determine:

- Whether a violation occurred;
- The severity of the violation;
- Appropriate recommendations for resolution or corrective action.

## 7. Possible Outcomes

The Investigation Committee may recommend one or more of the following actions:

- **No Violation Found:** The complaint is closed with no further action.
- **Informal Resolution:** Educational guidance, mentoring, or written advisement.
- **Formal Warning:** Written notice describing the violation and expected corrective behavior.
- **Suspension or Revocation:** Temporary or permanent removal of membership, fellowship, or certification privileges.
- **Referral:** In cases of severe misconduct or legal implications, the matter may be referred to external authorities.

All findings and decisions will be documented and approved by the AHVAP Board of Directors before implementation.

## 8. Confidentiality Requirements

- The identity of the complainant, the specific submitted complaint, and respondent will be kept confidential throughout the investigation to the maximum extent possible.
- Members of the Investigation Committee and the AHVAP Board must sign a Confidentiality and Non-Disclosure Agreement (NDA) prior to participating in the process.
- Investigation files will be securely stored by the Executive Director for a minimum of five (5) years and accessible only to authorized individuals.

## 9. Appeals

The respondent may submit a written appeal within 30 days of receiving the final decision. Appeals will be reviewed by the AHVAP Board of Directors, excluding any members who participated in the original investigation.

The Board's decision on appeal shall be final and binding.

## 10. Policy Review and Revision

This policy will be reviewed every three (3) years or sooner if required by changes to AHVAP governance, accreditation requirements, or applicable law. Revisions must be approved by the AHVAP Board of Directors.

## Summary Statement

**By adopting this policy, AHVAP reinforces its unwavering commitment to professionalism, ethical conduct, and fairness. All investigations will be conducted with respect, discretion, and integrity, ensuring that every member is held to the same high standard of behavior that defines the Association's leadership within the healthcare value analysis community.**