



AACVPR Professional Certification Commission Conflict of Interest, Security, Retention of Records and Access to Information Policy

Policy Statement:

It is the policy of the PCC to ensure that exams developed adhere to appropriate, standardized, and secure procedures and are free of conflict of interest. It is also the policy of the PCC to retain secure exam data, assessment results, score reports and other pertinent exam information and PCC documents in accordance with prescribed timelines. Access to such information/records will be made available to appropriate parties and personnel on an as-needed basis at the discretion of the PCC. Finally, it is the policy of the PCC that all conflict of interest, exam administration and security policies and procedures are to be reviewed annually with staff and with service providers to ensure compliance.

Purpose:

The purpose of this policy is to assure the proper conflict of interest standards, security, maintenance of and access to historical references and records to ensure the certification program is operating in accordance with industry standards.

Conflict of Interest:

AACVPR members functioning as representatives of the PCC and all committees involved in exam review and development should be knowledgeable of and avoid any actual, potential or perceived conflict of interest.

Such conflict may include, but not be limited to:

1. Any impropriety or perceived impropriety between the official activities of the PCC and any paid or unpaid activities on behalf of another organization.
2. Any member who is an owner, employee, consultant, stock or bond holder, lecturer, officer or director for any Cardiac Rehabilitation Vendor, distributor, or licensee of products or services associated with Cardiac Rehabilitation or patient care.

Involvement in the above ventures does not necessarily preclude any member from greater involvement in AACVPR but requires an increased awareness of potential or perceived conflicts and disclosure of conflicts to assure that all activities of the PCC are conducted equitably. Any conflicts that may exist must be disclosed and reviewed to determine the proper course of action to mitigate or eliminate the conflict.

Additionally, all PCC members, members of exam development committees to include item review, item writing, standard setting, and any other ad-hoc exam development committees/task

forces as needed, and PCC staff are prohibited from participating in the development, administration, sponsorship, endorsement, or teaching of any type of exam review, preparatory course or published materials related to the content of the CCRP, or sitting for the CCRP Exam, during their term of service and for a period of no less than three years after their service is complete.

As part of their service, volunteers and staff are required to complete a COI form based on this language on an annual basis. If a conflict is identified, the individual will agree to abide by the policy by abstaining from voting or participating, resigning their position, or cancelling the activity that is causing a conflict.

The testing vendor also requires that all proctors and staff involved in the administration of the exam sign an Employee Agreement with Conflict of Interest requirement and a Confidentiality Agreement as part of their involvement in the test administration process.

Security:

All records will be maintained by the appropriate party (AACVPR Headquarters/PCC staff, testing company, etc.) in secured locations, such as locked file cabinets, electronic passwords, read/write controls.

The PCC delegates to the testing vendor the responsibility to ensure that exam information, including exam items and exam forms are securely maintained. Testing vendor will also be required to provide annual documentation to PCC confirming review of security policies and procedures.

The PCC delegates to the testing delivery vendor the responsibility to ensure that the exams are administered securely and that standardized procedures are used across the testing sites to ensure consistency, with PCC oversight. These standardized procedures are to include standardization of exam proctor selection and training, guidelines on exam administration sites that offer similar conditions such as adequate lighting, comfortable seating, and an environment free from noise and other distractions and information on securely receiving and returning exam material to and from the testing vendor.

Exam development activities must occur in a secure environment whether conducted electronically or face- to-face. When exam development activities occur electronically, a secure network is utilized with password protected access to only those PCC members and approved Subject Matter Experts involved in the specific exam development activity.

The testing vendor, the PCC, and PCC staff work diligently to secure exam forms and the item bank. All subject matter experts involved in the exam development process are also required to complete a COI, Confidentiality, and Non-Disclosure agreement prior to working on any aspect of the exam. Exam forms, assessment results, score reports and analyses are provided by the testing vendor using password protection or other forms of secure encryption and are retained securely by the PCC staff at the AACVPR Headquarters. Members of the PCC or any subcommittees will not retain exam forms, secure exam development information, assessment results or score reports either physically nor electronically. After the completion of the required actions needed for the exam development process, access to the materials will be terminated by certification staff and testing vendor staff.

Assessment results for candidates that did not pass the exam, score reports and any personal information about an exam candidate will not be provided to any third party without the written

consent of the exam candidate. Only PCC Headquarter staff may release assessment results, score reports and any personal information after a candidate has provided written consent. Members of the PCC will not release this type of information and should instead contact PCC staff for assistance with requests of this nature.

Errors & Omissions:

The PCC assumes responsibility to ensure errors & omissions with the exam and the exam administration process are documented and corrected. In the event that an error or omission is discovered by the testing vendor, a test proctor, PCC staff, or an examinee as part of an exam form, or an irregularity in testing administration is identified, the PCC and PCC staff must be notified as soon as possible. After notification occurs and corrective action is taken to prevent the issue from impacting other examinees, a thorough review must be conducted by the PCC, the PCC staff, and the testing vendor on the cause of the error and a report must be produced by the involved parties to document the error, the impact of the error, how the error was corrected, and what can be done to prevent similar errors in the future. The PCC ultimately assumes responsibility for the oversight of any investigations into errors & omissions and will sign off on the final incident report. The PCC also assumes responsibility for ensuring the testing vendor, staff, and the PCC implement changes recommended in the report. Upon implementation of corrective actions, the PCC will require written documentation confirming the corrective action has been completed.

Retention of Records:

The PCC's exam vendor partner will be required to maintain historical data/reports and copies of each examination, exam items, exam development tools, etc. Further, they will be required to retain data regarding candidates' exam results, etc. for a minimum of ten (10) years.

The AACVPR Headquarters will maintain records of a certificant's status for the duration of current certification and certain critical information will be maintained permanently. Such critical information will include, but not be limited to, certificant's name, addresses, certification number, certification status, and certification start and end dates.

The AACVPR Headquarters may discard certain, non-critical, information regarding previous certificants after inactivity for a reasonable time period of not less than ten (10) years.

The AACVPR Headquarters will permanently maintain copies of all PCC governing documents, minutes of all official meetings, exam development reports documentation of all actions taken regarding applicants/candidates/certificants, pertinent correspondence, etc.

AACVPR personnel that serve as PCC staff members will be trained on the access/retention of records. Senior PCC staff members will oversee such access.

Such records are the property of the PCC. This policy is made available to applicants/candidates/certificants via the AACVPR website.

Destruction of Records:

Hardcopies of documents will be destroyed by shredding or pulverizing after they have been retained until the end of the Document Retention Schedule. Copies of computer backups will be destroyed by deletion, overwriting, physical destruction or other proven means to destroy such media after they have been retained until the end of the Document Retention Schedule.

Access to Information:

Applicants, candidates and certificants will have a reasonable opportunity to inspect the records maintained on their behalf, upon the applicant/candidate/certificant's request. These documents will include, but are not limited to: applications, exam results (and exam score reports for candidates that have failed the exam), and correspondence with applicants/candidates/certificants. Requests for such access should be addressed to AACVPR Headquarters, who shall notify the PCC when appropriate.

Procedure Review:

It is the policy of the PCC that all exam administration and security policies and procedures are to be reviewed annually by PCC staff and service providers to ensure compliance. This annual review should take place at the same time as the Technical Report Review each year and will be documented as part of the Technical Report Review minutes. Additionally, per the Errors & Omissions section of this policy, any irregularities must be reported to the PCC as soon as possible, and a review of the irregularity must be completed promptly to ensure it is not repeated.