Title: Nondiscriminatory Credentialing and Re-credentialing, and Conflict of Interest Statement

Policy Number: CO 1.10

Regulation Reference: NCQA CR 1 Nondiscriminatory Credentialing and Recredentialing

Effective: 1/28/2016
Revised Date: 2-28-18, 5-24-18, 9-27-18
Annual Review Date: 2-28-2018

Policy Statement:

Texas Tech University Health Sciences Center El Paso (TTUHSCEP) is an Equal Employment Opportunity (EEO) employer and ensures compliance with federal and state employment laws and regulations. In the event an individual believes his/her rights under these or other laws have been violated, this policy sets forth the procedures to address these concerns in a fair, equitable, and prompt manner.

Procedure:

The University is committed to providing and strengthening an educational, working, and living environment where students, faculty, staff, and visitors are free from any form of unlawful discrimination. TTUHSCEP is dedicated to fostering and supporting a culture of mutual respect and communication.

This policy applies to all University students and employees, visitors, applicants for admission to or employment with TTUHSCEP, as well as TTUHSCEP affiliates and others conducting business on campus.

TTUHSCEP does not tolerate discrimination or harassment based on or related to sex, race, national origin, religion, age, disability, protected veteran status, genetic information, those serving high-risk populations/specializing in treatment of costly conditions, or other protected categories, classes, or characteristics. While sexual orientation and gender identity are not explicitly protected categories under state or federal law, it is TTUHSCEP's policy not to discriminate in employment, admission, or use of programs, activities, facilities, or services on these bases.

Monitoring and preventing discriminatory credentialing decisions:

The Credentialing Office will maintain a heterogeneous Credentials Committee membership and the requirement for those responsible for credentialing decisions to sign a statement affirming that they do not discriminate when they make decisions.

The Director of the Credentialing Office or designee will conduct periodic audits of the credentialing files (ie. in-process files, denied files and approved files) to ensure that practitioners are not discriminated against. These reviews will be documented in a report summary format by reason for the credentialing or re-credentialing denials, terminations, and off-cycle terminations. Annually, the Director or designee will evaluate practitioners in the report, if any, who have been denied credentialing or re-credentialing to determine if there are any negative trends in respect to race, ethnicity, gender, age or sexual orientation.
Should discriminatory practices be identified through annual review or through other means, the department will take appropriate action(s) to track and eliminate those practices.

**Conflict of Interest Statement:**

Based on the Texas Tech UHSCEP Conflict of Interest and Commitment Policy HSCEP OP 10.05, under Article IV, C, All Faculty and staff that has a potential conflict of interest, shall provide a written disclosure upon initial employment and annually thereafter.

<table>
<thead>
<tr>
<th>Policy Number:</th>
<th>CO 1.10</th>
<th>Original Approval Date: 1/28/2016</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Revised Date: 2-28-18, 5-24-18, 9-27-18</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Annual Review Date: 2-28-2018</td>
</tr>
<tr>
<td>Version Number:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Signatory approval on file by:</td>
<td>Approved:</td>
<td>Juan B. Figueroa, M.D., Chair, TTUHSC EP PLFSOM Credentials Committee and Director of Clinical Operations</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9.27-18</td>
</tr>
</tbody>
</table>