



NASPOG Board Executive Committee - Conflict of Interest Policy and Disclosures

What defines a relevant relationship that requires disclosure?

NASPOG Board Executive Committee members will report relationships with commercial entities that could be perceived to influence, or that give appearance of potentially influencing the programs, products or services provided by NASPOG. A financial relationship includes any exchange of items of value (i.e. meals, travel support, lodging expenses, or donated materials from commercial and non-commercial entities). Disclosure should include ANY entity that could be considered broadly relevant to the work of NASPOG. All sources of revenue paid (or promised to be paid directly to the physician/ clinician or their Institution on the physician's/clinician's behalf over the prior 12 months (regardless of amount) should be disclosed.

Examples of items that need to be disclosed include:

- A joint industry-society research award or industry-sponsored competitive award, in which the company does not have primary or sole input in choosing the awardee.
- An "unrestricted educational grant" or investigator-initiated industry-funded research given to an individual (including CME activities) in a non-competitive fashion is considered a financial conflict.
- If a spouse or domestic partner has a significant financial relationship with a commercial interest to your field of discipline.
- Participation in legal consulting (for either defense or plaintiff) in class action or product liability cases.
- A consultant for an educational for-profit educational company (i.e. Up-To- Date®)
- Grants or consulting role outside of NASPOG (public funding i.e., NIDDK, NICHD, NIA supported grant; consulting role with FDA, AHRQ).
- Payments including honoraria (e.g., serving on a scientific advisory board, providing continuing professional education lectures or serving as an expert witness in class action or product liability cases).
- Equity holdings (including stock options and grants) in a company that, to your knowledge, conducts or plans to conduct business related to your field of discipline.

When will disclosure occur?

NASPOG Board Executive Committee Members will be required to complete a Conflict of Interest Disclosure form annually. The Board Executive Committee will be asked to update their disclosures two weeks prior to each Board meeting to ensure accurate disclosures are provided for each Board meeting.

Who will be responsible for organizing gathering of disclosures?

The conflict of interest disclosures will be recorded in individuals' online membership profiles, which will be monitored by the NASPOG staff for completion. Each individual is responsible for maintaining current disclosures on an ongoing basis. NASPOG staff will send reminder emails to NASPOG Board Executive Committee Members two weeks before each Board meeting prompting members to update their disclosures. This update includes new disclosures that occur or disclosures that disappear.

Failure to Disclose:

Failure to disclose is viewed as a breach of trust and will be investigated and managed as deemed appropriate by the NASPOG President and President-Elect.

Purpose and Application:

Complex relationships with for-profit and non-profit organizations and entities may, by their existence, present a perceived or real conflict with the missions and values of NASPOG. In as much as the existence of real or perceived conflicts of interest serves to undermine the stature, integrity, creditability and function of NASPOG, NASPOG must insure that its membership, leadership and the public-at-large understand the importance it places on identification and resolution of conflicts. The independence and the credibility of NASPOG require implementation of a clear policy that promotes professionalism and can be enacted in a practical, fair and transparent manner. The NASPOG policy has been adapted from the Council of Medical Specialty Societies Code for Interactions with Companies.

Conflict of interest, sometimes called duality of interest, is defined as any circumstances that create a risk that professional judgments or actions regarding a primary interest will be unduly influenced by a secondary interest. Primary interests are those associated with the stated mission of NASPOG. Secondary interests may be financial or non-financial in nature (i.e. intellectual conflicts of interest, membership in other organizations, or institutional or corporate associations).

Further, the degree of permitted associations will be regulated in a fashion that is commensurate with the influence that the individual has in the creation, implementation or execution of NASPOG functions. The definition of conflict, review and management of disclosures and the adjudication and resolution of conflicts needs to be a multi-layer and ongoing effort. The policy outlined will require diligent interpretation in complex cases, with the goal of providing clarity for members as they engage in their functions. The overriding goal is to provide objective conflict management. The application of this Code is not intended to be punitive to the member nor restrict members in their roles as physicians/clinicians, researchers or medical professionals. The process is by its nature fluid and ongoing reporting and review is necessary and expected.

Conflict of Interest Overview

Position	Conflict Free	Disclosure
President	X	X
President-Elect	X	X
Immediate Past President	X	X
Secretary-Treasurer	X	X
Members at Large		X

Definitions: The following terms are defined for the purpose of this Code:

Advertising: Advertising is a Business Transaction in which a Company pays a fee to a Society in exchange for the Society's publication of a promotional announcement that highlights the Company or the Company's products or services. For purposes of this Code, Advertiser refers to a Company that purchases Advertising.

Business Transaction: An interaction between NASPOG and a Company in which a Company pays a fee in exchange for a service or product.

Charitable Contribution: A gift, including an in-kind gift, given by a Company to NASPOG or its Foundation for use in furthering the organization's charitable purposes and in accordance with applicable tax rules and legal standards.

Continuing Medical Education (CME): Continuing Medical Education (CME) consists of educational activities for which the attendee may receive CME credit based on accreditation awarded to the provider by a recognized accrediting body (ACCME). CME activities "serve to maintain, develop, or increase the knowledge, skills and professional performance and relationships that a physician uses to provide services for patients, the public or the profession." For purposes of this code, educational activities for physicians that are not CME-accredited are considered non-CME educational/informational programs.

Company: A for-profit entity that develops, produces, markets or distributes drugs, devices, services or therapies used to diagnose, treat, monitor, manage and alleviate health conditions and whose interests could reasonably be seen to overlap with the interests and mission of NASPOG. This definition is not intended to include entities outside of the health care sector, or entities through which physicians/clinicians provide clinical services directly to patients.

Direct Financial Relationship: A compensated relationship with a company held by an individual that should generate an IRS Form W-2, 1099 or equivalent income report.

Educational Grant: A sum awarded by a company, typically through its grants office, for the specific purpose of supporting an educational or scientific activity offered by the recipient. Educational grants awarded by a company to support a CME activity are referred to in the ACCME Standards for Commercial Support as "Commercial Support" of CME. An educational grant may also be "in-kind."

Gifts "in-kind": Compensation in goods and services rather than money; non-monetary gifts of valued consideration (e.g. access to advisory or consultant services, specific resource allocation or access).

Key Society Leaders: For purposes of this Code, the Key Society Leaders are officers in the Presidential line of succession (e.g. President-elect, President, and the Immediate Past President), and the Secretary-Treasurer.

Research Grant: For purposes of this Code, a Research Grant is an award that is given by a Company or other funding agency to an individual, institution, or practice to fund the conduct of scientific research. Companies may provide an individual, institution, or practice with programmatic support (e.g., an Educational Grant) designated for the specific purpose of funding Research Grants.

NASPOG and its Relationship to Other Entities

1. Independence - NASPOG will develop all educational activities, scientific programs, products, services and advocacy positions aligned with the mission of the Society, independent of external influence, and will develop and adopt policies and procedures that foster this independence. NASPOG will separate their efforts to seek Educational Grants, Corporate Sponsorships, Charitable Contributions and support for Research Grants from their programmatic decisions. The initial step in program development is the independent assessment by NASPOG that a program is needed (e.g. to address gaps in care or knowledge). Once NASPOG determines that a program is needed, it is permissible to assess the availability of funds.
 - a. Key Society Leaders will be responsible for evaluating and adjudicating conflicts of interest and guiding the interactions of NASPOG, and its Members, and monitoring compliance with this Code by the covered individuals.
 - b. Key Society Leaders may not have Direct Financial Relationships with Companies during his/her term of service. Financial Relationships from entities whose sole purpose is medical education (e.g. book and journal publishers, UptoDate, ACGME approved CME, etc.) is allowed but must be disclosed and if the relationship could reasonably be seen to overlap with the interests, missions, and values of NASPOG may require management.
 - c. NASPOG Board Executive Committee Members at Large are permitted to have Direct Financial Relationships with Companies, unless otherwise noted, but must disclose any such Relationship and indicate whether it is in excess of \$5,000 per year when requested.
 - d. Nominees for Key Leadership positions will be notified that they will be required to terminate any Direct Financial Relationship with Companies prior to the start of their term.
 - e. Key Society Leaders may provide uncompensated service to Companies and accept reasonable travel reimbursement in connection with those services. Research support is acceptable as long as the money is paid to the institution or practice where the research is conducted, not to the individual. Direct financial compensation for CME by Companies is not permitted, however support for CME activities from hospitals or health care systems (both for-profit and non-for profit), medical education companies, and non-for-profit entities such as medical societies is allowed. Research support, uncompensated services or other permitted relationships must be disclosed to NASPOG, regardless of monetary value or its equivalent.
 - f. Key Society Leaders cannot serve as officers or members of the governing board of related professional national and international associations during their term of office. Related professional societies include national and international professional societies whose principal interests include
 - g. Key Society Leaders who are elected or appointed prior to the time NASPOG approves this Code have until December 31, 2019 to end their relationships/conflicts related to service on other governing boards and Direct Financial Relationships with Companies. These relationships should be disclosed in accordance with Principle 2a and b.
 - h. NASPOG will use written agreements with Companies for Educational Grants, Corporate Sponsorships, Charitable Contributions, Business Transactions and support of Research Grants. Written agreements should specify what the funds are for, the amount given, and the roles of the Company and Covered Individual. These agreements may be reviewed by the COO or other designated body.

2. Transparency - NASPOG will make their conflict of interest policies available to their members and the public. NASPOG will manage conflicts of interest in a variety of ways. This may include disclosure alone, or other conflict of interest management mechanisms such as recusal, divestiture or NASPOG-independent review. The President and President-Elect will select conflict of interest management mechanisms that are appropriate for the activity, the type of relationship and role of the individual under consideration.
 - a. NASPOG will provide written disclosure forms individuals who serve on behalf of NASPOG and will use the disclosed information to manage conflicts of interest in decision- making. NASPOG will require volunteers to update disclosure information at least annually and when material changes occur.
 - b. NASPOG will disclose all Direct Financial Relationships and uncompensated relationships held by the Key Society Leaders and Board Members at Large, making this information available to their members and the public.
3. NASPOG and its Relationships with Industry - To support its mission-related activities, the Society solicits restricted and unrestricted contributions from organizations, corporations and foundations. The Society enters into corporate relationships to:
 - a. Increase the dissemination of scientific, medical and health information and education.
 - b. Help develop, produce and implement Society mission-related programs, materials and activities.
 - c. Provide a new means of raising funds and increasing public awareness for the Society's mission-related activities.

In accepting donations from corporations with vested interests in how the public regards their products, the Society is determined to avoid conflict of interest, or even its appearance. Therefore, the Society enters into corporate relationships thoughtfully, with careful consideration given to the possible unintended effects, especially regarding the organization's public trust.

NASPOG will decline charitable contributions where the donor expects to influence Society programs or advocacy positions, or where donor restrictions would influence Society programs or positions in a manner that is not aligned with the Society's mission. Reasonable restrictions on the purposes for which Charitable Contributions will be used are acceptable, as are reasonable requirements for reporting on the uses of the donated funds. NASPOG will disclose Company Support (Educational Grants, Corporate Sponsorships, Charitable contributions and support of research grants) making this information available to their members and the public.

4. Corporate Support
 - a. Advertising: Advertising may include promotional messages included on meeting banners and signage, disposable products (e.g. hotel key cards, water bottles), advertisements in printed materials, and advertisements in electronic publications. Advertising in all Society publications should be easily distinguishable from editorial content. Advertising should not be designed to look like scientific articles. Placement of advertising adjacent to articles or editorial content discussing the Company or product that is the subject of the ad is prohibited. All advertisements are subject to review by the COO and overseen by the Society. Advertisements placed in publications that pertain to CME must comply with ACCME requirements, which state that advertisements must remain separate from educational content.
 - b. NASPOG will not place the names or logos of Companies or products on Society-distributed, non-educational "reminder" items (e.g. tote bags, lanyards, highlighters, notebooks and luggage tags) that

Companies are not permitted to give directly to healthcare professionals under generally accepted standards for ethical interactions (i.e. PhRMA Code, AdvaMed Code).

- c. Sponsorship: NASPOG will only accept sponsorship of items or programs that are aligned with the Society's strategic plan and mission.
 - d. Table Top Exhibits: A code of exhibitor conduct will be developed and shared with all companies participating in any Society meeting. The purpose of this code is to ensure that the tone of the exhibiting area is professional in nature and follows existing PhRMA, AdvaMed and ACCME guidelines. Members of the Board Executive Committee may not participate as leaders or presenters in a Company promotional/marketing event.
5. Education - In accordance with ACCME policy educational content shall promote health care, and not a specific proprietary business interest. The content shall offer a balanced view and should use generic names in place of product trade names whenever possible. Live case demonstrations shall not be used to promote a product and shall provide a proper clinical perspective. This policy applies to the organization as a whole, and to all educational activities, including satellite symposia not sponsored or endorsed by the Society.
- a. The educational content of all programs will not be directed or influenced by the provision of financial support.
 - b. Individuals affected by this policy include course directors, planners, reviewers, moderators, speakers, faculty; and individuals who influence the content of other educational products, services and publications.
 - c. NASPOG will not solicit supporters' suggestions about program topics, speakers or content.
 - d. NASPOG staff will retain control over the submission of educational grants and implement safeguards to ensure educational programs are non-promotional and free from commercial influence and bias.
 - e. Presenters will not be allowed to use company-controlled presentation materials and from using slides with company logos.
 - f. Satellite CME Symposia: These programs are planned by a third-party provider and must comply with ACCME standards and be clearly distinguished as separate from the Society's CME programs in all promotional materials and on-site. Key Society Leaders and the Board Members at Large are not permitted to participate as faculty, presenter, chair or consultant or in any role other than attendee.
 - g. Industry Supported Education: These non-CME programs are planned independent from any Society educational efforts and must be clearly distinguished as separate from the Society's CME programs in all promotional materials and on-site. Key Society Leaders and Board Members at Large are not permitted to participate as faculty, presenter, chair or consultant or in any role other than attendee.
6. Charitable Contributions – NASPOG is the benefactor of charitable contributions. It is acceptable for NASPOG to accept contributions that are designated to support a specific program allowing for reasonable restrictions.
- a. All contributions will be used in a manner that is aligned with the Society's strategic plan and mission.
 - b. No contributions will be accepted where the donor expects to influence programs or positions, or where donor restrictions would influence programs or positions.
 - c. All donors will be recognized in a consistent and appropriate manner. Donor recognition typically includes: Web site listing, signage, walk-in slides, from a podium and in printed materials.
7. Research Grants and Endowed Lectures - Through contributions from individual donors, Companies and foundations the Society is able to award annual research grants and select Endowed Lecturers.
- a. Companies are not permitted to select (or influence the selection of) recipients of Research Grants or Lectures. Companies have no control or influence over manuscripts that arise from grant-funded research.
 - b. NASPOG will appoint an independent review committee to select lecturers or the recipients of

research grants, based on a peer review process.

- c. NASPOG will not name a research grant or endowment after a corporate entity. Instead recognition will be provided to all corporate/foundation donors to the grant or lecture programs.
 - d. NASPOG will not permit Companies that support Research Grants to receive intellectual property rights or royalties arising out of the grant-funded research
8. Adherence to the Code - Adherence to this Code will be promulgated by NASPOG. All Members of NASPOG will be encouraged to adopt the principles of this Code and their application.