Introduction

The American College of Chest Physicians (CHEST), is committed to advancing best patient outcomes through innovative chest medicine education, clinical research, and team-based care. We are a member organization whose members are empowered to make themselves heard and to make a difference in chest medicine. CHEST leadership works diligently to ensure that CHEST addresses issues of concern for members, patients, and communities.

CHEST has a clear and explicit policy on conflict of interest for members holding a leadership position within the organization. Leaders regularly complete a disclosure form for review, supporting our value of transparency. As with bylaws, each time a change (amendment) is made to the policy, it must be formally approved and adopted by the Board of Regents. In addition, all leaders must request a priori review of new relationships.

To limit the potential for bias, CHEST enforces a strict leadership conflict of interest review and management process. While CHEST strives to appoint leaders, who are free from financial and/or intellectual conflict, the inclusion of recognized clinical experts who have relationships deemed to be manageable ensures the appropriate involvement of the leading scientists and clinicians in the field.

Accordingly, the Professional Standards Committee (PSC) will establish and maintain an Operations Document describing how disclosures are evaluated for COI and how resulting actions are determined and implemented.

All CHEST leaders and other individuals listed in this policy are subject to and must abide by this policy at all times in order to remain in their leadership position(s). Failure to abide by this policy may result in action by the Board of Regents or Board of Trustees, up to and including removal from the corresponding Board(s).
Structure
CHEST leaders are defined by five leadership levels: I, IIA, IIB, IIC, III. Each level is listed below, moving from most to least restrictive (left to right) with positions linked to those levels populating the corresponding columns.

Members of the *CHEST* Editorial Boards, Health Policy and Advocacy Work Groups, and CHEST Foundation Work Groups must submit a disclosure under this policy as well but are not subject to the leadership levels defined below.

<table>
<thead>
<tr>
<th>Level I</th>
<th>Level II</th>
<th>Level III</th>
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<tbody>
<tr>
<td></td>
<td>A</td>
<td>B</td>
</tr>
<tr>
<td>President</td>
<td>President, CHEST Foundation</td>
<td>Chair and VC, Guidelines Oversight Committee</td>
</tr>
<tr>
<td>Immediate Past President</td>
<td>President-Designate</td>
<td>Chair and VC, Education Committee</td>
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<tr>
<td>President-Elect</td>
<td>Regents-at-Large</td>
<td>Chair and VC, Scientific Program Committee</td>
</tr>
<tr>
<td>Secretary (CHEST’s EVP and CEO)</td>
<td>Chair and VC, Council of Networks</td>
<td>Immediate Past President, CHEST Foundation</td>
</tr>
<tr>
<td>Editor in Chief, <em>CHEST</em> journals</td>
<td>Chair, Executive Committee Council of Global Governors</td>
<td>President-Elect CHEST Foundation</td>
</tr>
<tr>
<td>Chair, Finance Committee</td>
<td>Joint CHEST/ATS Clinical Practice Committee</td>
<td>Professional Standards Committee</td>
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<td>Governance Committee¹</td>
<td>Governance Committee¹</td>
<td>Governance Committee¹</td>
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<td>-</td>
<td>Health Policy and Advocacy Committee</td>
<td>Clinical Simulation Oversight Director</td>
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¹ The Governance Committee is slated from representatives among the Board of Regents and the Board of Trustees; thus, members will continue to adhere to the level assigned for their Board position of origin.
**COI Rules by Leadership Level**

CHEST leaders are defined by five leadership levels: I, IIA, IIB, IIC, III. Each level is defined below, moving from most to least restrictive.

**Level I.** Level I leaders are bound by the following COI rules during their term as Level I leaders:

- No promotional activities (see points of clarification below “A”).
- Investigators in grant-funded research supported by nonprofit/government or commercial entity may receive funds, if directed to the institution. It is not acceptable to receive funds directed to the individual.
- Except for investments in mutual funds, no investments (e.g. holdings in stocks or stock options of pharmaceutical or device companies) or any other commercial entities that manufacture or sell products related to management of individuals with disorders addressed by CHEST. No investments in tobacco companies except for mutual funds. These restrictions apply to investments and intellectual property (e.g., patents associated with licensing, and/or financial or in-kind benefit) held by individual, their spouse, domestic or life partner, dependent children, and minors living in the same household (per IRS definition).
- Disclosure of any activities, investments, or employment of a spouse, domestic or life partner, dependent children, or minors living in the same household that may be affiliated with pharmaceutical companies or any other commercial entities (e.g., device manufacturers) that make or sell products related to management of individuals with disorders addressed by CHEST.
- No service as board member or officer of any other national or international medical or professional society (see points of clarification below “D”).
- No service as chair of a committee or chair of any major projects any other national or international medical or professional society, except for limited exceptions as authorized by the organization’s decision-making body on COI. Serving as a committee member is permissible (see points of clarification “D” below).
- Disclosure of activities as a member of any committee of any other national or international medical professional society.
- No employment full-time, or part-time, is allowed for pharmaceutical companies or medical device companies.
- No consulting, or advisory board activity for pharmaceutical companies and medical device companies, including CHEST-sponsored focus groups, except as authorized by the organization’s decision-making body on COI (see points of clarification A” below). This activity is not allowed even if it is not remunerated.
- No issuing statements on behalf of a commercial entity.
- No service as Editor in Chief of a journal (other than CHEST or CHEST Physician) in the field of critical care, pulmonary, or sleep medicine.
**Level IIA.** Level IIA leaders are bound by the following COI rules during their term as Level IIA leaders:

- No promotional activities (see points of clarification “A” below).
- Investigators in grant-funded research supported by nonprofit/government or commercial entity may receive funds, if directed to the institution. It is not acceptable to receive funds directed to the individual.
- Except for investments in mutual funds, no investments (e.g. holdings in stocks or stock options of pharmaceutical or device companies) or any other commercial entities that manufacture or sell products related to management of individuals with disorders addressed by CHEST. No investments in tobacco companies except for mutual funds. These restrictions apply to investments and intellectual property (e.g., patents associated with licensing, and/or financial or in-kind benefit) held by individual, their spouse, domestic or life partner, dependent children, and minors living in the same household (per IRS definition).
- No service as board member or officer of any other national or international medical or professional society (see points of clarification “D” below).
- No service as chair of a committee or chair of any major projects of any other national or international medical or professional society, except for limited exceptions as authorized by the organization’s decision-making body on COI. Serving as a committee member is permissible (see points of clarification “D” below).
- Disclosure of activities as a member of any committee of any other national or international medical professional society.
- No employment full-time, or part-time, is allowed for pharmaceutical companies or medical device companies.
- If holding a CHEST Foundation leadership position: No full-time/part-time employment with a nonprofit entity that includes a focus on chest disorders, which involves fundraising, advocacy, education, and creation of awareness that would directly compete with the missions of CHEST and the CHEST Foundation.
- No consulting, or advisory board activity for pharmaceutical companies and medical device companies, including CHEST-sponsored focus groups, except as authorized by the organization’s decision-making body on COI (see points of clarification “A” below). This activity is not allowed even if it’s not remunerated.
- No issuing statements on behalf of a commercial entity.
- No service as Editor in Chief of a journal (other than *CHEST* or *CHEST Physician*) in the field of critical care, pulmonary, or sleep medicine.

**Level IIB.** Level IIB leaders are bound by the following COI rules during their term as Level IIB leaders:

- No promotional activities (see points of clarification “A” below).
- Investigators in grant-funded research supported by nonprofit/government or commercial entity may receive funds, if directed to the institution. It is not acceptable to receive funds directed to the individual.
- Except for investments in mutual funds, no investments (e.g. holdings in stocks or stock options of pharmaceutical or device companies) or any other commercial entities that manufacture or sell products related to management of individuals with disorders addressed by CHEST. No investments in tobacco companies
except for mutual funds. These restrictions apply to investments and intellectual property (e.g., patents associated with licensing, and/or financial or in-kind benefit) held by individual, their spouse, domestic or life partner, dependent children, and minors living in the same household (per IRS definition).

- No service as board member or officer of any other **competing** national or international medical or professional society (see points of clarification “D” below).
- No service as chair of a committee or chair of any major projects of any other national or international medical or professional society, except for limited exceptions as authorized by the organization’s decision-making body on COI. Serving as a committee member is permissible (see points of clarification below “D”).
- No employment full-time, or part-time, is allowed for pharmaceutical companies or medical device companies.
- If holding a CHEST Foundation leadership position: No full-time/part-time employment with a nonprofit entity that includes a focus on chest disorders, which involves fundraising, advocacy, education, and creation of awareness that would directly compete with the missions of CHEST and the CHEST Foundation.
- Consulting or advisory board activity for pharmaceutical companies and medical device companies, including CHEST-sponsored focus groups, except as authorized by the organization’s decision-making body on COI (see points of clarification (C) below) is manageable.
- No issuing statements on behalf of a commercial entity.
- Disclosure of activities as a member of any committee of any other national or international medical professional society.
- No service as Editor in Chief of a journal (other than CHEST or CHEST Physician) in the field of critical care, pulmonary, or sleep medicine.

**LEVEL IIC.** Level IIC leaders are bound by the following COI rules during their term as Level IIC leaders:

- No promotional activities (see points of clarification (A) below).
- Investigators in grant-funded research supported by nonprofit/government or commercial entity may receive funds, if directed to the institution. It is not acceptable to receive funds directed to the individual.
- Except for investments in mutual funds, no investments (e.g. holdings in stocks or stock options of pharmaceutical or device companies) or any other commercial entities that manufacture or sell products related to management of individuals with disorders addressed by CHEST. No investments in tobacco companies except for mutual funds. These restrictions apply to investments and intellectual property (e.g., patents associated with licensing, and/or financial or in-kind benefit) held by individual, their spouse, domestic or life partner, dependent children, and minors living in the same household (per IRS definition).
- No service as board member or officer of any other competing national or international medical or professional society (see points of clarification (B) below).
- Service as a member or chair of a committee or chair of any major projects of any other national or international medical or professional society is permissible. However, Deputy and Associate Editors should maintain
confidentiality regarding journal information and refer questions to the Editor in Chief.

- Disclosure of activities as a member of any committee of any other national or international medical professional society.
- No employment full-time, or part-time, is allowed for pharmaceutical companies or medical device companies.
- If holding a CHEST Foundation leadership position: No full-time/part-time employment with a nonprofit entity that includes a focus on chest disorders, which involves fundraising, advocacy, education, and creation of awareness that would directly compete with the missions of CHEST and the CHEST Foundation.
- Consulting or advisory board activity for pharmaceutical companies and medical device companies, including CHEST-sponsored focus groups, except as authorized by the organization’s decision-making body on COI (see points of clarification “B” below) is manageable.
- No issuing statements on behalf of a commercial entity.
- No service as Editor in Chief of a journal (other than CHEST or CHEST Physician) in the field of critical care, pulmonary, or sleep medicine.

**Level III.** Level III leaders are bound by the following COI rules during their term as Level III leaders:

- No relationships with tobacco companies.
- No employment full-time, or part-time, is allowed for pharmaceutical companies and medical device companies.
- If holding a CHEST Foundation leadership position: No full-time/part-time employment with a nonprofit entity that includes a focus on chest disorders, which involves fundraising, advocacy, education, and creation of awareness that would directly compete with the missions of CHEST and the CHEST Foundation.
- Level III leaders may have conflicts but will have to recuse themselves from conversations related to those conflicts. These COIs are considered manageable.

**Other Matters**

A. Effective date of implementation of these COI rules: October 18, 2019.
B. Notification of the adopted policy will be sent to all members.
C. Any questions or clarifications concerning a conflict are initially addressed by respective committee or other CHEST entity. However, if no immediate resolution is forthcoming, clarification is required, or continued concerns exist, the matter will be submitted to the Professional Standards Committee for a determination.
D. A COI disclosure form for all CHEST leaders and staff is updated annually and available online.
E. Committees should start every meeting (both remotely and in-person) by asking whether anyone has any new COI to disclose, including a COI related to a matter on the meeting agenda.
F. Health Policy and Advocacy Committee Work Group members, CHEST Editorial Board members, and CHEST Foundation Work Group members, will not be assigned to a leadership level, unless they serve in another capacity within CHEST leadership. Should a HPAC Work Group Member have a direct conflict within a project/activity they must state their recusal for situational awareness.
Points of Clarification

A. Please see the in Appendix B: CHEST Conflict of Interest Terminology for definitions related to promotional activity, speaker’s bureau, etc.

In relation to commercial entities, the PSC refers to the ACCME definition of a commercial entity as an entity that produces, markets, re-sells, or distributes health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests. For full detail, refer to Appendix B: CHEST Conflict of Interest Terminology (ACCME Commercial Entity)

B. The restrictions on service for other professional medical societies intend to avoid risk or perception of conflicting loyalties that could impair CHEST and its best interests and apply to national and international entities only. They do not limit a leader’s participation in local and state medical and professional societies or in hospital management. Level IIB/IIC leaders may serve on the board for another society providing that it is not an organization with which CHEST would compete for members, annual meeting attendance, or products.

C. The restriction on work for pharmaceutical and medical device companies might limit a leader’s participation as a content expert for a company. Leaders who believe that their work for a company would not create an actual or perceived conflict of interest may seek formal authorization for an exception.

D. Within the context of the restriction on serving as a board member for a national or international medical or professional society, “board” is considered to have a fiduciary responsibility. Committees with the name “board” that do not have fiduciary responsibility would not be considered as a conflict of interest. Similarly, leadership roles within academic medical centers or non-profit entities would not be considered a conflict of interest, unless the primary job description, roles, or responsibilities includes a duty in direct conflict with the missions of CHEST and CHEST entities (eg, the Foundation). Examples of conflict would include an institutional role in planned giving and development, community outreach, and administration of CME programs. This does NOT preclude directing a specific CME course.

E. Carefully review all contracts to ensure that recordings, statements, and other content from educational activities cannot be re-purposed for commercial (including, but not limited to, marketing, promotional, or investment) purposes.

F. Leaders should refrain from participating in/or attending any activity sponsored by a commercial entity, since such activities may represent a reportable promotional or marketing activity. Level I-IIC leaders should
request permission before attending or participating in such activities. Level III leaders must disclose attendance or participation.

**Appeals**

Any questions or clarifications concerning a conflict are initially addressed by the respective committee or other CHEST entity. However, if no immediate resolution is forthcoming, clarification is required, or continued concerns exist, the matter will be submitted to the Professional Standards Committee for a determination.

If the member disagrees with the determination of the Professional Standards Committee, the member may appeal the decision to a COI Appeals Committee consisting of the Chair of the Professional Standards Committee (serves as Chair), two Regents-at-Large appointed by the President, and the Immediate Past President serving as the liaison to the Professional Standards Committee. A super majority (3/4) is required to reach a decision, which will be binding.

**Review and Categorization of COIs**

All individuals subject to this policy must disclose all COIs over the last 3 years, including relationships in pulmonary, critical care, and sleep medicine, and areas where there may be a potential conflict, with the mission of CHEST, must be explained. This also includes activities relevant to practice, industry, or commercial entities that have products related to pulmonary, critical care, and sleep medicine or overlap with the mission of CHEST.

If an individual takes on new non-CHEST related leadership appointments during the time as a CHEST leader, the COI disclosure must be updated. New external leadership appointments and relationships should be disclosed and approved by the Professional Standards Committee before the new position is accepted.

Questions regarding new leadership relationships may be sent to the Professional Standards Committee to ensure the new relationship adheres to CHEST policies.

For full detail, refer to [Appendix A: Categorization of Relationships and Activities by Role](#).
## Appendix A:
Categorization of Relationships and Activities by Role

<table>
<thead>
<tr>
<th>Type of Relationship/Activity</th>
<th>A Level I</th>
<th>B Level IIA</th>
<th>C Level IIB</th>
<th>D Level IIC</th>
<th>E Level III</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Authorship of scientific peer-reviewed publications</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>2 Authorship of nonscientific publications</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>3 Authorship of textbooks/chapters</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>4 Authorship of material in support of a commercial entity</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td>5 Investigator in grant-funded research supported by nonprofit/government or commercial entity</td>
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<td></td>
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<tr>
<td>5.1 With funds directed to institution</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>5.2 With funds directed to individual</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Situational Recusal</td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>Type of Relationship/Activity</th>
<th>A Level I</th>
<th>B Level IIA</th>
<th>C Level IIB</th>
<th>D Level IIC</th>
<th>E Level III</th>
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<tr>
<td>6 Faculty in CME-/MOC-accredited activity</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>7.1 Faculty in commercially sponsored nonaccredited activity (i.e., morning symposia)</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td>7.2 Faculty in a commercially sponsored, nonaccredited activity where a not-for-profit organization fully controls speaker selection and content (e.g. CHEST-run)</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>Type of Relationship/Activity</td>
<td>A Level I</td>
<td>B Level IIA</td>
<td>C Level IIB</td>
<td>D Level IIC</td>
<td>E Level III</td>
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<tr>
<td>13 Patent holder or applicant</td>
<td></td>
<td>Manageable</td>
<td>Manageable</td>
<td>Manageable</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td>14 Investment in mutual funds</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>15 Investments (e.g. stock holdings, stock options, warrants, shares, bonds, or any other form of direct investment; not as part of a mutual fund) in pharmaceutical companies or any other commercial entities</td>
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</table>
(e.g., device manufacturers) that manufacture or sell products related to management of individuals with disorders addressed by CHEST. See Appendix B regarding commercial entities. ^

<table>
<thead>
<tr>
<th></th>
<th>Disqualifying</th>
<th>Disqualifying</th>
<th>Disqualifying</th>
<th>Disqualifying</th>
<th>Situational Recusal</th>
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<tbody>
<tr>
<td><strong>EMPLOYMENT</strong></td>
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<tr>
<td><strong>16.1</strong></td>
<td>Full-time/part-time employment arrangement with a for profit commercial entity that manufactures or sells products related to management of individuals with disorders of the chest</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
</tr>
<tr>
<td><strong>16.2a</strong></td>
<td>Full-time/part-time employment with a nonprofit organization whose primary mission is advocacy (patient or disease focused), that directly competes with CHEST’s mission^^</td>
<td>With Participation in College Leadership Positions</td>
<td>Situational Recusal</td>
<td>Situational Recusal</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td><strong>16.2b</strong></td>
<td>Full-time/part-time employment with a nonprofit organization whose primary mission is advocacy (patient or disease focused), that directly competes with CHEST’s mission^^</td>
<td>With Participation in Foundation Leadership Positions</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
</tr>
<tr>
<td><strong>TOBACCO/E-CIGARETTE</strong></td>
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</tr>
<tr>
<td><strong>17</strong></td>
<td>Investments or engagements with tobacco-related companies and their wholly owned subsidiaries.</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
</tr>
</tbody>
</table>

^ Item 15: These restrictions apply to investments and intellectual property (e.g., patents associated with licensing, and/or financial or in-kind benefit) held by individual, their spouse, domestic or life partner, dependent children, and minors living in the same household.

^^ Item 16: See Appendix B regarding the definition of nonprofit organization employment.
<table>
<thead>
<tr>
<th>Type of Relationship/Activity</th>
<th>A Level I</th>
<th>B Level IIA</th>
<th>C Level IIIB</th>
<th>D Level IIC</th>
<th>E Level III</th>
</tr>
</thead>
<tbody>
<tr>
<td>18.1 Service as board member or officer of a competing organization with which CHEST would compete for members, annual meeting attendance, or products.</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td>18.2 Service as board member or officer for another society provided that it is not an organization with which CHEST would compete for members, annual meeting attendance, or products.</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>19.1 Service as chair of a committee or chair of any major projects of a competing organization with which CHEST would compete for members, annual meeting attendance, or products.</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Manageable</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td>19.2 Service as chair of a committee or chair of any major projects for another society provided that it is not an organization with which CHEST would compete for members, annual meeting attendance, or products.</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>20.1 Activities as a member of any</td>
<td>Manageable</td>
<td>Manageable</td>
<td>Manageable</td>
<td>Manageable</td>
<td>Situational Recusal</td>
</tr>
<tr>
<td>Committee of a competing organization with which CHEST would compete for members, annual meeting attendance, or products.</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
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</tr>
<tr>
<td>Activities as a member of any committee of another society provided that it is not an organization with which CHEST would compete for members, annual meeting attendance, or products.</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Acceptable</td>
</tr>
<tr>
<td>Service as Editor in Chief of a journal in the field of (other than CHEST or CHEST Physician) critical care, pulmonary, or sleep medicine.</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Disqualifying</td>
<td>Situational Recusal</td>
</tr>
</tbody>
</table>
Appendix B: CHEST Conflict of Interest Terminology (Developed October 2019; Updated May 2022)

Commercial Advisory Boards, Committees, or Engagements: Serving on a committee or board organized by a commercial entity on a topic related to a company project, product or promotion.

Authorship: Listed among the authors of a manuscript or other publication that is intended for distribution (first, middle or last author). Being listed in the acknowledgement section does not count as authorship. Scientific writing assistance is acceptable for all leaders, as long as the author has final control of the content in accord with ICMJE authorship requirements.

CHEST Foundation Leadership Position: An officer or trustee of the CHEST Foundation, as well the CHEST Foundation Awards Committee and Work Group members.

Commercial Educational Activity: Educational forum organized/supported by a commercial entity without conformance to standards required by the American College of Continuing Medical Education (ACCME) (i.e. non-accredited). Examples include satellite symposia, pharmaceutical or device manufacturer organized educational events, local sponsored lectures, or any talk/presentation using any industry branded, generated, or facilitated slides.

Commercial Entity: The PSC defers to the ACCME definition of a commercial entity. A commercial interest (i.e: ineligible organizations per ACCME definition) is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.

The ACCME does not consider providers of clinical service directly to patients to be commercial interests - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.

A commercial interest is not eligible for ACCME accreditation. Commercial interests cannot be accredited providers and cannot be joint providers. Within the context of this definition and limitation, the ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME in which case they would not be considered commercial entities by CHEST:

- 501-C Non-profit organizations (Note, ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint provider, but they can be a commercial supporter.)
- Government organizations
- Non-health care related companies
• Liability insurance providers
• Health insurance providers
• Group medical practices
• For-profit hospitals
• For-profit rehabilitation centers
• For-profit nursing homes
• Blood banks
• Diagnostic laboratories

Leaders should refrain from participating in/or attending any activity sponsored by a commercial entity, since such activities may represent a reportable promotional or marketing activity. Level I-IIIC leaders should request permission before attending or participating in such activities. Level III leaders must disclose attendance or participation.

**Competing Organization**: Another society or organization with which CHEST would compete (e.g. for members, annual meeting attendance, or products).

**Conflict of Interest**: Any relationship or other known set of circumstances that has the potential to bias or might reasonably be perceived by others to bias, an individual’s judgement, conduct or other actions.

- **Financial COI**: Any relationship for which one receives remuneration or in-kind benefits that could be perceived to influence one’s judgement in the evaluation of specific recommendations. These include relationships by the participant, their spouse, domestic or life partner, dependent children and minors living in the same household.
- **Intellectual COI**: Any activity that creates the potential for attachment to a specific predetermined point of view that could be perceived to affect one’s judgement in the evaluation of specific recommendations or suggestions.
- **Related content area**: Those that are aligned with the clinical questions and/or PICO elements to be addressed within the guideline or recommendation.

**Consultancy**: Time-limited business relationship with a commercial entity, where the consultant provides professional input regarding a project, product, or medical topic. To comprise a COI, the consultant must receive some remuneration for their participation which includes in-kind payments such as travel expenses.

**Expert Testimony**: Testimony made by a qualified person about a scientific, technical, clinical, or professional issue. A key distinction is whether one provides testimony in support of (or opposition to) a pharmaceutical or device company (which must be managed or is prohibited, depending on one’s leadership level/guideline position with CHEST) or for a patient which is acceptable.

**Employment**: Refers to a contractual arrangement where the employee performs a service which is paid for by the employer.
- **Nonprofit Employment**: Individuals who are employed by a nonprofit organization whose primary mission is advocacy (patient or disease
focused). This excludes healthcare delivery entities (e.g., academic institutions, health care delivery organizations).

**Faculty:** Presenter or moderator at an educational or promotional event

**Guideline Panelist:** Any person who contributes to the work of developing the guideline (e.g. defining the scope, forming the clinical questions, searching and evaluating the literature, developing recommendations or suggestions, voting, and drafting the manuscript) and includes an expectation of authorship, provided they meet the criteria defined by the International Committee of Medical Journal Editors.

**Investigator:** Investigators on a project usually receive remuneration for their role on the program/project. This typically includes Principal Investigators and Co-Investigators, but not consultants (paid or unpaid). Forms of remuneration include monetary compensation, equipment, travel, or supplies.

**Speakers Bureaus:** Being identified as a company sponsored speaker for an educational event where slides or content are at least in part supplied by the company
- If Pharma gives money to an institution or not-for-profit organization (assuming that organization is not financially linked to a pharmaceutical or device manufacturer) to host an event, it is required that the talk title, the talk content, speakers, and all funds be negotiated and managed by the institution/organization

**Tobacco Company:** A tobacco company is defined by one that is engaged in the growth, preparation for sale, shipment, advertisement, and distribution of tobacco or tobacco-related products, including one that is a wholly owned subsidiary of a tobacco company.

**Patent Holder or Applicant:** Being listed as the sole or one of several inventors of some disclosed intellectual property submitted for patent consideration.

**Promotional Activities:** Those activities that support, market, or increase sales or consumption of a specific drug, device, technology, or technique, or that are intended to enhance the image, well-being, stature or popularity of a commercial entity pertinent to chest medicine, independent of remuneration.