

The ACCP Board of Regents adopted the following ACCP Conflict-of-Interest (COI) Policy on October 29, 2010.

1) STRUCTURE.

Level I: Level I leaders are:

President
Immediate Past President
President-Elect
Treasurer
Assistant Treasurer
Secretary (ACCP's EVP & CEO)
Editor-In-Chief of CHEST

Level II: The Level II leaders are:

President-Designate
Regents-at-Large
Chair and Vice Chair of Council of NetWorks
Chair and Vice Chair of Council of Governors
Chair and Vice Chair of Council of International Regents and Governors

Level III: All committee members (including Chairs and Vice Chairs), all NetWork Steering Committee members, all Governors, all International Regents, all International Governors, NetWork members who participate in ACCP-sponsored activities, all associate editors of CHEST, and all editors of CHEST Physician.

2) COI RULES FOR LEVEL I LEADERS. 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).
- Except for investments in mutual funds, no holdings in stocks of pharmaceutical companies or any other commercial entities (e.g. device manufacturers) that manufacture or sell products related to management of individuals with disorders addressed by ACCP.
- No investments in tobacco companies except for mutual funds.
- Disclosure of any activities, investments, or employment of a spouse, domestic partner 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 ACCP.
- No service as board member or officer of any other national or international medical or professional society (see points of clarification below).
- No service as chair of a committee of any other national or international medical or professional society, except for limited exceptions as authorized

by the ACCP's decision-making body on COI. Serving as a committee member is permissible (see points of clarification below).

- Disclosure of activities as a member of any committee of any other national or international medical, professional society.
- No employment, consulting or advisory board activity for pharmaceutical companies and medical device companies, including ACCP-sponsored focus groups, except as authorized by the ACCP's decision-making body on COI (see points of clarification below).

3) COI RULES FOR LEVEL II LEADERS. Level II leaders are bound by the following COI rules during their term as Level II leaders:

- No promotional activities (see points of clarification below).
- Except for investments in mutual funds, no holdings in stocks of pharmaceutical companies or any other commercial entities (e.g. device manufacturers) that manufacture or sell products related to management of individuals with disorders addressed by ACCP.
- No investments in stocks of tobacco companies except for mutual funds.
- No service as board member or officer of any other national or international medical, or professional society (see points of clarification below).
- No service as chair of a committee of any other national or international medical or professional society, except for limited exceptions as authorized by the ACCP's decision-making body on COI. Serving as a committee member is permissible (see points of clarification below).
- Disclosure of activities as a member of any committee of any other national or international medical, professional society.

4) COI RULES FOR LEVEL III LEADERS. Level III leaders must disclose COIs and recuse themselves from discussions, as and when appropriate. Any person who works on an ACCP-sponsored activity must confirm or submit a current COI disclosure form before, and sometimes, during, the activity. Level III leaders are not subject to disassociation rules.

5) OTHER MATTERS.

- A) Date of implementation of these COI rules: February 1, 2011.
- B) Notification of the adopted policy will be sent to all members.
- C) These COI rules do not apply to The CHEST Foundation.
- D) Any clarifications of a conflict should be submitted in writing to the EVP/CEO for review and determination.
- E) Appeal of the decision will be referred to a COI appeals committee consisting of the Chair of the Ethics Committee (serves as Chair), Regent-at-Large serving on the Executive Committee, Regent-At-Large who

serves as liaison to the Ethics Committee, and another Regent-at-Large appointed by the President. Super majority (3/4) is required to reach a decision, which will be binding.

- F) A new COI disclosure form for all ACCP leaders and staff should be made available on-line.
- G) 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.

6) POINTS OF CLARIFICATION.

- A) Promotional activities are defined as those intended to enhance the image, well-being, stature or popularity of a product or commercial entity. Promotional activities may or may not be remunerated. Examples include, but are not limited to, serving as a spokesperson or on a speaker's bureau for a pharmaceutical company or medical device company, using a commercial entity's audiovisual materials, or public endorsements of products.
- B) The restrictions on service for other professional medical societies intend to avoid risk or perception of conflicting loyalties that could impair ACCP 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.
- 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.