

## Memorandum

February 9, 2022

TO: Members of the ASPS, PSF and PSPS Boards of Directors Members of the ASPS Trustees Members of the ASPS Judicial Council Chairs and Members of ASPS/PSF Committees, Subcommittees, Work Groups and Task Forces Editorial Boards of Plastic and Reconstructive Surgery and PRS Global Open

FROM: Aviva Preminger, MD, Conflict of Interest Committee Chair

## RE: Requirement to Annually Disclose Conflicts of Interest – Due Feb. 22, 2022

All Officers, Directors, Trustees, Judicial Council members, ASPS / PSF / PSPS Committee, Subcommittee, Work Group and Task Force leaders and members, and the Editorial Boards of PRS and PRS-Global Open ("Volunteer Leaders") are required to annually update or submit for the first time their <u>online Conflict of Interest ("COI") Disclosure Statement</u>. As the current leadership year (the 2022 term) began on Nov. 1, 2021 and continues to Oct. 30, 2022, we are reminding you of this requirement.

In addition to completing the COI Disclosure Statement each leadership year, Volunteer Leaders have a continuing obligation to promptly update their online COI Disclosure Statement to reflect any change in circumstances that may give rise to an actual or potential conflict.

**ACTION REQUIRED: Please update or complete your COI disclosure by Feb. 22, 2022.** Note that you must press two buttons (*I Agree* and *Submit*) at the end of the online form for your submission to be recorded. Even if there are no changes, Volunteer Leaders must hit the *I Agree* and *Submit* buttons to ensure your disclosure statement records a submission date in the current leadership year.

The COI Policy and the Disclosure Statement portion of the Policy underwent revisions in June 2021 to change the timeframe for which to report relationships. **The Disclosure Statement now asks you to report your current relationships and those you have had in the preceding 24 months.** 

The cornerstone of this procedure for disclosing conflicts of interest is the principle that, in most cases, disclosure of the conflicting or potentially conflicting interest will itself suffice to protect the integrity of Society and Foundation decisions. In other words, once such an

COI Policy and Disclosure Statement Memo February 9, 2022 Page 2

interest is fully disclosed to the other participants in any Society or Foundation activity, those other participants will be able to evaluate and adjust for the possible influence of the disclosed interest. At the same time, there will be certain matters for which the nature of the conflict of interest will require recusal of the member from a Board or committee discussion or vote.

Conflict of Interest materials can be found at <u>www.plasticsurgery.org/COI</u>, including the <u>COI</u> <u>Governing Documents</u>, the <u>ASPS/PSF Policy on Conflicts of Interest</u> and the online <u>Conflict of</u> <u>Interest Disclosure Statement form</u>.

The Governing Documents contains the Conflict of Interest Principles, which are to be used as a guidepost in addressing and resolving conflicts and incorporate by reference other documents adopted by the Society and The Foundation relating to or addressing conflict of interest disclosure and management.

The COI Policy defines a conflict of interest and provides specific examples of interests requiring disclosure. **The Policy notes that interests held by members of your immediate family require disclosure as well.** The Policy also provides a definition of financial interests, a description of affiliations requiring disclosure, and what is meant by support from commercial sources requiring disclosure. The Policy requires disclosure of *all* financial interests and *all* support from commercial sources, as defined in the Policy. The disclosure form follows the framework of the Policy and provides specific examples to guide you.

The Policy also provides a mechanism for resolving conflicts. It requires that the Society and Foundation Presidents, COI Committee Chair, and Executive Vice President review the Volunteer Leaders' disclosures and the Executive Committee and ASPS/PSF Board meeting agenda for potential conflicts in advance of each meeting and determine how best to resolve those potential conflicts. Similarly, the Committee Chair (and Co-Chair or Vice Chair when applicable) and Staff Liaison perform this function for committee, subcommittee, work group, and task force meeting agendas.

Should you have any questions about any aspect of the Policy, please contact Caitlin Podbielski, Esquire or Peggy Pissarreck at <u>COI-Inquiry@plasticsurgery.org</u>.

Additional Resources: <u>www.plasticsurgery.org/COI</u> <u>www.plasticsurgery.org/ConflictOfInterest</u>