



## Memorandum

November 9, 2020

**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: Michele Manahan, MD, Conflict of Interest Committee Chair

RE: Requirement to Annually Disclose Conflicts of Interest – Due Nov. 30

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 online Conflict of Interest ("COI") Disclosure Statement. As the new leadership year (the 2021 term) began on Oct. 19 and continues to Oct. 18, 2021, we are reminding you of this requirement.

In addition to completing the COI Disclosure Statement at the beginning of the 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 Nov. 30, 2020.** 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 August. One important change was the addition of a timeframe for which to report conflicts. The Disclosure Statement now asks you to report your current conflicts and those you have had in the preceding 12 months.

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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 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 <a href="https://www.plasticsurgery.org/COI">www.plasticsurgery.org/COI</a>, including the <a href="https://www.plasticsurgery.org/COI">COI Governing Documents</a>, the <a href="https://www.plasticsurgery.org/COI">ASPS/PSF Policy on Conflicts of Interest</a> and the online <a href="https://www.plasticsurgery.org/COI">CONFLICTOR OF Interest</a> and the online <a href="https://www.plasticsurgery.org/COI">Workery.org/COI</a>, including the <a href="https://www.plasticsurgery.org/COI">CONFLICTOR OF Interest</a> and <a href="https://www.plasticsurgery.org/COI">Workery.org/COI</a>, including the <a href="https://www.plasticsurgery.org/COI">Workery.org/CO

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, 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 COI-Inquiry@plasticsurgery.org.

Additional Resources: www.plasticsurgery.org/COI www.plasticsurgery.org/ConflictOfInterest