

## Memorandum

November 6, 2019

**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:** Norman H. Rappaport, MD, DDS, FACS, Conflict of Interest Committee Chair

**RE:** **POLICY ON CONFLICTS OF INTEREST AND DISCLOSURE STATEMENT**

Each leadership year, 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 submit the [online Conflict of Interest \(“COI”\) Disclosure Statement](#). (The 2020 leadership year began September 23, 2019 and continues to October 19, 2020.)

**ACTION REQUIRED:** Please update or complete your COI disclosure **by November 30, 2019**. 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 [ASPS/PSF Policy on Conflicts of Interest](#) (“Policy”) can be found at [www.plasticsurgery.org/COI](http://www.plasticsurgery.org/COI), along with a link to the online [Conflict of Interest Disclosure Statement form](#). The Policy defines a conflict of interest, provides specific examples of interests requiring disclosure, and includes a number of illustrations. The Policy notes that interests held by members of your immediate family, as defined in the Policy, 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. 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 meetings.

**The COI Policy and the Disclosure Statement portion of the Policy underwent revisions in June, and it is important for Volunteer Leaders to review them in detail.**

The first revision provides that a summary of the information disclosed by each Volunteer Leader, **including financial data**, will be provided to each Board, Committee, or Task Force member with the meeting agenda materials. Staff Liaisons will provide a link to this data, which is now available on the *Reports* tab of each [committee's site](#) after logging in.

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 webform to reflect any change in circumstances that may give rise to an actual or potential conflict.

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.

The Conflict of Interest Governing Document, which can be found at [www.plasticsurgery.org/COI](http://www.plasticsurgery.org/COI), provides additional information about conflicts of interest. The Governing Document includes 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.

We ask for your cooperation in completing or updating the COI Disclosure Statement online form as require policy by **November 30, 2019**.

*Should you have any questions about any aspect of the Policy, please contact Michael E. Reed, Esquire or Peggy Pissarreck at [COI-Inquiry@plasticsurgery.org](mailto:COI-Inquiry@plasticsurgery.org).*

*Additional Resources:*

[www.plasticsurgery.org/COI](http://www.plasticsurgery.org/COI)

[www.plasticsurgery.org/ConflictOfInterest](http://www.plasticsurgery.org/ConflictOfInterest)

