



Conflict of Responsibility Policy

The American Society of Diagnostic and Interventional Nephrology (ASDIN) believes that members of its council and others in positions of leadership have a responsibility to carry out the ASDIN's business for the benefit of the ASDIN. The ASDIN is a professional individual membership association, and as such recognizes that many of its members will have relationships with other entities, including pharmaceutical and device manufacturers, dialysis facility owners and other entities. Leaders of the ASDIN must ensure that when they consider any specific issue on behalf of the ASDIN, they do not have a substantial conflict of interest. We therefore establish this policy and procedures to manage conflicts of interest.

Definitions

Traditionally, a potential conflict between an individual's *personal* interests and a duty to an independent entity has been seen through the prism of "conflict of interest." The ASDIN recognizes that, because our leaders may be leaders of other organizations as well, potential conflict of "interest" must be understood to extend beyond the *personal* interest of a single individual or his immediate family. To elaborate, "conflict of interest" *per se* can be defined as any *personal* gain that can be obtained by an individual from the decisions made on behalf of another entity that are expected to be made objectively with no personal gain expected. Examples of this form of conflict may range from honoraria for industry sponsored educational activities to the very reimbursement that specialists obtain from payers each time they decide to perform a procedure.

As distinct from this definition of "conflict of interest," the policy articulated herein will attempt to apply more broadly to "conflict of responsibility." Conflict of responsibility is the concept that a leader's source of potential conflicts extends beyond the personal. Many of our leaders are councilors of other organizations, including the RPA, ASN, ISN, VASA, just to name a few. One can envision situations when the interest of the ASDIN and the aforementioned entities will conflict, regardless of the issue of *personal* gain. It is for this reason that the policy articulated herein is referred to as a Conflict of Responsibility Policy.

ASDIN considers a serious potential conflict of responsibility to exist when an ASDIN leader has a relationship with or engages in any activity that creates a risk such that the professional judgment or actions of an ASDIN leader regarding the ASDIN's mission, purpose, best interest, or core values may be unduly and inappropriately compromised.

In a practical sense, a serious perceived conflict of responsibility is generally defined as that level of involvement with outside relationships or interests which may cause questions or concerns related to the leader's motives with regard to executing ASDIN business, be they of a personal nature or not (conflict of personal interest is a subset of conflict of responsibility).

General Principles

1. Disclosure
 - a. The ASDIN will develop and maintain processes that document, review and track potential conflicts of responsibility for its leaders.

- b. A Conflict of Responsibility Form will be executed by July 1st each year by each member of the Council and Chairs of Standing Committees
 - c. The disclosure statement will name all leadership positions in dialysis organizations, industry, sponsored research and other medical or professional organizations.
 - d. The disclosure will include all financial relationships with these organizations, direct or indirect for the individual or his/her spouse including salaries, royalties, consultancies, speakers' bureaus, honoraria, income-generating relationships with health care facilities or other funding sources. Holdings in retirement funds or mutual funds will not be reported. The fee for Medical Directorship(s) of Dialysis Facilities is also excluded. Three categories of financial disclosure will be requested:
 - i. Less than \$10,000/year
 - ii. \$10,000 - \$50,000/year
 - iii. Greater than \$50,000/year
 - e. Ownership positions, stock holdings, or partnerships in organizations doing business in renal medicine will be disclosed when such positions exceed \$50,000 in value.
 - f. Members of the ASDIN leadership will recuse themselves from discussion and voting when conflicts of responsibility or the appearance of conflicts of responsibility are present. In cases where there is uncertainty regarding conflict of responsibility, the burden of proof that there is no conflict rests with the individual leader. Therefore, a conservative and cautious evaluation of one's potential conflicts is recommended.
2. Transparency and Standardization
- a. A uniform policy on potential bias and conflicts of responsibility will be reviewed annually by the ASDIN Industry Relations Committee.
 - b. All Potential Conflicts of Responsibility Forms will be made available to all members of the ASDIN upon request.
 - c. All potential conflicts of interest will be published on the ASDIN website.
3. Evaluation
- a. The Industry Relations Committee will review the Potential Conflict of Responsibility forms each year, and will make recommendations to the Council concerning any actions needed to maintain the integrity of the ASDIN.
 - b. A document outlining the principles this committee will follow will be prepared and reviewed annually by the ASDIN Council.



CERTIFICATION OF FULL DISCLOSURE

In order for the members of the ASDIN leadership to be fully informed during the conduct of the Association's business, any and all actual and potential conflicts of responsibility are required to be disclosed by each ASDIN leader on no less than an annual basis by July 1st of each year.

Such conflicts of responsibility must be disclosed to ensure that each member of the ASDIN leadership has the opportunity to formulate his/her individual opinions about the issues being addressed with knowledge of any leader's potential conflict with the issue. The intent of this policy is to fully disclose information, not to limit a leader's participation or credibility through disclosure.

You are required to sign and return this form annually during your tenure on the ASDIN Council and/or as Standing Committee Chair.

1. I and/or my spouse ***do not have*** a conflict of responsibility with regard to my service as an elected or appointed member of the ASDIN.

Signature
Printed Name
Date Signed

2. I and/or my spouse ***have*** a potential conflict of interest with regard to my service as an elected or appointed member of the ASDIN Council, or in my role as an ASDIN Committee Chair or Committee member, as indicated below. Details are to include ranges of dollar amounts where appropriate as follows. (A. Less than \$10,000 per year; B. \$10,000--\$50,000 per year; C. Greater than \$50,000 per year)

<u>Area</u>	<u>Please Check</u>	<u>Provide Details</u>
Board positions in renal-related nat'l organizations	<input type="checkbox"/>	
Chair of committee in renal-related nat'l org.	<input type="checkbox"/>	
Employee of dialysis company, pharma company, or device manufacturer	<input type="checkbox"/>	
Research or grant support	<input type="checkbox"/>	
Consulting arrangement	<input type="checkbox"/>	
Speakers' Bureau/Honorarium	<input type="checkbox"/>	
Income-generating relationships with health care facilities; income transcends practice	<input type="checkbox"/>	
Corporation stock holdings; partnerships	<input type="checkbox"/>	
Other (specify) _____	<input type="checkbox"/>	

Councilor/Committee Chair/Committee Member Signature:
Printed Name:
Date Signed: