



Approved: Board of Directors – 06/18/88
Revised: Board of Directors – 02/27/98
Revised: Board of Directors – 03/19/99
Revised: Board of Directors – 05/20/06
Revised: Board of Directors – 02/03/07
Revised: Board of Directors – 04/21/07
Revised: Board of Directors – 06/15/10
Revised: Board of Directors – 11/13/10
Revised: Board of Directors – 05/05/12
Revised: Board of Directors – 11/03/12
Revised: Board of Directors – 11/22/14
Revised: Board of Directors – 03/04/19
Revised: Board of Directors – 05/18/19
Revised: Board of Directors – 07/27/19

DISCLOSURE OF OUTSIDE INTERESTS AND MANAGEMENT OF CONFLICTS OF INTEREST

The American Academy of Dermatology is a professional organization committed to advancing excellence in dermatology through the education and professional development of dermatologists, and to enhance the care of patients with dermatologic disorders. In order for the Academy to operate most effectively to further the purposes for which it is organized, it is important that Academy decisions and actions not be unduly influenced or perceived to be influenced by any special interests of individual members. The integrity of the AAD is essential to maintain the confidence of physicians and the public. Therefore, it has always been and continues to be important to identify and manage conflicts of interest that might improperly affect Academy activities. Disclosure is the mechanism for identifying conflicts.

“Interests” are matters of significance to an individual and can be financial and nonfinancial. Financial interests are monetary such as wages, honoraria, stipends, stock, stock options, ownership, royalties, property, devices, and anything with monetary value (for further clarification on the ACCME definition of relevant financial relationships and commercial interests, see the *note on page 2). Non-financial interests are primarily intellectual and may include such things as authorship/publications, product development, promotions, appointments, honors and loyalties to other entities (e.g. member of another society Board, performing work for other entities, organizations, foundations).

For the purposes of this policy, “conflicts of interest” exist when there is a risk that the interest of a member covered by this policy interferes with or conflicts with the interests or mission of the Academy to the extent that it may appear to affect the ability of the member to work in the best interests of the Academy.

The presence of an interest **does not** imply a conflict and not all interests pose conflicts. One may have interests that have no relevance to matters of interest and importance to the Academy, or to the work of the individual with the Academy.

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“Relevant Interests” are those that bear significantly on issues of importance to the Academy membership (both CME-related and non-CME related) and about which different constituents of the Academy membership might hold widely differing views. An example would be the interests/potential biases associated with a member being employed or engaged by a government agency, medical device or pharmaceutical company or other health services entity at a time when the member is in a position to influence the development of Academy position statements, policies or clinical guidelines.

Financial interests are disclosed as part of the Academy annual financial disclosure. It should be recognized that nonfinancial interests may present conflicts of interest when matters relevant to the interest are part of Academy business. Nonfinancial interests may also be reported during the annual disclosure process. Any circumstances which would cause reasonable Academy stakeholders to suspect that the professional judgment of a member covered by this policy on matters relating to Academy business may have been improperly influenced by some secondary interest can be considered a conflict of interest. Therefore, in the spirit of transparency and to avoid perception of bias or undue influence, participants are responsible for disclosing these interests at the time of discussion when working on relevant matters.

The Academy has adopted a formal system for the disclosure and evaluation of conflicts of interest.

The principal features of that system are described below.

Conflicts of Interest Examples

1. Interests that may affect significant economic transactions to which the Academy is or may be a direct party. An example would be ownership by an Academy officer of a company from which the Academy makes major purchases of goods or services.
2. Interests that might cause a representative of the Academy to abuse an Academy position to achieve objectives that are inconsistent with the purposes of the Academy. An example of such exploitation would be a council or committee chair advocating for a particular company or unfairly maligning a company that competes with a company in which the chair has a personal financial interest.
3. Interests that bear significantly on issues of importance to the Academy membership and about which different constituents of the Academy membership might hold widely differing views. Examples include interests/potential biases associated with a member's employment by a government agency, academic medical center, hospital, multispecialty group, single specialty group, solo practice, private equity owned group, insurance company, medical device or pharmaceutical company; ownership in an EHR or data registry company; being an investor or having ownership in a company that provides any type of medical services or medical education; serves as an advisor, owner or consultant to a health insurance company; or participation in any other similar activities¹ when the

¹ Note: these are examples and not exclusive. Other types of financial relationships and other health services entities may present conflicts of interest.

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member is in a position to influence the development of related Academy position statements, policies or clinical guidelines.

- * [Note that for purposes of this conflict of interest policy, the Academy follows the definitions of *relevant financial relationships* and *commercial interests* adopted by the Accreditation Council of Continuing Medical Education (ACCME). The ACCME defines *relevant financial relationships* as financial relationships in any amount that create a conflict of interest and that occurred in the twelve-month period preceding the time that the individual was asked to assume a role controlling content of the CME activity. The ACCME has not set a minimal dollar amount—any amount, regardless of how small, creates the incentive to maintain or increase the value of the relationship. Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria for promotional speakers' bureau, ownership interest (e.g., stocks, stock options or other ownership interest (whether purchased or provided as compensation), excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected by the individual, his/her institution or his/her employer. The ACCME defines *commercial interest* as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.]

In many cases, disclosure of the potentially conflicting interest will itself suffice to protect the integrity of Academy operations. In other words, once such an interest is fully disclosed to the other participants in any related Academy activity, those other participants will generally be able to evaluate and adjust for the possible influence of the disclosed interest. However, it is important to bear in mind that in certain situations, adequate protection of the interests of the Academy may require scrupulous avoidance of even the appearance of conflict of interest, abuse or impropriety. In those situations where mere disclosure does not appear adequate to manage the conflict of interest, additional action such as recusal from discussion or vote may be the appropriate course of action.

Disclosure Process

1. Identifying possible non-financial conflicts of interest.
All participants in Academy activities are required to disclose any health care related financial interests, and interests related to issues relevant to the Academy project or activity. It is recognized that not all interests that benefit an individual are financial. While financial interests require annual disclosure, it is important to recognize that nonfinancial interests have conflict potential, thus when relevant topics arise, such interests should be verbally disclosed. In some activities and with certain Academy positions (officer, board member, council chair, clinical guidelines workgroup member), non-financial interest reporting may be required.
2. Identifying possible conflicts of interest by individuals occupying leadership positions.
The individuals covered by this section are the officers, all other members of the Board of

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Directors, the editors of *Journal of American Academy of Dermatology*² (JAAD) (including deputy editor, associate and assistant editors) and the editor of *Dermatology World*, all chairs and members of councils, committees, task forces, ad hoc task forces, work groups and senior staff. Annually, the individuals covered will be required to sign and submit a disclosure statement acknowledging a duty to serve the Academy in good faith and with undivided loyalty. These individuals must describe all personal or professional circumstances that might create a private interest in conflict with the interests of the Academy. Accompanying this policy statement as Exhibit A is a sample copy of such a disclosure statement.

In addition, “Key Leaders,” including the president, president-elect, immediate past president, secretary-treasurer, assistant secretary-treasurer, executive director, JAAD editor and JAAD deputy editor³, will be required to divest themselves of any “direct financial relationships”⁴ with industry during their entire term, utilizing the time from the close of the election to the time they take office to complete the divestiture process.

Members who do not disclose annually and who fail to update their disclosure within 30 days of acquiring a new financial relationship will lose the right to hold office, serve in the governance structure and, except in unusual circumstances approved in advance by the Board of Directors, to participate in Academy programs.

*Review Process for Service on a Council, Committee or Task Force (CCTF)*⁵

Members serving on a CCTF cannot have an outside interest that is an inherent conflict with the mission of the CCTF to which they are appointed. The following is the process for evaluating and managing potential conflicts.

- a. Officers, directors, chairs and members of councils, committees, task forces, ad hoc task forces, and work groups, the editors of JAAD and *Dermatology World* and senior staff will submit their disclosure statements online on the AAD Website.
- b. The disclosure statements for those members will be forwarded to the appropriate chair to review. The chair will review and forward to the secretary-treasurer those statements for members that appear to have conflicts that could prevent them from serving in the appointed capacity.

The secretary-treasurer will review the disclosure statements and make a final determination as to whether the appointee needs to vacate the position or divest/discontinue the conflicted activity.

² Inclusive of all the titles under the umbrella title of JAAD

³ Inclusive of all the editors and deputy editors under the umbrella title of JAAD.

⁴ For purposes of Key Leader disclosures, the definition of direct financial relationship is a compensated relationship held by an individual that should generate an IRS Form W-2, 1099 or equivalent income report. Key Leaders may provide uncompensated service to for-profit companies and accept reasonable travel reimbursement in connection with those services. Key Leaders may accept research support as long as grant money is paid to the institution or practice where the research is conducted, not the individual. Compensation (e.g., royalties) from intellectual property rights does not need to be divested. Exception may be made in certain circumstances for provision of consultant or investigator expertise related to protocol development and/or safety monitoring as long as the activities are not related to marketing or promotional efforts. In this event, the secretary-treasurer must be provided with background information and approval must be provided in advance for an exception to the policy. In these circumstances, compensation to the individual may not exceed \$10,000/company/year. Verifying 1099 forms must be submitted to the secretary-treasurer when received. This exception may not be applied to the president, who shall remain free from any and all direct financial relationships during his/her term of office.

⁵ CCTF is defined as the Board of Directors, council, committee, task force or any other entity within the AAD/A governance structure

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The secretary-treasurer may consult with the Professionalism and Ethics Committee or other leadership as required.

Managing Outside Interests

It is the responsibility of the chair or deputy chair within the Academy's governance structure to ensure that outside interests are disclosed and managed appropriately as they pertain to committee business. The following outlines expectation for how high, moderate and low conflicts are generally to be managed in accordance with the guide at the end of this policy. The chair or deputy chair may consult with the secretary-treasurer as needed.

- a. If a member has a **HIGH** level of conflict due to an active financial interest or intellectual interest associated with a high-risk entity related to the content of the CCTF's work, then they should recuse themselves from discussion, authorship and voting on that work;
 - b. If a member has a **MODERATE** level of conflict due to a) an active financial or intellectual interest associated with a low risk entity related to the CCTF's work or b) an active financial or intellectual interest associated to a high risk entity but not related to the CCTF's work, then they should generally participate in discussion but recuse themselves from authorship and voting.
 - c. If a member has a **LOW** level of conflict due to inactive financial interest as defined in the chart, then full participation is appropriate.
3. Standing Rule Regarding Disclosure of Interests by Participants in Debate at an Academy Membership Meeting. Accompanying this policy statement as Exhibit A is a copy of this standing rule. As suggested by the terms of the rule, its basic purpose is to inform the audience of aspects of a speaker's personal or professional circumstances that might affect the speaker's attitude or judgment regarding the particular matter under consideration. Written notice of this rule is to be included with membership meeting notices, and the rule is also to be announced at each meeting by the presiding officer.
 4. Continuing Medical Education and Maintenance of Certification Activities. As a CME provider accredited by the ACCME, the Academy has established policies and procedures to identify and resolve conflicts of interest for all individuals in a position to control the content of an educational activity. This includes but is not limited to the planning committee members, session directors, speakers ("faculty"), presenters, moderators, authors, peer reviewers and staff.
 5. Standing Rule Regarding Disclosure of Interests by Planning Committee Members, Session Directors, Speakers (faculty), presenters, moderators, authors, peer reviewers for Academy Scientific Sessions. Accompanying this policy statement as Exhibit B is a copy of that rule. As in the case of the rule regarding disclosure during debate at a business meeting of the Academy membership, this rule is intended to bring possible bias to the attention of the audience so that the members of the audience can evaluate the program content accordingly. Written notice of this rule is to be sent to the directors of, and prospective speakers at, symposia and other scientific programs, and the directors are to announce the

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rule at each scientific session.

6. Evidence-Based Clinical Guideline Development. The Academy is committed to minimizing the potential for health industry influence on the development of clinical guidelines of care and creating these documents with full transparency. Guideline work group members are required to disclose all relevant conflicts prior to their work group appointments and throughout guideline development in order to identify, resolve and manage conflicts. Refer to the administrative regulation that details the requirements for disclosure and management of all guideline contributors and approving bodies during guideline production and review.

7. Journal of the American Academy of Dermatology (JAAD) Conflict of Interest Statement.

The disclosure of a conflict of interest seeks to identify sources of bias that might affect the presentation of scientific analysis or opinion. It relates to disclosure of certain types of interests by the authors of manuscripts submitted for possible publication in *JAAD*. The primary areas of concern are:

- (1) financial support from pharmaceutical and device companies or other commercial interests for research that is the subject of a *JAAD* manuscript and
- (2) Financial interests on the part of authors in any products or services related to the subject matter of a *JAAD* manuscript.

Accompanying this policy statement as Exhibit C is a sample copy of a disclosure statement to be signed by each author of a manuscript submitted to *JAAD*. Disclosure of any conflict will alert the editors to the possibility of bias in the presentation, and it might also be appropriate in certain circumstances to publish information about the disclosed interest with the article in question so that each reader will have an opportunity to evaluate and adjust for the possible bias.

Because proper disclosure by each individual author, speaker, member or Academy leader is essential if the system is to function satisfactorily, it is important for everyone involved to approach with the proper perspective the question of what types of circumstances call for disclosure. The purpose of the procedure is not to discourage all involvement by Academy members in outside activities that might produce conflicts with interests of the Academy. Neither is the objective to intrude into aspects of an individual's professional or personal life that are, realistically, unlikely to have any significant bearing on Academy activities. Common sense should guide all decisions about what to disclose, and one reasonable test is whether a particular circumstance, interest or relationship, if made known to the full membership of the Academy or to the general public, would be likely to create the perception of impropriety, cause embarrassment for the Academy and/or the individual involved, or evoke suspicion about the motives behind any Academy action.

Exhibit A

Standing Rule Regarding Disclosure of Interests by Participants in Debate at an Academy Membership Meeting

In order for the members in attendance at an Academy membership meeting to evaluate properly statements and arguments presented during debate, it is important that the members be informed of any aspect of a speaker's personal or professional circumstances that might affect the speaker's attitude or judgment regarding the particular matter under consideration. Therefore, during any debate at a membership meeting, the presiding officer will ask each speaker participating in the

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discussion of a particular issue to introduce himself or herself by name and professional position and to identify any aspect of the speaker's personal or professional circumstances that might reasonably be expected to affect significantly the speaker's views on the subject under discussion. Any member who refuses to provide such information will be denied the opportunity to address the membership during the debate on that particular issue.

Exhibit B

I agree to abide by the Academy's administrative regulation on disclosure of conflicts of interest which outlines all financial relationships. The ACCME requires anyone in control of CME content to disclose relevant financial relationships to the accredited provider. Individuals must also include in their disclosure the relevant financial relationships of a spouse or life partner. The ACCME defines *relevant financial relationships* as financial relationships in any amount that create a conflict of interest and that occurred in the twelve-month period preceding the time that the individual was asked to assume a role controlling content of the CME activity. The ACCME has not set a minimal dollar amount—any amount, regardless of how small, creates the incentive to maintain or increase the value of the relationship. Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria for promotional speakers' bureau, ownership interest (e.g., stocks, stock options or other ownership interest (whether purchased or provided as compensation), excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected.



American Academy of Dermatology & Association **Disclosure Statement of Conflict of Interest**

I, _____, attest that I am completing the Academy electronic disclosure form as one of the following:

- Chair or member of a Council, Committee, Task Force, Ad Hoc Task Force or Work Group;
- Candidate for office or am a member of the Board of Directors;
- Editors of the *Journal of the American Academy of Dermatology* or *Dermatology World*;
- Contributor (planning committee members, session directors, speakers ("faculty"), presenters, moderators, authors, peer reviewers and staff) to a CME/MOC activity;
- Senior Staff,

I understand that I occupy a position of trust and that I am expected to act at all times in good faith and without bias or favor to outside interests. Whenever my outside interests or other responsibilities conflict with my duty to the Academy, I will declare these financial relationships and will act in such a manner as to avoid even the appearance of using my position to advance any

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personal interest or the interest of any individual or entity with whom I have a relationship. In particular, I will not act in a way inconsistent with the purposes and best interests of the Academy.

The Academy is accredited by the Accreditation Council for Continuing Medical Education (ACCME®). The Academy expects that every CME and MOC activity certified for credit will be in full compliance with the [ACCME® Essential Areas, Elements, Criteria, Policies, and Standards for Commercial Support of Continuing Medical Education](#).

The Academy has implemented a disclosure process that requires that all individuals in a position to control the content of an educational activity disclose all financial relationships with commercial interest(s), including both compensated relationships and ownership interests purchased with the member's own funds. This includes the planning committee members, session director(s), faculty presenters (speakers), authors, panel members, moderators, content validation reviewer(s), staff, etc. The ACCME defines *commercial interest* as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest. **If an individual refuses to disclose relevant financial relationships to the Academy, s/he will be disqualified from participating in the CME activity.**

If you are faculty selected to present/participate in a CME activity, you are required to review the definitions and complete the Disclosure and Attestation.

The disclosure information provided will be collected and included in the agenda materials sent prior to all governance conference calls and meetings. Additionally, this disclosure information will be communicated to our learners prior to their engaging in Academy educational activities.

I will disclose all financial relationship(s) with commercial interests in any amount occurring within the last 12 months as outlined in the [Accreditation Council for Continuing Medical Education \(ACCME\) requirements](#).

Disclosure Steps:

- A. List the names of commercial interests as defined by ACCME (see above) with the exception of non-profit or government organizations and non-health care-related companies with which you or your spouse/life partner has or has had, a financial relationship within the past 12 months.
- B. Identify the type of financial relationships received by you or your spouse/life partner (ex: salary, honorarium, etc.) from the commercial interests. The Academy does not need to know the dollar amount.
- C. Identify the role you or your spouse/life partner have with the commercial interest.
- D. If you or your spouse/life partner have received multiple items from the same commercial interest, or if you or your spouse/life partner has had more than one role for the same commercial interest, enter a separate record for each role/item received.
- E. Your current disclosures are listed in the table below. To remove an entry, click "Delete" Relationship" box, and then click the "delete this relationship" check box for the relationship you want to remove, then click "Confirm Delete".
- F. If you or your spouse/life partner's role or item received has changed but the relationship with a commercial interest still exists, you must select the "Edit" button to the right of the

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prior disclosure to update your information; then click the "Update" button for the relationship you want to update.

- G.** All prior disclosures you have entered for yourself or for your spouse/life partner are marked to be kept by default. If you need to remove a disclosure, please click on the "delete this relationship" check box for the particular relationship you want to remove; then click "Confirm Delete". New additional disclosures may be entered by clicking on the "Add" button to the right, enter the relationship and then click "Save and Continue" at the bottom of the page.
- H.** New/additional disclosures may be entered by clicking on the "Enter Additional Financial Disclosures" button below and then clicking "Save and Continue".

If you have NO financial relationship(s) to disclose:

- ☐ To the best of my knowledge, neither I, the undersigned, nor my spouse/life partner, has at present or has had within the past 12 months, financial interests/arrangements, affiliations, or other relationships with a commercial interest.

If you DO have financial relationship(s) to disclose:

- ☐ To the best of my knowledge, I, the undersigned, and/or my spouse/life partner currently has a financial interest/arrangement, affiliations, or other relationships with a commercial interest.

NATURE OF FINANCIAL SUPPORT OR COMPENSATION

(these will now be drop down menus online)

1. Select from the following the role for which you received financial support or compensation from a commercial interest:

- ☐ Advisory Board
- ☐ Board of Directors
- ☐ Consultant
- ☐ Data Safety Monitoring Board
- ☐ Employee
- ☐ Founder
- ☐ Independent Contractor
- ☐ Investigator
- ☐ Speaker
- ☐ Speaker/Faculty education
- ☐ Stockholder
- ☐ Other: please specify: _____

2. Select the type of financial support or compensation received:

- ☐ Equipment
- ☐ Fees
- ☐ Grants/Research Funding
- ☐ Honoraria
- ☐ Non-accredited CME Educational Grant
- ☐ Patent royalties or other compensation for Intellectual Property Rights
- ☐ Residency/Fellowship Program Funding
- ☐ Salary
- ☐ Stock
- ☐ Stock Option
- ☐ No Compensation Received
- ☐ Other Financial Benefit: please specify: _____

☐ I agree to update this form within 30 days after I establish any new financial relationships that could represent conflicts of interest.⁶

Company Name (will also be drop down)	(#1) For What Role?	(#2) What was received/purchased?	Money paid to you?	Money paid to your institution? ⁷	Purchased with your own funds
Example: ABC Pharma, Inc.	Advisory Board Member	Honoraria	X		
Example: Small Pharma, Inc	Consultant	Fee	X		
Example: XYZ Pharma, Inc	Principal Investigator	Research Grant		X	
Example; Big Pharma, Inc.	Stockholder	Stock			X

Under Commercial Interest Relationships, did you list a relationship as “Other” under the “For What Role” column or “Other Financial Benefit” under “Compensation”? If yes, please describe the relationship. Please also provide additional details about any relationship documented above or that does not meet the designated

⁶ The data presented here may differ somewhat from information in other publicly available databases. Some discrepancies may arise from different reporting periods or different definitions. While independent organizations, such as the Institute of Medicine and others, have called for a uniform method of reporting industry collaboration, there is yet a standard approach.

⁷ This means compensation that your institution received for your efforts on this study.

categories that requires disclosure under the AAD's Administrative Regulations or merits further explanation.

PRIMARY SOURCE OF INCOME AND POSITION

1. **What is your primary source of income?** *Examples: general dermatology patient care, dermatopathology, patient care-Mohs surgery, patient care-non-cosmetic dermatologic surgery, patient care-cosmetic surgery, patient care-pediatric dermatology, patient care-hospital, clinical trials/clinical research, basic science research, administration, non-patient care consulting, teaching, independent contractor, etc.*
2. **What is the employment model in which you work?** *Examples: solo practice, group practice, multi-specialty practice, health system, HMO, private equity-owned practice, university, hospital, small group concierge practice, clinical trials company, pharmaceutical or medical device company, other health care services company, locum tenens, government, Veterans Administration, public health clinic, corporate or independent contractor or consultant, other (describe) etc.*
3. **Are you a full or partial owner, or do you have shares in the entity for which you work?**
4. **If you have administrative responsibilities, what is your administrative level?**
Examples: manager, executive director, dept or division chair, dean, medical director, board of directors, chief of staff, residency director, chief medical officer, etc.

NONFINANCIAL INTERESTS

1. **Boards/Officer of Public or Academic Organizations.** *Examples: trustee, American Board of Dermatology; officer, Alternative Delivery System Corp.*
2. **Government Affiliation.** *Examples: consultant, FDA or National Library of Medicine; Research Review Committee for Applications of Computers in Medicine.*
3. **Dermatology Society Leadership Position** *(officer, director, member or chair of a committee).*
4. **Editor or Author of Scientific Publications.** *Examples: author, Dermatology Times; editor, Archives in Dermatology.*
5. **Editor or Author of Non-Scientific Publications.** *Examples: assistant editor, Journal of Dermatology Marketing and Practice Management; author, Cosmetics for the Lay Person.*
6. **Other Relationships**

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I acknowledge my continuing obligation to report to the secretary-treasurer of the Academy, promptly online, any material change in the nature or setting of my professional activities or any conflict of interest, *e.g.*, conflict between, on the one hand, the interests of the Academy and, on the other, my personal interests or those of my spouse/life partner, that comes to my attention in the future. I will also verbally acknowledge any changes to this written disclosure at the time of my participation in an Academy meeting or event. I attest to the best of my knowledge that this is a complete and true disclosure and, that if found to be otherwise, would be grounds for discipline.

Signature

Date

Printed Name

Exhibit C

- ☐ I agree to abide by the Academy's administrative regulation on disclosure of conflicts of interest which outlines all financial relationships.



American Academy of Dermatology & Association
Disclosure of Outside Interests & Management of Conflict of Interest Statement

I, _____, attest that I have submitted for consideration for possible publication in the *Journal of the American Academy of Dermatology (JAAD)* a manuscript entitled:

I hereby certify that, to the best of my knowledge, (1) the work that is reported on in said manuscript has not received financial support from any pharmaceutical company or other commercial interest (see definition below), and (2) neither I nor my spouse/life partner has any special financial interest in the subject matter discussed in said manuscript, except as described below. (I understand that an example of one type of such special financial interest would be ownership, by me or my spouse/life partner, of a company that sells a product relating to the subject matter of the manuscript.)

Describe any exceptions. Use additional page(s) if space below is insufficient.

Disclosure Steps:

The ACCME requires anyone in control of CME content to disclose relevant financial relationships to the accredited provider. Individuals must also include in their disclosure the relevant financial relationships of a spouse or life partner.

Definitions

Financial Relationships: Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria for promotional speakers' bureau, ownership interest (e.g. stocks, stock options, or other ownership interest, whether purchased or provided as compensation excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching,

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membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected.

Relevant Financial Relationships: The ACCME defines relevant financial relationships as financial relationships in any amount that create a conflict of interest and that occurred in the twelve-month period preceding the time that the individual was asked to assume a role controlling content of the CME activity. The ACCME has not set a minimal dollar amount for a relationship to be established—any amount, regardless of how small, creates the incentive to maintain or increase the value of the relationship.

Commercial Interest: Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used by, patients is considered a commercial interest. The ACCME does not consider providers of clinical service directly to patients to be commercial interests – unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.

- A. List the names of commercial interest as defined above with which you or your spouse/life partner have a financial relationship.
- B. Identify the type of ownership interest or compensation you or your spouse/life partner received (ex: salary, honorarium, etc.). The Academy does not need to know the dollar amount.
- C. Identify the role you or your spouse/life partner have with the commercial interest.
- D. If you or your spouse/life partner have received multiple items from the same commercial interest or if you or your spouse/life partner have had more than one role for the same commercial interest, enter a separate record for each role/item received.

If you have NO financial relationship(s) to disclose:

- ☐ To the best of my knowledge, neither I, the undersigned, nor my spouse/life partner, has financial interests/arrangements, affiliations, or other relationships with the commercial supporter(s) of this activity or with any other organization(s) that provide(s) products or services that are relevant to the content for which I am responsible.

If you DO have financial relationship(s) to disclose:

- ☐ To the best of my knowledge, I, the undersigned, and/or my spouse/life partner currently has a financial interest/arrangement, affiliations, or other relationships with the commercial supporter(s) of this activity or with another organization(s) that provide(s) products or services that are relevant to the content for which I am responsible.

NATURE OF FINANCIAL SUPPORT OR COMPENSATION

(these will now be drop down menus online)

1. Select from the following the role for which you received financial support or compensation from a commercial interest:

- ☐ Advisory Board
- ☐ Board of Directors
- ☐ Consultant
- ☐ Employee
- ☐ Founder
- ☐ Independent Contractor
- ☐ Investigator
- ☐ Speaker
- ☐ Speaker/Faculty education
- ☐ Stockholder
- ☐ Other: please specify: _____

2. Select the type of financial support or compensation received:

- ☐ Equipment
- ☐ Fees
- ☐ Grants/Research Funding
- ☐ Honoraria
- ☐ Non-accredited CME Educational Grant
- ☐ Patent royalties or other compensation for Intellectual Property Rights
- ☐ Residency/Fellowship Program Funding
- ☐ Salary
- ☐ Stock
- ☐ Stock Option
- ☐ No Compensation Received
- ☐ Other Financial Benefit: please specify: _____

- | |
|---|
| <input type="checkbox"/> I agree to update this form within 30 days after I establish any new financial relationships that could represent conflicts of interest. |
|---|

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Company Name	For What Role?	What was received?	Money paid to you?	Money paid to your institution? ⁸	Purchased with your own funds
Example: ABC Pharma	Advisory Board Member	Honoraria	X		
Example: Small Pharma	Consultant	Fee	X		
Example: XYZ Pharma	Principal Investigator	Research Grant		X	
Example: Big Pharma	Stockholder	Stock			X

- ☐ I agree to update this form within 30 days after I establish any new financial relationships that could represent conflicts of interest.

Under Commercial Interest Relationships, did you list a relationship as “Other” under the “For What Role” column or “Other Financial Benefit” under “Compensation”? If yes, please describe the relationship. Please also provide additional details about any relationship documented above or that does not meet the designated categories that requires disclosure under the AAD’s Administrative Regulations or merits further explanation.

PRIMARY SOURCE OF INCOME AND POSITION

- 1. What is your primary source of income?** *Examples: general dermatology patient care, dermatopathology, patient care-Mohs surgery, patient care-non-cosmetic dermatologic surgery, patient care-cosmetic surgery, patient care-pediatric dermatology, patient care-hospital, clinical trials/clinical research, basic science research, administration, non-patient care consulting, teaching, independent contractor, etc.*
- 2. What is the employment model in which you work?** *Examples: solo practice, group practice, multi-specialty practice, health system, HMO, private equity-owned practice, university, hospital, small group concierge practice, clinical trials company, pharmaceutical or medical device company, other health care services company, locum tenens, government, Veterans Administration, public health clinic, corporate or independent contractor or consultant, other (describe) etc.*

⁸ This means compensation that your institution received for your efforts on this study.

3. **Are you a full or partial owner, or do you have shares in the entity for which you work?**
4. **If you have administrative responsibilities, what is your administrative level?**
Examples: manager, executive director, dept or division chair, dean, medical director, board of directors, chief of staff, residency director, chief medical officer, etc.

NONFINANCIAL INTERESTS

1. **Boards/Officer of Public or Academic Organizations.** *Examples: trustee, American Board of Dermatology; officer, Alternative Delivery System Corp.*
2. **Government Affiliation.** *Examples: consultant, FDA or National Library of Medicine; Research Review Committee for Applications of Computers in Medicine.*
3. **Dermatology Society Leadership Position** *(officer, director, member or chair of a committee).*
4. **Editor or Author of Scientific Publications.** *Examples: author, Dermatology Times; editor, Archives in Dermatology.*
5. **Editor or Author of Non-Scientific Publications.** *Examples: assistant editor, Journal of Dermatology Marketing and Practice Management; author, Cosmetics for the Lay Person.*
6. **Other Relationships**

I hereby grant permission for any such information, or an appropriate summary thereof, to be published in *JAAD* with the manuscript if the manuscript is accepted for publication. I attest to the best of my knowledge that this is a complete and true disclosure and, that if found to be otherwise, would be grounds for discipline.

Signature

Date

Printed Name

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Guide for Assessing Conflict of Interest Levels

- Financial: involves money/monetary value, e.g. wages, honoraria, equipment, royalties
- Nonfinancial: intellectual, not involving money e.g. publications, editorial involvement, officer, Board or committee member of another organization
- Direct: benefit applies to the AAD member
- Indirect: benefit applies to another person/party e.g. spouse income, funds paid to department or institution for AAD member's work
- Active: current
- Inactive: not current but existed within past year

The severity of a COI guides management of the conflict. The following table, adapted from the American College of Physicians (ACP), assists in determining severity and management of COI. Some AAD activities, such as those generating clinical practice guidelines, may take more stringent approaches to managing conflicts of interest due to commonly accepted external standards.

CONFLICT OF INTEREST LEVEL ⁹		
High	Moderate	Low
TYPE OF INTEREST		
<ul style="list-style-type: none"> • Active financial interest associated with a high-risk* entity <u>and</u> related to the content of the AAD work. <ul style="list-style-type: none"> • Direct or indirect • Active non-financial (intellectual) interest associated with high risk entity <u>and</u> related to content of AAD work one is involved in <ul style="list-style-type: none"> • Direct or indirect 	<ul style="list-style-type: none"> • Active financial interest associated with a low-risk entity <u>and</u> related to the AAD work <ul style="list-style-type: none"> • Direct or indirect • Active financial interest associated with a high-risk entity <u>and</u> not related to the AAD work <ul style="list-style-type: none"> • Direct or indirect • Active indirect non-financial interest associated with a high-risk entity <u>and</u> related to the AAD work • Non-financial interest associated with a low risk entity <u>and</u> related to the AAD work <ul style="list-style-type: none"> ○ direct or indirect ○ active or inactive 	<ul style="list-style-type: none"> • Inactive financial interest <ul style="list-style-type: none"> • Direct or indirect • Related or not related to the AAD work • High or low risk entity • Active financial interest associated with a low-risk entity <u>and</u> not related to the AAD work <ul style="list-style-type: none"> • Direct or indirect • Non-financial interest associated with a low risk entity <u>and</u> not related to the AAD work <ul style="list-style-type: none"> ○ Active or inactive ○ Direct or indirect
CONFLICT MANAGEMENT APPROACH		
Consider limiting discussion, authorship and voting.	Discussion generally allowed; consider limiting authorship and voting.	Participation generally not restricted

*High risk entities – are those with substantial financial interest in healthcare-related entities, such as the pharmaceutical or insurance industry; device and equipment manufacturers, EHR and data registry companies, etc.

**Low risk entities are those with little financial interest, such as government or nonprofit organizations not focused on a specific clinical area of interest to the issue of involvement or work.

⁹ Used with permission from the American College of Physicians