

## **ADDENDUM E**

### **CONFLICT OF INTEREST POLICY**

The American Dental Hygienists' Association ADHA is a not-for-profit association which provides support, directly or indirectly, for a variety of activities in the areas of research, education, promotion, and advocacy. The integrity of such activities, as well as that of the Association generally, is dependent on the avoidance of conflicts of interests, or even the appearance of such conflicts, by the participants.

At the same time, ADHA recognizes that the elected and appointed leaders of ADHA, as well as others acting on the Associations behalf, also have significant professional, business and personal relationships. Therefore, ADHA has determined that the most appropriate manner in which to address actual, potential or apparent conflicts of interest is primarily through liberal disclosure of any financial or other interest which might be construed as resulting in such a conflict. This Policy should not be construed as creating a presumption of impropriety. Rather, it reflects ADHA's recognition of the many factors that can influence ones judgment and a desire to make as much information as possible available to other participants in ADHA-related matters.

Any individual involved in an ADHA activity or decision-making process shall have an obligation to disclose a significant financial interest in or other relationship with, an entity having a commercial interest in the activity or outcome of the decision. A commercial interest may exist not only where the entity's products or services are under consideration by the Association, but also where the entity's products or services are in competition with those under consideration. By the disclosure of such interests, ADHA will be in a better position to determine whether the participant may have an interest in conflict with the interests of ADHA.

ADHA is primarily concerned with potential conflicts of interest involving those individuals participating directly in ADHA-related activities. Potential conflicts of interest also may arise, however, if an individual with whom the participant directly shares income (e.g., a spouse) has a financial interest in, or other relationship with, an entity having a commercial interest in the activity or matter under consideration.

Financial interests or relationships requiring disclosure include, but are not necessarily limited to, the following:

#### Employment

Any full- or part-time employment must be disclosed.

#### Consultancies

Consultant arrangements must be disclosed if (i) the consultation is current or proposed; or (ii) the consultation was performed, or payments were made for such consultation, within the prior two years.

### Ownership Interests

Any ownership interests (including stock options but excluding indirect investments through mutual funds and the like) in a company, the stock of which is not publicly traded, must be disclosed. If the company is publicly traded, ownership interests valued at \$1,000 or more must be disclosed. In addition, any other ownership interests in an entity having a commercial interest in an activity or matter under consideration by ADHA must be disclosed.

### Honoraria

Honoraria are reasonable payments for specific speeches, seminar presentations, or appearances. Disclosure of honoraria is required in the event the amount paid, or about to be paid, is equal to or greater than \$1,000 per year or \$2,500 over a three-year period.

### Research funding

Receipt of funds for conducting research must be disclosed. Moreover, research funding which varies according to research outcomes or which is not commensurate with the requisite effort is particularly relevant.

### Leadership Role in Other Organizations

Any leadership role (e.g., as a Board member, committee member, advisor) in another organization must be disclosed.

The nature of the required disclosure may vary according to the circumstances. In most instances, disclosure of the conflicting or potentially conflicting interest will itself suffice to protect the Association's interests. In other words, once such a conflict is fully disclosed to the relevant parties, they generally will be able to evaluate the possible influence of the disclosed interest. In relatively limited situations where such disclosure does not appear to deal with actual or potential problems, additional action, including denial of participation in the subject activity or consideration of the matter, may be necessary. It will be the responsibility of the appropriate ADHA leaders to interpret and apply the guidelines to fit the particular circumstances.

Integral to the implementation of the Conflict of Interest Policy is the ADHA Conflict of Interest Disclosure Form, a copy of which is attached, which shall be considered a part of the Conflict of Interest Policy and must be submitted by any individual desiring to participate in an ADHA activity. Disclosure Forms shall be kept on file by the ADHA staff for a period of two years, or 1 year after the conclusion of the activity or decision-making process, whichever is longer, unless otherwise determined by the Board.

In order to facilitate implementation of the Conflict of Interest Policy, the Board of Trustees, or their designee(s), shall determine when an individual engaged in, or about to engage in, an ADHA -related activity or other matter under consideration has an actual, potential, or apparent conflict of interest requiring some response by ADHA. Specifically, subject to the procedures set forth herein, the Board may require any action it deems appropriate, including, but not limited to, the following:

- (1) Disclosure of the interests to the other participants in the decision- or policy-making body (e.g., committee, editorial board, affiliated society).
- (2) Written and, in some cases, oral disclosure of the interest (e.g., to an audience receiving the results of clinical research or at scientific or educational sessions).
- (3) Recusal from voting on a matter and limitation of the individual's participation only to the provision of factual information of benefit to the group discussion.
- (4) Complete recusal from a portion of a meeting or from other consideration of the subject matter.
- (5) Replacement of the individual in the subject position or activity.

All participants in ADHA-related activities must comply with the ADHA Conflict of Interest Policy. Committee chairs, editors, etc., may be specifically designated by the Board to interpret and apply the Policy. Inasmuch as the Policy is stated in general terms, however, the appropriate ADHA leaders are expected to use their best judgment to interpret and apply the Policy to the particular circumstances presented before them.

**CONFLICT OF INTEREST  
DISCLOSURE FORM**

**NAME:** \_\_\_\_\_

**ACTIVITY:** \_\_\_\_\_

**1. Employment**

Please list the individuals or entities for which you<sup>1</sup> are now or about to be employed, or for which you have been employed within the past three years.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**2. Consultancies**

Please list any individual or entity for which you are now providing, or are about to provide, consulting services, as well as any individual or entity for which you performed such services, or by which you were paid, during the past two years.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**3. Ownership Interests**

Do you have any ownership interests (including stock options) in a company, the stock of which is not publicly traded?

No \_\_\_\_\_ Yes \_\_\_\_\_ Please List:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

<sup>1</sup> With respect to each question, "you" includes you as well as anyone with whom you directly share income.

Do you have any ownership interests (including stock options but excluding indirect investments through mutual funds and the like) valued at \$1,000 or more in a publicly traded company?

No \_\_\_\_\_

Yes \_\_\_\_\_

Please List:

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Do you have any other ownership interests in a commercial entity that reasonably may be anticipated to conflict with the interests of ADHA?

No \_\_\_\_\_

Yes \_\_\_\_\_

Please List:

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**4. Honoraria**

Have you been paid within the last three years, or do you expect to be paid, honoraria exceeding \$1,000 per year or \$2,500 over a three-year period?

No \_\_\_\_\_

Yes \_\_\_\_\_

Please List:

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**5. Research Funding**

Have you received any research funding within the past three years, or are you about to receive such funding?

No \_\_\_\_\_

Yes \_\_\_\_\_

Please List:

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**6. Leadership Role in Other Organizations**

Do you serve in a leadership capacity (e.g., Board member, committee member, advisor) for any other association, society, or foundation?

No \_\_\_\_\_

Yes \_\_\_\_\_

Please List:

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**Signature Required**

**I represent that the information reported above is accurate. I understand that, where appropriate, this information may be disclosed publicly. I further understand that failure to complete this Disclosure Form when so requested will automatically disqualify me from participating in the affected activity.**

Submitted by: \_\_\_\_\_ Date:

\_\_\_\_\_