

I. DEFINITIONS

Conflict of Interest

“A conflict of interest exists when an individual in a position of trust is required to exercise judgment on behalf of others (people, organization, institutions), but that individual also has interests or obligations of the sort that might interfere with the exercise of judgment. In such instances, the person is morally required to either *avoid the conflict or openly acknowledge it*. The lesser requirement of open acknowledgment is usually adopted when it seems too burdensome to require that the person in a position of trust divest herself of the interest that conflicts with her position of responsibility. For example, some journals require that authors disclose any substantial financial interests that might have biased their research assessment. Requiring investigators to divest themselves of investments that they may have made on the basis of their scientific judgment would be too burdensome, and might even suppress publication. ... one needs to look carefully at the nature of a professional's or public official's obligations and responsibilities in order to know when conflicting interests become a conflict of interest, that is, when a situation that requires discretion to handle the actual or potential conflict fairly is one that he is morally required to *avoid altogether*, or at least to *disclose to all parties*. Policies requiring financial disclosure, that is disclosure of financial interests that might conflict with judgment as a researcher or as public official, are very commonly called "conflict of interest policy," although such financial conflict of interest is only one specific type.” (Source: The Online Ethics Center Glossary: <http://www.onlineethics.org/glossary.html#anchC>)

Disclosure

Although the required disclosure of financial interests by scientific investigators is most often discussed relative to the pharmaceutical industry, the moral obligation to disclose personal interests that may affect one's judgment when representing an organization extends to all financial interests and obligations. In the field of sleep research this would include support or vested interest in any industry that may affect an investigator's judgment relative to the position he or she holds in the Sleep Research Society. It is essential that scientists disclose any involvement with companies that make devices to monitor sleep, sleepiness, or sleep-related phenomena (e.g., activity monitors, cardiovascular measures, etc.); as well as companies that make or sell interventions for sleep disorders, such as pharmaceuticals, devices (e.g., CPAP machines), or proprietary techniques (e.g., mathematical algorithms, etc.); and companies that offer for-profit services (e.g., sleep medicine networks and CME companies). Financial disclosure should include all payments, as well as covered expenses (e.g., free trips, lodging, meals, gifts, etc.). All grants, awards and payments from industry should be divulged, along with any consultative or advisory board payments, and any ownership positions in companies.

II. DISCLOSURE POLICY

SRS Board of Directors

The oversight and management of the Sleep Research Society (SRS) is the responsibility of the SRS Board of Directors. To assure maximal objectivity in the management of this organization, it is necessary for members of the SRS Board of Directors to publicly disclose every professional relationship with commercial or private entities that impacts the financial or professional status of the Board member and/or members of his/her family. Only by such full disclosure and appropriate monitoring can members of the scientific/medical community and the lay public be assured that the SRS operates with minimum bias.

Relationships of financial or professional nature with commercial or private entities need not preclude service by individuals on the Board of Directors. However, given that many specialists/investigators in the field will be impacted by accepted decisions made as part of managing the SRS, certain relationships will rightly preclude certain individuals on the Board of Directors from participating in the process of making certain decisions.

Disclosure should be made in full, in writing, annually as a matter of record. Updated disclosure forms must be submitted at such times during the year when either: (a) new financial or professional relationships are established, or (b) previously disclosed financial or professional relationships are terminated. In addition, public disclosure should be made by the person at the time in which an issue involving a conflict of interest is discussed. The governing body meeting at the time of such disclosure should elicit statements of conflicts of interest before

each agenda item is discussed, allowing time to decide whether the disclosing individuals should recuse themselves from further discussions on the topic.

Disclosure forms should be returned to the President of the SRS c/o the National Office. After initial review by the SRS Executive Committee or Designees, they will be kept on file in the National Office. Information in the disclosure forms will be available for discussion by the Board of Directors. The information in these forms will be considered strictly confidential and will not be available to other persons without the written consent of the particular individual.

The basis for operational definitions relevant to most conflicts detailed in the SRS COI policy is the premise of personal financial gain to the SRS Board member from for-profit and certain non-profit entities. Although disclosure of financial or professional relationships with for-profit or certain non-profit entities form the basis of most conflict of interest policies, it is also recognized that appointments to Boards of Directors of other professional societies, academic appointments or professional relationships may result in conflicts of interest of a non-financial nature. Membership on all boards must be disclosed, and may form the basis for recusal during discussion of agenda items dealing with interactions among the SRS and other professional societies. Memberships on the Board of the Associated Professional Sleep Societies (APSS) and the Board of Directors of the SRS Foundation are exempt from this COI provision. Additional conflicts of interest that are non-financial in nature include the bestowing of honors or awards upon individual members of the society. Members of the SRS Board of Directors during their tenure on the Board will not be eligible for honors or awards granted by the society. Members of the Board will be required to recuse themselves from discussions of potential honorees when individuals under consideration for such awards are from the same institution, are current or recent collaborators, or have otherwise interacted with the Board member in a manner that may be perceived as a conflict of interest (e.g., current or recent [within last 3 years] students, etc.)

Members of SRS Committees

Members of committees established by the SRS Board of Directors in accordance with the organization's bylaws will be held to the same standards and policies with respect to disclosure as established for the SRS Board of Directors.

III. CRITERIA

Financial or professional relationships will be classified into one of three categories:

Category I. Relationships are such that individuals **will be** unable to participate in the decision making process. Such is the case if the management decision under review addresses a type of device or medication that is owned by or contractually obligated (licensed) to a business in which the individual or family member holds stock or similar ownership interest, or has any other financial interest other than that due to University or Hospital supervised support.

Category II. Relationships that need not, **but may** preclude participation the process of decision-making for the SRS. Such is the case if an individual or family member participates in research, serves on a scientific advisory board of a business, participates in speaker's bureaus or has an executive position in a non-profit business related to a device or medication that is the subject of a management decision under review.

Category III. Disclosed relationships that result in a conflict of interest in a technical sense, are allowable because they are accepted practices with minimal financial and professional impact. Such is the case if an individual or family member receives royalties for published works or other writings, accepts honoraria for commissioned papers or lectures, or receives academic institution-approved royalties.

Members of the Board of Directors will be expected to automatically recuse themselves from evaluation of any management decision if they have a Category I conflict. Furthermore, they will exclude themselves from participation in the case of Category II conflicts if there is any possibility of perceived impropriety. In those situations where it is uncertain whether a Category I or II conflict exists, the President of the SRS will resolve the matter.

**SLEEP RESEARCH SOCIETY
DISCLOSURE FORM**

NAME:

_____ (Last) (First) (Deg.)

PHONE: () _____ - _____ **FAX:** () _____ - _____

E-mail: _____

ADDRESS:

ACADEMIC TITLE AND AFFILIATION:

OPERATING DEFINITIONS

1. **BUSINESS:** Any corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint stock company, receivership, business or real estate trust, or any other legal entity organized for profit or charitable purposes.
2. **FAMILY:** Spouse, children, parents, siblings, or other persons living in the same household.
3. **FINANCIAL INTEREST:** An interest in a business consisting of any stock, stock option or similar ownership interest in such business, but excluding any interest arising solely by reason of investment in such business by a mutual, pension, or other institutional investment fund over which the individual does not exercise control, or receipt of, or the right or expectation to receive, any income from such business, whether in the form of a fee, salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty derived from the licensing of technology, rent, capital gain, real or personal property, or any other form of compensation, or any combination thereof.
4. **PARTICIPATION:** To be part of the described activity in any capacity, including but not limited to serving as the principal investigator, co-investigator, research collaborator or provider of direct patient care. The term is not intended to apply to individuals who provide primarily technical support or who are purely advisory, with no direct access to the data (e. g. control over its collection or analysis).
5. **TECHNOLOGY:** Any compound, drug, device, algorithm, or diagnostic, medical, or surgical procedure intended for use in health care or health care delivery.

Declarations

Please circle “YES” or “NO” for each question. If you answer “YES” to any question, please state the nature of the relationship, as indicated. Use additional space as necessary.

1. Do you hold paid or unpaid membership(s) on **industry/corporate** (for profit) board(s) of directors or scientific or financial advisory boards related to sleep research or sleep medicine?

YES (List names of all industries or corporations):

NO

2. Do you serve on **board(s) of directors** or advisory board(s) of a **professional organization(s)** other than the SRS? (excluding the APSS or SRS Foundation Boards)

YES (List names of all organizations):

NO

3. Do you or a family member **have financial interest in, or own part or all of a company** selling sleep products or services *or* **stock** in such a company, including ownership of a sleep center by a practicing sleep physician? (mutual funds excluded)

YES (List names of all companies):

NO

4. Have you accepted payments (honoraria) for **speaking engagements from industry** within the last year or have contracted to accept such payments in the future? Have you received funds from CME-granting organizations? (unrestricted educational grants excluded)

YES (List names of all industries/sources of funds):

NO

5. Are you a member of an **industry speaker’s bureau**?

YES (List names of all bureaus):

NO

6. Have you or a family member received **consultation fees** from industry or a sleep-related business within the last year? Have you or a family member received a **personal gift** (value >\$500), including travel to scientific or business meetings, provided by a sleep-related business within the last year? Has your institution received a gift from industry or a sleep-related business as a result of your professional relationship?

YES (List names of all companies):

NO

7. Have you or a family member received a **research grant or contract** from **industry** within the last year?

YES (List names of all companies):

NO

SIGNATURE: _____ **Date:** _____