

BOARD OF REGENTS POLICY

American College of Chest Physicians

Guiding Principles for Interactions with Commercial Entities

(Adopted by the BoR and effective January 25, 2019)

I. Preamble

These guiding principles are designed to support the objectives of the American College of Chest Physicians ("CHEST") to maintain and advance high standards of medical practice in cardiopulmonary medicine and surgery, critical care, sleep medicine and related disciplines worldwide. CHEST can attain these objectives only if it maintains its reputation in the scientific and medical communities and with the general public as a credible, objective and unbiased entity. The following principles were developed to help ensure independence of CHEST's educational, scientific, and charitable activities and to address and minimize actual or perceived conflicts of interest in CHEST's various interaction with commercial entities.

II. Principles for Interaction with Commercial Entities

1. Independence

1.1 CHEST will develop accredited educational activities, scientific programs, products, services and positions independent of commercial entities and will adopt policies and procedures that foster independence.

1.2 CHEST will separate its efforts to seek support for its various activities in the form of educational grants, corporate sponsorships, industry-facing products, charitable contributions, and grants to support research from its programmatic activities.

1.3 Interactions between CHEST and commercial entities and in particular solicitation of support from commercial entities, are to be under the overall direction of the CHEST Executive Vice President working with the CHEST President, President-Elect, Immediate Past President, and President-Designate.

1.4 CHEST will use written agreements with commercial and other external entities for educational grants, corporate support, charitable contributions, business transactions, and grants to support research.

1.5 Whenever possible, CHEST will seek funding from a variety of sources. Occasions may arise when support of a specific event, publication, product or service from a single source is appropriate. During these occasions, CHEST will exercise special caution to avoid conflicts of interest and guard against any perception of conflict of interest.

1.6 CHEST will not solicit or accept support or agree to allow CHEST's name to be used in a manner that could be interpreted to indicate endorsement of any commercial product or activity related to pulmonary, critical care, or sleep medicine.

2. Transparency

2.1 CHEST's Consolidated Policy on Conflict of Interest, Commitment and Disclosure will be made available to the public on the CHEST website.

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2.2 CHEST will make information concerning accredited educational grants, corporate sponsorships, charitable contributions and support for research available to its members and the public.

3. Accepting Charitable Contributions from Commercial Entities

3.1 CHEST will control the use of charitable contributions from commercial entities in a manner that is aligned with its strategic plan and objectives.

3.2 CHEST will decline charitable contributions from commercial entities where the external entity expects to influence CHEST's activities or advocacy positions, or where restrictions required by the external entity would influence CHEST's programs or advocacy positions in a manner that is not aligned with CHEST's objectives.

3.3 CHEST will adhere to applicable tax rules and legal standards for acceptance of charitable contributions.

3.4 CHEST may impose reasonable restrictions consistent with its objectives on the acceptance and use of charitable contributions.

3.5 CHEST will provide recognition of donations by commercial entities that is consistent, appropriate and that does not suggest or imply donor influence over CHEST's programs or advocacy position.

4. Accepting Commercial Support

4.1 CHEST will only accept support for an activity if the activity is aligned with its strategic plan and objectives.

4.2 Corporate supporters must provide a product or service that is compatible with CHEST's image, its objectives and its values.

4.3 To diminish any suggestion that a particular commercial entity has undue influence over a program or activity, CHEST will make reasonable efforts to seek multiple sponsors for sponsored programs or activities.

4.4 CHEST will not place the names or logos of commercial entities or products on CHEST distributed, non-educational "reminder" items (e.g., tote bags, lanyards, highlighters, notebooks, and luggage tags) that commercial entities are not permitted to give directly to healthcare professionals under generally accepted standards for ethical interactions (i.e., PhRMA Code, AdvaMed Code).

4.5 CHEST may develop industry-facing training programs designed to provide commercial entities' sales team with in-depth clinical information to enable fact-based communication with physicians and other health care professionals. Such programs must be unbranded, disease state-specific, evidence-based, and may be customized to address the therapeutic focus and business objectives of the client.

4.6 CHEST may develop clinician-facing reality-based training, simulation, and gamification technology that requires use of specific commercial products and requires advice and direction of commercial organizations to develop. CHEST may solicit commercial funding or in-kind contributions for such training provided that CHEST retains editorial control of the content.

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4.7 CHEST may develop statistical and analytical products that incorporate data from commercial entities and are designed to provide those entities with market and customer insights.

5. Educational Grants and CHEST CME

5.1 CHEST complies with ACCME Standards for Commercial Support, including having adopted policies and procedures designed to identify and manage conflicts of interest in CHEST CME programs.

5.2 CHEST will retain control over the use of educational grants and implement safeguards designed to ensure that educational programs are non-promotional and free from commercial influence and bias.

5.3 CHEST appoints its own planning committees to select the objectives, content, faculty, and format of educational activities in a manner that is consistent with its objectives and mission.

5.4 CHEST will not solicit suggestions from commercial entities about program topics, speakers, or content.

5.5 CHEST will prohibit presenters at its CME program from using presentation materials prepared or controlled by commercial entities and from using slides with logos of commercial entities.

5.6 CHEST will require presenters in CHEST CME programs to give a balanced view of therapeutic options, and will require presenters to use generic names in place of product trade names.

5.7 CHEST will make reasonable efforts to achieve a balanced portfolio of support for each CHEST CME program.

6. Non-CME Informational/Educational Programs

6.1 CHEST will require Non-CME Informational/Educational Programs to be clearly distinguished from CHEST CME.

7. Exhibits

7.1 CHEST has adopted written policies governing the nature of exhibits by commercial entities and the conduct of exhibitors, including requiring exhibitors to comply with applicable laws, regulations, and guidance.

7.2 All giveaways by commercial exhibitors of health care products or services must be consistent with the PhRMA Code on Interactions with Healthcare Professionals, the AdvaMed Code of Ethics on Interactions with Health Care Professionals, the MedTech Europe Code of Ethical Business Practice [for meetings in Europe], and the Standards for Commercial Support of the ACCME, and must be educational and modest in value.

7.3 CHEST will make reasonable efforts to place exhibit booths out of attendees obligate path to CHEST CME sessions.

8. Clinical Practice Guidelines

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8.1 CHEST will base its Clinical Practice Guidelines on scientific evidence and follow a standardized, evidence-based guideline development process.

8.2 CHEST will follow a transparent Guideline development process that is not subject to the influence of commercial entities.

8.3 CHEST will not permit direct commercial entity support for the development of Clinical Practice Guidelines or Guideline Updates, or for their initial printing, publication, and distribution. It is permissible to accept commercial support for subsequent distribution, translation, repurposing, or activities designed to improve the implementation of and adherence to its Guidelines.

8.4 CHEST requires all potential guideline development panel members to disclose relevant relationships prior to appointment to a panel, and to update their disclosure throughout the Guideline development process. Contractors are subject to the same disclosure requirements.

8.5 CHEST has developed procedures for determining whether financial or other relationships between Guideline development panel members and commercial entities constitute conflicts of interest relevant to the subject matter of the Guideline, as well as management strategies that minimize the risk of actual and perceived bias if panel members do have conflicts.

8.6 CHEST requires the panel chair (or at least one chair if there are co-chairs) be free of conflicts of interest.

8.7 CHEST requires that Guideline recommendations be subject to multiple levels of review, including rigorous peer-review by a range of experts. CHEST will not select as reviewers individuals employed by or engaged to represent a commercial entity.

8.8 CHEST's Guideline recommendations are reviewed and approved before submission for publication beyond the guideline development panel by the Guidelines Oversight Committee.

8.9 Guideline manuscripts will be subject to independent editorial review by the *CHEST* journal or other publication where they are first published.

8.10 CHEST will publish Guideline development panel members' disclosure information with each Guideline.

8.11 CHEST will require Guideline contributors to disclose financial or other substantive relationships that may constitute conflicts of interest.

8.12 CHEST will recommend that Guideline development panel members decline offers from affected Companies to speak about the Guideline on behalf of the Company for a period of one year after publication of the Guideline.

8.13 CHEST will not accept unpublished data from commercial entities, and will not permit commercial entities to review Guidelines in draft form.

9. *CHEST* journal

9.1 *CHEST* journal will maintain editorial independence from CHEST management and advertisers.

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9.2 *CHEST* requires all authors to disclose financial and other relationships with commercial entities.

9.3 *CHEST* requires editors and reviewers to disclose financial and other relationships with commercial entities

9.4 The Editor in Chief of *CHEST* will have the ultimate responsibility for determining when a conflict of interest should disqualify an editor or reviewer from reviewing a manuscript, according to established policies.

9.5 *CHEST* has adopted policies prohibiting the submission of “ghost-written” manuscripts prepared by or on behalf of commercial entities.

10. Standards for Advertising

10.1 *CHEST* will adopt written policies that set standards for acceptance of Advertising in its various publications and websites.

11. Standards for Licensing

11.1 *CHEST* in entering into licensing agreements will include provisions preventing the misuse, unintended use, and modification of licensed materials, prohibit modification of licensed materials in a way that would change their meaning, and where, appropriate, prohibit use of *CHEST* trademarks by a licensee to imply *CHEST* endorsement of products or services of commercial entities.