

American Psychiatric Association
FINANCIAL STATEMENT, DISCLOSURE OF AFFILIATIONS AND CONFLICT OF INTEREST POLICY
Approved by the Board of Trustees March 20, 2016

The American Psychiatric Association (APA) has adopted the following policy regarding financial statement, disclosure of affiliations and conflict of interest. These procedures will be followed to ensure the integrity of the APA's policies, positions, publications and other services.

1. The APA encourages participation of all members and requested outside experts in its activities.
2. The APA believes that **maximum transparency** regarding participants' affiliations and interests is in the best interest of the Association and the profession.
3. If an identified affiliation or interest creates an apparent or potential conflict within the guidelines presented below, an individual may still be able to participate in the activities of a committee, work group, component or other APA entity as long as the affiliation or interest is **fully** disclosed to the members of that APA entity and the Association. **When an interest or affiliation may present a conflict of interest, the individual will be expected to recuse him/herself from the relevant discussion and any vote which results from the discussion.**
4. Oral disclosure of interests is required of all participants before all meetings. This includes, but is not limited to: the Trustees of the c6 and c3 Boards, the Assembly, Councils, Committees, Task Forces, and work groups. Oral disclosure should also occur at all meetings if any new activity presents potentially competing interests that might conceivably affect the work to be undertaken by those gathered. Written disclosure forms are available upon request to the chairperson of each entity prior to each meeting.
5. Participants in APA activities are required to disclose interests and affiliations related to the field of psychiatry for the last three calendar years and the current year on an annual basis (January 1st to December 31st) for the tenure of participation. This includes candidates for national office whose disclosure forms should be made available to the Nominating Committee.
6. Participants will be required to disclose all forms of **financial support, commercial involvements, or other financial involvements related to the field of psychiatry whether or not the participant thinks that the involvement represents a conflict of interest.** This includes, but is not limited to, primary source of income and/or employment, institutional or corporate affiliations, pharmaceutical or device company support, paid consultancies, stock ownership or other equity interests (including exchange-traded funds geared specifically to pharmaceutical or medical device companies), patent ownership, research support, advisory committee membership, publication or other royalties, speaking or writing honoraria, expert testimony, funds for travel, interest in patents, instruments and measurement scales, technologies (including software companies), and individual or group incorporated or unincorporated private practice sources.
7. Participants will also be required to disclose **uncompensated affiliations** related to the field of psychiatry. These will include, but not be limited to, positions of influence (i.e., Trustees, Board_Member) in non-profit, professional or consumer advocacy organizations and for-profit industry.
8. Participants will be required to disclose such affiliations for immediate family members who are defined as a spouse/significant other or dependent children.
9. Except as otherwise provided for in APA policies or mandated by law, the financial information (i.e., dollar amounts) set forth in the Disclosure Form (and in any subsequent oral or written disclosures, modifications or supplements hereto) is submitted to APA on a confidential basis and solely for the purposes stated herein. The financial (i.e. dollar amounts) information in the disclosures will be maintained by APA as proprietary and confidential. The APA will limit disclosure of the information to those who need it and will not disclose it or provide it to any other person or entity without the prior written consent of the disclosing party or action by the APA Board of Trustees authorizing such disclosure. Notwithstanding the foregoing, the disclosing party acknowledges and agrees that neither

APA nor any of its affiliates will have any liability arising from any disclosure or use of the information in the Disclosure Statement as contemplated herein or any inadvertent disclosure thereof.

10. The APA has three (3) tiers of disclosure.

Tier #1: During tenure of participation, participants and their spouses are required to limit direct compensation to no more than \$5,000 in total annually from pharmaceutical companies/device makers/biotechnology companies and similar industry entities (“industry sources”) for direct services such as consultancies, advisory committee positions, forensic assistance, speakers’ bureau services, etc. (This does not include indirect donations to clinical practices, hospitals, nonprofit organizations, managed care organizations, university-based lectures, industry-sponsored research support, and similar activities).

Neither participants nor their spouses should hold stock or shares worth more than \$50,000 in the aggregate in or received more than \$10,000 annually in the aggregate in dividends from such industry sources. Stock in shares held in mutual funds, pension or retirement funds, blind trusts and similar arrangements over which participant and their spouses do not exercise direct control do not count toward these limits

Absent approval from the Board of Trustees, participants at this level should be willing to divest themselves of any ownership or interest in or compensation from these industry sources above the limits set forth for the period of their appointment to the APA groups noted below. Full disclosure is required from the time of appointment or election forward. (N.B. All new appointments/ reappointments after March 14, 2015 must conform to the \$5,000 threshold. Prior appointments shall be exempt from the new limits until the next annual disclosure date.)

The majority (fifty-one percent or more) of a Group in Tier #1 must comprise individuals who have no conflicts of interest.

If a potential appointee fails to meet a BOT guideline for service on the Committees in Tier #1, thus creating the presumption that she/he will not be appointed, the BOT may approve the appointment notwithstanding if there are compelling reasons for it, including e.g., the inability to locate critical expertise elsewhere. The reasons must be provided by the person seeking the appointment to the BOT in writing and the recommendation to appoint the individual should include specific methods to manage the conflict of interest in order to protect the integrity of the products produced and of the APA.

Tier #1 includes:

- DSM Steering and Review Committee members; Practice Guideline Executive and Steering Committees; Chairpersons and Vice-Chairpersons of the Practice Guideline Workgroups.
- The Chairpersons or Co-chairpersons of the DSM groups and Practice Guidelines groups should ideally not have any conflict of interests.

Tier #2: Full disclosure is required from the time of appointment, election, or publication forward from:

- Board of Trustees, Editors of American Psychiatric Publishing (APP) and American Psychiatric Association Foundation (APAF); and candidates for national office; Authors of books published by APP, APA sponsored meetings presenters, Assembly members, Assembly Executive Committee, APA Components (Councils, Committees, Task Forces, Work Groups) DSM advisors, Practice Guideline Work Group members, and Practice Guidelines consultants.

Tier #3: Full disclosure is required from Employees at the time of hiring. Oversight of the process is provided by relevant executive level staff for the APA, including any additional disclosures, limits or publication of the disclosure information.

11. If it is determined that an individual in Tiers #1 or #2 has failed to disclose an interest or has misrepresented an interest on their disclosure form, the matter will be reviewed by Conflict of Interest Committee which will forward recommendations for appropriate action to the Board of Trustees.
12. Participants are required to update their disclosure of affiliations and interests form annually (see #5 above). However, if any affiliation or interest exceeds the \$5,000 limit set for Tier #1 prior to annual revision of the disclosure form, this should be reported immediately.