



Conflict of Interest Policy

The Renal Physicians Association (RPA) believes that members of its Board of Directors and others in positions of leadership have a responsibility to carry out the Association's business for the benefit of the Association. The RPA is a professional individual membership association, and as such recognizes that many of its members will have relationships with other entities, including pharmaceutical and device manufacturers, dialysis facility owners and other organizations. Leaders of the RPA must ensure that when they consider any specific issue on behalf of the Association, they do not have a substantial conflict of interest. We therefore establish this policy and procedures to manage conflicts of interest.

Definition

RPA considers a serious potential conflict of interest to exist when a Board member or association leader has a relationship with, or engages in any activity, or has a personal financial interest or consulting relationship that creates a risk such that the professional judgment or actions of a Board member or association leader regarding the RPA's mission and core values may be unduly and inappropriately influenced.

In a practical sense, a serious perceived conflict of interest is generally defined as that level of involvement with outside relationships or interests which may cause embarrassment or lead to questions concerning the Board member's motives with regard to RPA business.

General Principles

1. Disclosure
 - a. The RPA will develop and maintain processes that document, review and track potential conflicts of interest for its Board of Directors and other leaders.
 - b. A Conflict of Interest Form will be executed by July 1st each year by each member of the Board of Directors and Chairs of Standing Committees
 - c. The disclosure statement will name all leadership positions in dialysis organizations, industry, sponsored research and other medical or professional organizations.
 - d. The disclosure will include all financial relationships with these organizations, direct or indirect for the individual or his/her spouse including salaries, royalties, consultancies, speaker's bureaus, honoraria, income-generating relationships with health care facilities or other funding sources. Holdings in retirement funds or mutual funds will not be reported. The fee for Medical Directorship(s) of Dialysis Facilities is also excluded. Three categories of financial disclosure will be requested:
 - i. Less than \$10,000/year
 - ii. \$10,000 - \$50,000/year
 - iii. Greater than \$50,000/year

- e. Ownership positions, stock holdings, or partnerships in organizations doing business in renal medicine will be disclosed when such positions exceed \$50,000 in value.
 - f. Members of the RPA Board of Directors will recuse themselves from discussion and voting when conflicts of interest or the appearance of conflicts of interest are present. In cases where there is uncertainty regarding conflict of interest, the Board of Directors will determine the need for a member’s recusal. Minutes of all meetings will list all recusals.
2. Transparency and Standardization
- a. A uniform policy on potential bias and conflicts of interest will be reviewed biannually.
 - b. A Potential Conflict of Interest Form will be executed by July 1st each year by all members of the RPA Board of Director and standing committee chairs.
 - c. All Potential Conflicts of Interest Forms will be made available to all members of the Association upon request.
 - d. All potential conflicts of interest will be published on the RPA website.
3. Evaluation
- a. A Conflict of Interest Committee will be established to regularly review the Association’s Conflict of Interest policies and procedures, and to make recommendations to the Board of Directors to maximize its effectiveness.
 - b. This committee will review the Potential Conflict of Interest forms each year, and will make recommendations to the Board of Directors concerning any actions needed to maintain the integrity of the Association.
 - c. A document outlining the principles this committee will follow will be prepared and reviewed biannually.
 - d. Any concerns brought before the Association concerning Conflict of Interest will be considered by this committee, whose recommendations will be reported to the Board of Directors.

Guiding Examples

The examples below illustrate potential situations that may be presented to the Conflict of Interest Committee for consideration. They are intended to help guide decisions; however, all situations cannot be predicted and each situation will need to take into account the unique circumstances it presents. In this chart, “A” means acceptable with disclosure, “M” means may be acceptable with disclosure if committee approves. “HLS”, High Level of Scrutiny, means that it is highly unlikely that the candidate will be acceptable. “U” means unacceptable, unless the committee determines that overwhelming factors are present to outweigh the inherent conflict of interest.

Situation	Committee Chair	Board Member	Officer
Full-time employee, officer or Board of Director Member of Dialysis Company	M	M	U
Board member of			

renal-related national organization	M	M	HLS
Committee chair of renal-related national organization	M	M	M
Full-time employee, officer or Board of Director Member of Pharma Company or Device Manufacturer	M	U	U
Consultant to Dialysis Company	A	A	M
Consultant to Pharma Company or Device Manufacturer	A	A	M
Substantial Ownership Position of a Dialysis Facility Or Facilities	A	M	M



CERTIFICATION OF FULL DISCLOSURE

In order for the members of the Renal Physicians Association (RPA) Board of Directors to be fully informed during the conduct of the Association's business, any and all actual and potential conflicts of interest are required to be disclosed by each elected and appointed member of the RPA Board of Directors on no less than an annual basis by July 1st of each year. Such conflicts of interest must be disclosed to ensure that each member of the RPA Board of Directors has the opportunity to formulate his/her individual opinions about the issues being addressed by the Board with knowledge of any Board member's involvement with the issue. The intent of this policy is to fully disclose information, not to limit a Board member's participation or credibility through disclosure.

You are required to sign and return this form annually during your tenure on the RPA Board of Directors.

1. I and/or my spouse **do not have** a conflict of interest with regard to my service as an elected or appointed member of the Renal Physicians Association Board of Directors.

Board Member's Signature
Printed Name
Date Signed

2. I and/or my spouse **have** a potential conflict of interest with regard to my service as an elected or appointed member of the Renal Physicians Association Board of Directors, as indicated below. Details are to include ranges of dollar amounts where appropriate as follows. (A. Less than \$10,000 per year; B. \$10,000--\$50,000 per year; C. Greater than \$50,000 per year)

<u>Area</u>	<u>Please Check</u>	<u>Provide Details</u>
Board positions in renal-related nat'l organizations	<input type="checkbox"/>	
Chair of committee in renal-related nat'l org.	<input type="checkbox"/>	
Employee of dialysis company, pharma company, or device manufacturer	<input type="checkbox"/>	
Research or grant support	<input type="checkbox"/>	
Consulting arrangement	<input type="checkbox"/>	
Speakers' Bureau/Honorarium	<input type="checkbox"/>	
Income-generating relationships with health care facilities; income transcends practice	<input type="checkbox"/>	
Corporation stock holdings; partnerships	<input type="checkbox"/>	
Other (specify)_____	<input type="checkbox"/>	

Board Member's Signature
Printed Name
Date Signed

Please return the ORIGINAL of this form to:

RPA 1700 Rockville Pike, Suite 220 Rockville, MD 20852
(800) RPA-7525 (301) 468-3515 FAX (301) 468-3511