



ENTITY	NUMBER
American Heart Association	
MANUAL	EFFECTIVE DATE
Policy and Procedure – Scientific Publishing	10/03
SUBJECT	REVISED
Disclosure – Conflict of Interest	10/2004; 5/2005; Reviewed 8/2009; Revised 03/2011, 04/2011, 10/2011, 11/2011

1.0 PURPOSE

In accordance with the American Heart Association’s (AHA) Conflict of Interest (COI) Standards (Appendix I), the Scientific Publishing Policy on Disclosure – Conflict of Interest exists to provide guidance for editors, authors, reviewers, and editorial staff of the requirement to disclose specific information in carrying out work involved in the submission, review, selection, and publication of articles in AHA scientific journals, both print and online.

2.0 REQUIREMENTS

- 2.1 All AHA journals shall use the same requirements and procedures with regard to COI disclosure for authors, reviewers, editors, and editorial boards. The language pertaining to these requirements shall be the same across the journals in the appropriate written instructions, letters, online instructions, etc.
- 2.2 With the implementation of a new online manuscript submission and peer review system in 2003, links detailing the full AHA COI Policy and Standards were made available to the authors, editors, and reviewers using the system.
- 2.3 **For Editors:**
 - 2.3.1 During the selection of an Editor or Editor-in-Chief, the AHA advises candidates that they must comply with AHA COI Standards requirements, including submission of a current COI Disclosure Questionnaire and Addendum for Editors and review by the Conflict of Interest Review Committee, before being appointed as journal editors. By virtue of their positions, journal editors must be especially sensitive to the issue of actual or perceived COI and must be especially rigorous in acting to avoid them. In addition, the Conflict of Interest Review Committee has codified 3 principles to resolve Conflict of Interest for Journal Editors into an operational policy (Appendix II).
 - 2.3.2 All Editors and Associate Editors are required to complete the annual AHA COI Disclosure Questionnaire including the Addendum for Editors. During staff review of these forms, any declared conflicts of significance by Associate Editors are brought to the attention of the Senior Editor. Disclosures by Editors or Associates Editors are retained on file at AHA,

updated annually, and are not publicly disclosed. For the purposes of the next sections, Consulting or Guest Editors are defined as individuals who have independent decision-making authority for a manuscript, are not contracted as Associate Editors, and have no actual or perceived COI with manuscripts they are handling. Collaborators are defined as any colleague, scientific mentor, or student with whom the Editor is currently conducting research or other significant professional activities.

- 2.3.3 To avoid actual or perceived COI:
- 2.3.3.1 Original research manuscripts authored or coauthored by the Editor (in Chief) and/or any of the Associate Editors are handled by a Consulting Editor who makes all decisions about the manuscript (including choice of referees and ultimate acceptance or rejection). The entire process is handled confidentially.
 - 2.3.3.2 All manuscripts submitted from the Editor's home institution are also handled by a Consulting Editor. Manuscripts from an Associate Editor's institution can be handled by the Editor or another Associate Editor as long as those individuals are not from the same institution.
 - 2.3.3.3 Original research manuscripts authored or coauthored by a collaborator who has published with the Editor-in-Chief within 3 years at time of submission will be handled by a Consulting or Guest Editor. Original research manuscripts authored or coauthored by a collaborator who has published with an Associate Editor within 3 years at time of submission cannot be handled by that Associate Editor. Coauthors on government or society-initiated guidelines and scientific statements will not, for the purpose of this policy, be considered collaborators.
 - 2.3.3.4 The Editor (in Chief) and/or Associate Editors may additionally, from time to time, refer a manuscript to a Consulting Editor to avoid a real or reasonably perceived COI.
 - 2.3.3.5 In all such cases, the Consulting Editor shall make all decisions about the manuscript (including choice of referees and ultimate acceptance or rejection). The entire process is handled confidentially.

Example Scenarios:

- A)** Editor-in-Chief is from institution Alpha. Original research manuscript is submitted and one of the manuscript authors is from institution Alpha.

Manuscript should be handled by a Consulting Editor from a different institution. Handling Editor should make all decisions (see 2.3.3.5).

- B)** Editor-in-Chief was an author on an ACCF/AHA guideline. A coauthor from that guideline submits an original research

manuscript to the journal. The Editor-in-Chief and author have not jointly worked together on anything else in the past 3 years.

This is not considered a conflict for the purposes of this policy and the Editor-in-Chief can handle this manuscript. The Handling Editor should make all decisions (see 2.3.3.5).

- C)** A collaborator of an Associate Editor submits an original research manuscript to the journal. This author and the Associate Editor published a study together 2 years ago.

The Editor-in-Chief or another Associate Editor, who are not collaborators with the author, must handle this manuscript. The Handling Editor should make all decisions (see 2.3.3.5).

- D)** An Associate Editor is at institution Beta. An author from institution Beta submits an original research manuscript.

An Associate Editor (or the Editor-in-Chief) from a different institution must handle the manuscript. The Handling Editor should make all decisions (see 2.3.3.5).

- E)** An Editor-in-Chief or Associate Editor sits on a project steering committee. A project collaborator who has not published with the Editor-in-Chief or Associate Editor submits a manuscript.

A nonconflicted Associate Editor or Guest Editor should make all decisions (see 2.3.3.5).

- F)** A Section Editor with decision-making authority or a Statistical Consultant who is listed on the masthead, but who is not at the same institution as the Editor-in-Chief, submits a manuscript.

The manuscript should be handled by a Guest Editor (see 2.3.3.5).

- G)** A submitted manuscript includes individuals who have collaborated with an Associate Editor, Section Editor, International Editor, or Statistical Consultant.

An Associate Editor without a conflict (or the Editor-in-Chief) can handle this manuscript and make all decisions (see 2.3.3.5).

2.4 For Authors:

- 2.4.1 An Authorship Responsibility and Copyright Transfer Agreement form must be completed by **all authors**. All authors must also complete and sign the COI Disclosure Questionnaire.

Each author is required to identify all relationships within the past 2 years that are **relevant** to the topic of the manuscript and might be perceived as a real or potential COI. A relationship is "**relevant**" if the relationship or interest relates to the topic in terms of any of the following: the same or

similar subject matter or topic; the same, similar or competing drug or device, product or service, intellectual property or asset; a drug or device company or its competitor; or has the reasonable potential to result in financial, professional or other personal gain or loss for you, members of your household or employer.

Each author is required to classify each disclosed relationship as either "Significant" or "Modest". A relationship is considered to be "Significant" if (a) the person receives \$10,000 or more during any 12-month period, or 5% or more of the person's gross income; or (b) the person owns 5% or more of the voting stock or share of the entity, or owns \$10,000 or more of the fair market value of the entity. A relationship is considered to be "Modest" if it is less than "Significant" under the preceding definition.

If an author has no conflicts to declare, they must indicate **None**.

- 2.4.2 Additionally, authors **must** disclose any and all relationships that could be perceived as real or apparent COIs after the Acknowledgments section. COI disclosures will be published in the Disclosures section, which appears after the Acknowledgments section, in the accepted article.
 - 2.4.3 The Acknowledgments section in the accepted article recognizes the substantive contributions of individuals:
 - 2.4.3.1 Authors **must** provide written permission/approval from all individuals mentioned by name in the Acknowledgments section of the manuscript.
 - 2.4.3.2 Authors **must** completely spell out all grant funding agency abbreviations, with the exception of National Institutes of Health.
 - 2.4.4 The Sources of Funding section in the accepted article recognizes all sources of research support (including commercial or institutional support).
- 2.5 For Reviewers:**
- 2.5.1 AHA journals shall require a COI disclosure from potential reviewers of any manuscripts. This requirement will be incorporated into the language and procedures of the online manuscript submission and peer review system used by all of the journals. As well, a link to the full details of the AHA policies and standards will be available from the online manuscript submission and peer review system. A standard statement is as follows:
 - 2.5.1.1 Please advise the editorial office in your reply of any relevant relationship that might be reasonably perceived as a real or potential conflict of interest that could potentially influence or bias your review of this manuscript. While most relationships are not disqualifying, if you believe that you have a disqualifying conflict of interest, financial or otherwise, please contact the editorial office immediately. A relationship is "relevant" if the relationship or interest relates to the topic of the manuscript in terms of any of the following: the same or

Policy and Procedure Manual

similar subject matter or topic; the same, similar or competing drug or device, product or service, intellectual property or asset; a drug or device company or its competitor; or has the reasonable potential to result in financial, professional or other personal gain or loss for you, members of your household or employer.

APPROVALS:

SPC COI Subcommittee: 10/03

Scientific Publishing Committee: 10/03, 11/11

**Appendix I:
AMERICAN HEART ASSOCIATION
CONFLICT OF INTEREST
STANDARDS**

I. PURPOSE:

The purpose of these standards is to protect the integrity of AHA's decision-making processes, the public's confidence in AHA, and the image of AHA. Importantly, these standards also are intended to protect the reputation and honor of AHA's volunteers and staff.

It is acknowledged and desired that volunteers have myriad relationships, interests, and memberships. These conflict of interest standards serve to provide guidelines to volunteers in areas or in situations that potentially may affect or compromise the integrity and independence of AHA's decision-making processes, confidence in AHA or AHA's reputation. Such situations frequently also are sensitive or uncomfortable for the individuals involved.

The volunteers and staff are persons of honesty and integrity and do not need to be provided by AHA with a code of ethics. However, there is value in providing guidelines as a tool to understand AHA's conflict of interest policy, recognize situations potentially posing a conflict of interest, take appropriate remedial action, and otherwise cope with complex relationships.

As guidelines, these standards are not to be considered as complete or exclusive. They are supplements to good judgment. They may be elaborated upon or applied in specific additional situations not particularized herein.

II. STANDARD:

The standard of behavior is that all volunteers shall scrupulously avoid any conflict of interest between the volunteer's personal, professional and business interests, and the interests of AHA.

That includes scrupulously avoiding actual conflicts of interest and, also, perceptions of conflicts of interest.

That includes avoiding actual unfair benefits and, also, opportunities for benefit or gain.

That includes avoiding conflicts, benefits, gains, or undue influence for the volunteer's personal or professional benefit and, also, for the benefit of the volunteer's family--whether or not in the household--employer, and close friends and business associates.

That includes avoiding a gain to the volunteer and others and, also, a detriment or harm to AHA.

What is required is meticulous adherence to and rigorous compliance with both the letter and the spirit of the conflict of interest policy and standards. The volunteer is to act for and in the best interests of AHA, independent and impartial from external or personal interests and considerations.

Policy and Procedure Manual

III. DISCLOSURE:

Upon or before election or appointment, the volunteer is to make a full and complete written disclosure of interests, memberships, relationships, arrangements, investments and holdings that potentially could result in a conflict between the volunteer's personal, professional or business interests--or those of the volunteer's immediate family or employer--and the interests of AHA.

This written disclosure is to be updated by the volunteer whenever any material changes occur in the volunteer's situation. In any event, the disclosure questionnaire is to be completed annually during the term of a volunteer's active service unless otherwise material changes are made within the term.

In the course of AHA meetings or activities, the volunteer is to disclose any direct or indirect interests in a transaction or decision that potentially could be a conflict of interest; e.g., whenever the volunteer, family, employer or close associates will receive a benefit or gain, or an opportunity or potential for benefit arises, or an opportunity for unfair influence arises, or an opportunity for detriment or harm to AHA or for benefit or gain to a third party at AHA's expense arises.

Failure to submit a written disclosure results in disqualification of a volunteer from service on an AHA board, committee, task force, writing group or other group; from service in an AHA office or position; or from publication or presentation at an AHA conference. For a staff person, failure to submit a written disclosure results in disqualification from AHA employment. A reasonably credible allegation that a person has not made a full or correct disclosure will be investigated under the oversight of the AHA General Counsel and appropriate remedies or sanctions taken.

Volunteers should err on the side of prudence, and declare an actual or potential conflict if in doubt as to a relationship or interest. This will prevent tainting the decision, and the reputation and integrity of AHA and its volunteers.

IV. ABSTENTION:

Once a disclosure has been made, the volunteer shall refrain from any discussion of the transaction or decision in the particular committee, group, or task force. Further, the volunteer shall physically leave the meeting for the duration of that discussion. Of course, the volunteer is to abstain from voting on the issue. Such abstention from discussion and voting is to be documented appropriately.

Besides abstention from discussion at the meeting, the volunteer shall refrain from discussing the issue or otherwise appearing to influence the outcome with other volunteers, committees or groups, or with staff.

The objective is that the interested volunteer shall have abstained from discussion, voting, and any other aspect of influencing or participating in the decision-making process.

Policy and Procedure Manual

V. IMPLICATIONS:

A volunteer with potential conflicts of interest generally is not barred from membership on committees, participation in activities, or service in an office of AHA. An interested volunteer is barred from the decision-making process and related discussions, and must leave the meeting.

A volunteer's employer generally is not automatically barred from any financial transactions or business dealings with AHA. An interested volunteer must disclose the direct or indirect interest, abstain from all related discussions, actions to influence, and voting. In some cases, it may be necessary or desirable to bar a particular transaction with the volunteer's employer or interested party to safeguard against an actual or perceived conflict and thereby protect the integrity of AHA and the volunteer. (See section IX. Officers and Journal Editors and section X. Officers and Budget/Audit Committee Members hereinbelow for specific exceptions requiring a bar against transactions with volunteers' employers.)

A volunteer's investments or holdings generally do not automatically need to be divested or placed in a blind trust agreement. Divestiture, a blind trust or similar arrangement--or, alternately, a volunteer's ineligibility for or declination of a position, editorship, assignment, or office--in some cases may be necessary or desirable as the only reasonably appropriate or available remedy in a particular situation to safeguard against an actual or perceived conflict and thereby protect the integrity of AHA and the volunteer. (See section IX. Officers and Journal Editors hereinbelow for specific exceptions requiring divestiture, a blind trust or similar arrangement.)

A volunteer may not in every case always be able to completely avoid the perception of a conflict of interest, undue influence or unfair benefit. A volunteer must act prudently in every case to avoid actual conflicts of interest, undue influence or unfair benefit, and also to make every reasonable effort to avoid a perception thereof. To accomplish this, a volunteer will exercise good judgment, and act reasonably and prudently. Further, the volunteer will provide timely, full and complete disclosure of actual or potential conflicts, abstain from discussion, influencing activities and voting, and provide adequate supporting documentation as necessary.

VI. GIFTS & HONORARIA:

Volunteers while acting in the capacity of an AHA representative or volunteer shall not solicit or accept for their personal, professional or business gain gifts, gratuities, honoraria, entertainment, favors or other goods or services from current or prospective vendors, providers of services, corporate partners, or competitors of AHA.

This does not prohibit volunteers in their personal or professional capacity, or their employers, from having relationships with the same organizations or persons who are current or prospective vendors, providers of services, corporate partners, or competitors of AHA. In such instances, the volunteer shall take all prudent and reasonable measures to distinguish actions and decisions made personally, professionally, or business-wise from the volunteer's relationship to or position in AHA. In such instances, the volunteer when acting in the capacity of an AHA volunteer, shall make full and complete disclosure and abstention, and otherwise comply with these standards.

This does not prohibit the acceptance of travel costs, meals or other expenses normally paid for by AHA that are related to the conduct of AHA business or activities from being paid by the

Policy and Procedure Manual

current or prospective vendors, providers of services, corporate partners or competitors of AHA. This does not prohibit the acceptance of gifts or tokens of nominal or insignificant value that may be customarily given in the course of proper business conduct, such as pens, mugs, calendars, paperweights, and items of food or clothing. Good judgment must be used to avoid actual or perceived conflicts of interest or undue influence when acting on behalf of AHA.

VII. SELF-DEALING TRANSACTIONS:

While a volunteer or a volunteer's employer generally is not automatically prohibited from financial transactions or business dealings with AHA, volunteers are to scrupulously avoid actual or perceived conflicts of interest, unfair benefit, personal gain, or undue influence in dealings or transactions with AHA. As a general matter, a volunteer or volunteer's employer may engage in dealings with AHA if the volunteer does not participate in the discussion or voting or otherwise participate in the decision-making or selection process, and the selection is an open, competitive process or through peer review.

In some instances, it may be necessary or reasonable to bar a particular transaction with a volunteer, volunteer's employer or business associates to safeguard against reasonable perceptions of conflict of interest. (See sections IX and X hereinbelow for specific exceptions requiring a bar of transactions with a volunteer's employer.)

VIII. OVERLAPPING MEMBERSHIPS:

Memberships of its volunteers in other organizations or groups is one attribute of value to AHA. Such memberships, liaisons, relationships or interests that could pose a potential conflict of interest, of course, are to be fully disclosed by the volunteer.

When a volunteer is a director, committee member, or other active participant in another organization, the volunteer will not disclose or use confidential or proprietary information of AHA or otherwise make disclosures that could be injurious or disadvantageous to AHA.

In some relatively few instances, though, being a director or member of another group may be incompatible with being an AHA officer or journal editor. This is more likely to occur when there exists fundamentally opposing positions or purposes between AHA and the other organization, or when there is an inherent conflict of interest, such as between being an AHA journal editor while having substantial ties to a pharmaceutical or biomedical device manufacturer in a field related to the journal's topic.

IX. OFFICERS AND JOURNAL EDITORS:

Individuals are to be advised of and are to comply with AHA conflict of interest policy requirements, including full and complete disclosure, before being appointed or elected as officers or journal editors. By virtue of their positions, officers and journal editors must be especially sensitive to the issue of actual or perceived conflicts of interest and must be especially rigorous in acting to avoid them.

Therefore, journal editors and officers shall not have significant relationships that result in actual or reasonably perceived conflicts of interest. The conflict of interest review committee (see

Policy and Procedure Manual

sections XI and XII hereinbelow) shall make a determination whether significant potential for conflict of interest exists and, if so, recommend an appropriate remedy. The review committee will make a determination on the basis of the substantiality--i.e., number, frequency, duration, amount, relatedness to AHA responsibilities, etc.--of such relationships, and whether they in their entirety result in an actual or reasonably perceived conflict of interest.

Journal editors shall not during their terms have significant relationships to pharmaceutical companies, biomedical companies or biomedical device manufacturers, or other corporations, including their subsidiaries or components, whose products or services are reasonably directly related to the topic area or field of the journal. Disqualifying significant relationships could include, but not be limited to: significant or multiple honoraria or fees, consultancies, board or advisory council memberships, or employment; holding significant stock or other forms of investment or ownership; otherwise being associated with the company or its products; or serving as editor, co-editor, or associate editor to another journal with an overlapping topic, or in a position having responsibility for acceptance of papers for publication and/or responsibility for policy decisions for that journal.

Should the prospective journal editor have significant stock, investments or other holdings in a pharmaceutical company, biomedical company or biomedical device manufacturer, or other corporation whose products or services are reasonably directly related to the journal's topic, then divestiture, a blind trust or similar arrangement, removal from the review of articles related to stipulated topics, or other appropriate remedy in the determination of the review committee will be required before the individual is appointed as journal editor.

Should the prospective journal editor have other potentially disqualifying significant relationships, an appropriate remedy will be required before the individual is appointed as journal editor. Employment by a pharmaceutical company, biomedical company, biomedical device manufacturer, or other corporation whose products or services are reasonably directly related to the journal's topic is deemed to be a conflict of interest.

X. OFFICERS AND BUDGET/AUDIT COMMITTEE MEMBERS

By virtue of their positions, officers and members of budget and finance committees, audit committees, investment committees, and similar committees having financial responsibilities must be especially sensitive to the issue of actual or perceived conflicts of interest, and must be especially rigorous in acting to avoid them.

During their terms, officers' and budget/audit committee members' employers are barred from financial transactions or business dealings with AHA when the specific decision or recommendation on that particular transaction is recommended or approved by the officers or by the budget/audit committees. To do otherwise would result in a virtually irrebuttable perceived conflict of interest.

This is a narrowly drawn requirement prohibiting dealings with officers' and budget/audit committee members' employers during their terms only in commercial, business or financial transactions decided by the officers or budget/audit committees. As an example, if an officer's or budget/audit committee member's employer were an accounting firm, bank, law firm, investment manager, insurance broker or carrier, real estate developer or builder, that employer would be barred from being retained for a fee to provide accounting, auditing, legal, investment,

Policy and Procedure Manual

insurance, real estate, or construction services--services that are decided specifically by the officers or budget/audit committees.

If an officer's or budget/audit committee member's employer provided goods or services of a nature whereby the transaction is not specifically recommended or approved by the officers or budget/audit committee, then there is not a prohibition. As examples, those employers would not be barred from business or financial transactions such as participation in a corporate promotion approved by a development committee, or a public education program delivery arrangement approved by an education/program committee, or a media materials production agreement approved by a communications committee, or an office supply or computer software sales agreement approved by a staff group. In each of these examples, the officers or budget/audit committee members must not have participated in or influenced the decision-making process which, itself, must have been an open, competitive process.

Regarding research grants and awards particularly, the employing institutions of officers and budget/audit committee members are not barred from receiving AHA research grants and awards. This presumes that the grant/award was selected for funding through the customary AHA peer review process, in full compliance with the peer review conflict of interest provisions, and that the interested officers or budget/audit committee members did not participate in the peer review process.

(In some of these examples, the budget committee may be required as part of a formal budget process to approve the recommendations made by the other committees or groups. Such a pro forma approval requirement will not result in a bar of employers of budget committee members, however, the interested budget committee member must make the required disclosure and abstention, thus removing the member from the budget committee's approval of the other committee's recommendation.)

Employers of officers and budget/audit committee members would not be barred from providing donated goods or services, nor would they be barred from a non-commercial or non-financial recognition or award by AHA.

XI. REVIEW COMMITTEE:

A conflict of interest review committee shall be established to advise Corporate Counsel on conflict of interest matters, and respond to questions or make recommendations regarding conflict of interest issues and interpretations of policy and these standards. Also, the review committee shall review nominees for officers and journal editors relative to conflicts of interest as specified hereinbelow.

Appeals from any determination or recommendation of the review committee may be forwarded to the AHA Board of Directors by any volunteer who is affected by a recommendation of the review committee.

The Board of Directors may decline to accept any appeal thereby leaving the recommendation of the review committee in effect, may act positively to affirm a recommendation of the review committee, may request the review committee to reconsider its recommendation, or may substitute its own recommendation for that of the review committee if the Board believes the review committee acted arbitrarily or unreasonably.

Policy and Procedure Manual

The review committee shall be comprised of two to four past chairmen and past presidents of AHA, with an equal number of past chairmen and presidents, appointed by the Board upon recommendation of the Officers for one staggered term of three years; Chairman of the Scientific Publishing Committee; Corporate Counsel; and Internal Auditor.

XII. PROCEDURE:

Upon election or appointment to the board, a committee, subcommittee, task force, working group, editorship, officership, or other AHA group or position, all volunteers shall be provided with: the AHA conflict of interest policy, disclosure questionnaire, sample abstention form, and these standards.

Volunteers shall complete the disclosure questionnaire providing full and complete disclosure of interests, memberships, relationships, arrangements, investments and holdings that potentially could result in a conflict between the volunteer's personal, professional or business interests--and those of the volunteer's immediate family or employer--and the interests of AHA. The volunteer shall return the completed questionnaire to the National Center with the volunteer's notification of acceptance of the appointment or nomination for election. The volunteer shall keep a copy of the questionnaire for reference, and shall provide updates to the National Center whenever material changes occur in the volunteer's situation. In any event, the questionnaire is to be fully re-examined or completed annually during the volunteer's active term of service.

For officer nominees (designated by the Nominating and Awards Committee as nominees for election by the Delegate Assembly) and journal editor candidates (designated for appointment by the Scientific Publishing Committee) before election or appointment, the volunteer shall complete the disclosure questionnaire which shall be reviewed by the review committee for a determination of whether significant potential for conflicts of interest exists and, in such case, for recommendation of a remedy that must be accepted before election or appointment, otherwise the volunteer will be disqualified from service. (Regarding journal editor candidates, the Chairman of the Scientific Publishing Committee and staff Vice President of Communications and Publications, or their designees, shall make a preliminary review and a recommendation to the review committee.)

For other members of the board, committees, council executive committees, subcommittees, task forces or working groups, the completed disclosure questionnaire shall be reviewed annually by the staff responsible for that group to identify potential conflicts of interest in regard to the anticipated activities of that group. The staff shall advise or consult with the group's chairman as necessary or desirable so that the chairman is aware of potential conflicts of interest regarding agenda items being considered by that group, and can act appropriately to facilitate proper disclosure and abstention by volunteers having an actual or potential conflict.

At the first meeting of the fiscal year, the chairman of each group shall remind members of the need to make any material changes to the conflict of interest disclosure questionnaire.

At every meeting, the chairman shall advise members of the conflict of interest policy and procedures, including the requirement for disclosure of a conflict whenever the volunteer has a direct or indirect interest in an issue, abstention from discussion--including leaving the room and refraining from any activities to influence the outcome--and from voting. If disclosure and abstention occurs, the record of abstention form is to be completed by the volunteer and filed

Policy and Procedure Manual

with the original copy of the minutes. The agenda and the minutes of each meeting shall reflect the review of and compliance with the conflict of interest policy and procedures.

At meetings of groups sponsored jointly by AHA and another organization, a comparable conflict of interest procedure shall be followed, whether it be the policy and procedures of AHA or of the other organization.

Regarding officers; members of the board of directors; members of budget/finance, investment, and audit committees; journal editors; or other categories of volunteers identified by Corporate Counsel or the review committee who are responsible for recommending or approving significant expenditures, benefits, property or other rights, entitlements, licenses, relationships, or standards or criteria with application beyond AHA: they shall be required annually to sign a form acknowledging receipt, understanding, and compliance with the AHA conflict of interest policy and standards.

Regarding spokespersons or representatives of AHA, or others who are selected by AHA to make statements or presentations in open forums, they shall be provided with a copy of the AHA conflict of interest policy and, as appropriate or desirable in the circumstances, a copy of these standards or other obligations or restrictions. The appropriate chairman or committee, or the responsible staff, shall make a determination whether, because of the duration or visibility of the activity, the spokesperson will be required to complete a conflict of interest disclosure questionnaire. In all cases, however, an advance determination is to be made whether there is a reasonable probability of actual or perceived conflicts of interest in terms of the individual's own personal, professional or business interests and the interests of AHA in that situation. Regarding the Scientific Sessions in particular, the Scientific Sessions Program Committee may establish specific conflict of interest procedures not inconsistent with AHA policy or these standards.

Regarding staff, all staff shall comply with the same standard of scrupulousness required by the conflict of interest policy and standards. Further, the CEO, Executive Vice Presidents, Vice Presidents, Internal Auditor, and staff involved in corporate relations at the AHA National Center, and executive directors at Affiliates, or other categories of staff identified by Corporate Counsel or the Review Committee shall be required to complete the conflict of interest disclosure questionnaire and also sign the annual acknowledgment and compliance form.

Corporate Counsel shall be responsible for implementation of the conflict of interest policy and standards. Procedural or substantive questions regarding conflict of interest may be referred directly to Corporate Counsel, but the Review Committee cannot delegate its responsibilities regarding review of officer and journal editor nominees.

**Appendix II:
AMERICAN HEART ASSOCIATION
CONFLICT OF INTEREST
PRINCIPLES TO RESOLVE CONFLICT OF INTEREST FOR JOURNAL EDITORS**

At its October 24, 1991, meeting, the Conflict of Interest Review Committee articulated three principles, and requested the Scientific Publishing Committee to codify the three principles into an operational policy for AHA journal editors:

1. Intellectual collaboration by an AHA journal editor with another scientist who is employed by a pharmaceutical, biomedical or biomedical device company poses a potential for conflict of interest and does require disclosure and review by the Conflict of Interest Review Committee, but does not by itself automatically indicate such a material conflict of interest that the relationship must be discontinued. A determination will be made on a case-by-case basis on the underlying facts and circumstances.

2. Use of supplies or equipment provided by a pharmaceutical, biomedical or biomedical device company to a lab in which the AHA journal editor works is governed by the same principle as above, i.e., disclosure and case-by-case review by the Conflict of Interest Review Committee. Whether the in-kind support is provided to the lab or institution as opposed to being directly provided to the journal editor is one relevant factor in determining whether there is such a material or substantial conflict of interest that would require discontinuance of the in-kind support.

3. Any financial support, direct or indirect, by a pharmaceutical, biomedical or biomedical device company of the research or professional activities of an AHA journal editor requires disclosure and review by the Conflict of Interest Review Committee. Financial support of an AHA journal editor's other professional activities by a pharmaceutical, biomedical or biomedical device company generally is presumed to pose a material conflict of interest and to adversely affect the perception of the journal's integrity such that the editor is not permitted to continue to receive direct financial support while an AHA journal editor. Financial support of an AHA journal editor's other professional activities by a pharmaceutical, biomedical or biomedical device company may be determined to be acceptable in the particular facts and circumstances if indirect, immaterial or incidental.