



The American College of  
Obstetricians and Gynecologists  
WOMEN'S HEALTH CARE PHYSICIANS

ACOG  
FOUNDATION

## ACOG CONFLICT OF INTEREST DISCLOSURE POLICY

ACOG relies on its volunteer leadership and staff to avoid actual and potential conflicts of interest as well as situations that may create the appearance of conflict of interest.

ACOG may adopt additional conflict of interest policies for members serving in certain positions. In addition, some ACOG activities may require additional procedures regarding disclosure of actual or potential conflicts. Such additional procedures must be approved by the Executive Vice President and CEO, in consultation with the Chief Legal Officer, before implementation.

**1. Scope.** The purpose of this policy is to describe situations that may create a potential or actual conflict of interest, define the obligation to disclose such situations, and outline a process for handling a potential or actual conflict of interest. This policy applies to all Executive Board members; district and section officers, members of councils, committees (including liaison members) and task forces; volunteers, authors, and consultants; all ACOG employees; and any other individuals who are required to comply with this policy by contract (each a "Covered Individual").

ACOG expects Covered Individuals to use sound judgment and good faith in identifying actual and potential conflicts of interest with the broad objective of disclosing any activity or position that may give rise to a conflict. Covered Individuals are required to follow both the letter and the spirit of this policy. In fulfilling their duties for ACOG, Covered Individuals must act in the best interests of ACOG and not in furtherance of personal or third-party interests. Covered Individuals have an obligation to ensure that ACOG maintains a bias-free decision-making process and to avoid all potential conflicts of interest.

**2. Conflict of Interest.** A conflict of interest may arise when a Covered Individual has some interest or obligation that has the potential to create divided loyalty on the part of the Covered Individual's loyalty between ACOG and some other organization or cause. A conflict of interest may arise from a transaction between ACOG and a third party, or from a Covered Individual's volunteer, paid, or other financial relationship with a third party, which may compromise a Covered Individual's ability to provide unbiased judgment and undivided loyalty to ACOG.

**3. Disclosures.** Annually, or more often if requested, each Covered Individual must complete and submit a Disclosure Form detailing all financial (in excess of \$100), business or other interest in any company, organization, service, product or other concerns that might affect or be affected by ACOG activities. In addition, the Covered Individual must disclose all such interests held by his or her family members and business associates of which he or she has knowledge. Family members include the person's spouse, domestic partner, children, parents and other members of the household. A

business associate is someone with whom the Covered Individual has a business relationship.

Examples of interests that must be disclosed include: ownership of stock (not including stocks held in blind trusts, mutual funds or exchange traded funds over which the individual has no control); substantial gifts; employment; consultancy arrangements; faculty appointments; arrangements with medical, scientific, or related publishers to write articles or to provide editorial services; pharmaceutical investigation or research support; honoraria; or a volunteer position with another non-profit. If the Covered Individual has any uncertainty as to whether certain information should be disclosed, he or she should include that information in the disclosure.

Each Covered Individual must update the Disclosure Form if any significant changes or additions to the submitted information arise during the course of the year.

**4. Process.** Disclosed information shall be provided to the Executive Vice President and CEO, and shared with the volunteer leadership, ACOG staff, and other parties responsible for or involved in the relevant activity or subject, as needed. Any Covered Individual who has an actual or potential conflict of interest in any proposed ACOG activity or subject shall remove him or herself from discussions and actions involving that subject, unless an ACOG vice president or senior staff person requests the Covered Individual to participate.

If there is uncertainty about whether a conflict of interest exists, the question shall be presented for determination by the Executive Vice President and CEO in consultation with the Chief Legal Officer, as necessary. It is important that all individuals subject to the conflict of interest policy understand the importance of full cooperation with this policy to assure maximum integrity of ACOG activities.

Approved by the Executive Boards: December 2016

Revised for name changes: January 2018 and June 2018