

American Psychiatric Association
Disclosure of Affiliations and Interests Policy
(Approved by the Board of Trustees, April 2023)

Participants in the American Psychiatric Association's (APA's) component and governance structure are important in the organization's policy setting, evaluation of research, and ability to speak credibly on a national and international basis. For this reason, APA has adopted a policy of maximum disclosure of Participant's Affiliations and Interests from anyone participating in its governance and component structure. Such disclosure is necessary to ensure the integrity of the APA's policies, positions, publications and other services and to protect the Participants, the APA and the profession.

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, individuals participating in APA activities, 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 be in conflict with the work of the Association, the individual will be expected to disclose the potential conflict prior to the discussion, and if determined by the chair of the committee to be a conflict, recuse themselves from any vote arising from the discussion. If a conflict is identified that is relevant to the work of the Association, and if the member involved is in a superior position creating a power differential (e.g. Executive Committee Member of the BOT, Assembly Officers, Committee Chair), that member will be invited to give a position summary and given time at the discretion of the chair to answer questions, and then be recused from the deliberations and vote. If there is no power differential, the member cannot vote, but can participate in the deliberations. In cases where the Chair of a committee may have a conflict, the Vice Chair shall make the decisions. All parts of APA's governance structure are encouraged to develop their own guidelines for avoiding such potential conflicts to ensure maximum participation by members in deliberations and voting.
4. Every APA meeting where votes will be taken on an issue should have an agenda that is distributed in advance to participants. Summaries of conflict of interest (COI) disclosures of the participants, including name and a list of any companies or products in which the participant has an interest, should accompany the agenda (by hyperlink or other means). Participants shall review the agenda and the reported interests and orally disclose at the beginning of the meeting any Interest or Affiliation they have that has not been disclosed or that has any relevant relationship to the subjects to be discussed at the meeting. Any relevant Interests or Affiliations that arise during the course of the meeting should be disclosed, and the chair of the committee should determine the resolution of the conflict.

Oral disclosures should be up to the date of the meeting. Written disclosure forms are available upon request to the chairperson of each entity prior to each meeting.

5. Disclosure forms shall be updated as new Interests or Affiliations are acquired.
6. 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.
7. The APA has three (3) tiers of disclosure.

Tier #1A: 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 or receive 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 participants and their spouses do not exercise direct control do not count toward these limits.

Not all interests have a direct monetary benefit. Some benefits may be contingent upon outcomes, e.g., shares of stock in exchange for consultancy when the stock has no value until an initial public offering or until a product develops. Other interests may not be readily quantifiable, e.g., if a member provides technical advice on a research project which they plan to publish broadly and thus enhance their reputation. All of these types of interests should be disclosed and will be evaluated by the COI committee on a case-by-case basis.

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. Absent approval from the Board of Trustees, participants at this level should also be willing to divest themselves if the COI committee determines that the non-monetary interest creates an actual or potential conflict significant enough to warrant divestiture for the period of their appointment to the APA groups noted below. Full disclosure is required from the time of appointment or election forward.

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

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, 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 #1A includes:

- DSM Steering Committee; the Chair and Vice Chair of DSM Text Revision projects; the DSM Task Force members; the Practice Guideline Executive and Steering Committees; the Chairpersons and Vice-Chairpersons of the Practice Guideline Workgroups; the Chair of DSM Planning Committee.
- The Chairpersons or Co-chairpersons of the DSM groups and Practice Guidelines groups in Tier 1A ideally should not have any conflict of interests.

Tier #1B:

The analysis for Col in this tier closely follows that of Tier 1A, but some flexibility exists to evaluate whether the interest is:

- Applicable (i.e. directly related to the APA decision making role) or inapplicable (not related to the APA decision making role),
- Direct (payment to the participant) or indirect (e.g. payment to a related other), and
- Active (a current interest) or inactive (not current but within the past three years).

If these factors suggest the interest is attenuated, then exception to the letter of Tier 1A may be made in circumstances where there are not readily available qualified participants who have no conflicts. Participants who fall under Tier 1B may be permitted to participate in discussions, but the Chair person should consider their interests in relation to the subject matter discussed and err in favor of excluding them from voting if the interests are applicable, direct, and/or active.

Tier #1B includes DSM Planning Committee and Review Committee Members.

Tier #2: Full disclosure is required from the time of appointment, election, or publication 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, consultants and workgroup members (including Text Reviewers and Section Editors for Text Revision projects), 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.

8. 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 Col Committee which will forward recommendations for appropriate action to the Board of Trustees.

As used in this policy and in APA's disclosure forms, capitalized terms have the following definitions:

- “**Affiliations**” are close relationships the person has with non-profit corporations, for profit corporations, educational or religious institutions.
- “**Interests**” include financial, professional, personal, and intellectual interests.
- “**Close Associate**” means a domestic partner, spouse and/or dependent child.