



**ASN Society
Service and
Accredited
Education
Disclosure Policies**

Introduction

The American Society of Nephrology (ASN or Society) is a mission-based not-for-profit organization with a vision of “a world without kidney diseases.” ASN represents nearly 22,000 clinicians, researchers and scientists, and educators in more than 140 countries.

ASN’s Council and Officers, Editors and Editorial Staff, as well as Chairs of various committees and task forces, Education Directors, Faculty, Moderators, Committee members, and key staff deal with a variety of issues that may have far-reaching implications. For these individuals to serve in the best interests of the organization it is necessary to understand if relationships exist that may compromise that role. The Society therefore has a policy to prevent bias in decision making separated into two key functions; 1) Society Service, and 2) Accredited Education. The definition and scope of these two functions are different and are detailed below.

Society Service Conflicts of Commitment or Interest Policy

On occasion, situations may exist in which an individual serving the Society in an elected, appointed, or volunteer position or as an employee has some outside interest that would constitute a conflict of interest or that could be perceived as constituting a conflict of interest. Generally, a conflict of interest could be said to exist when individuals have material interests outside the Society that could influence or could be perceived as influencing their decisions or actions on behalf of the Society.

- Questions have occasionally been raised about the appropriateness of members who hold official ASN positions—such as Councilors, Committee Chairs, and Editors-in-Chief (and Deputy Editors) of an ASN journal—holding another official ASN position or leadership position in a comparable society during their current term of office.
- ASN members holding official ASN positions, or under consideration for holding an official ASN position, must disclose to ASN any current or expected conflicts of commitment or interest that are relevant to their ASN position.
- ASN members in official roles should not assume an official role in another organization that conflicts or competes with their official ASN role and ASN’s best interests.
- ASN reserves the right to excuse or prevent a member from holding an official ASN role—such as Councilor, Committee Chair, or Editor-in-Chief (or Deputy Editor) of an ASN journal—that is judged to be inappropriate for them due to the member’s holding a conflicting role in a competing organization.

Accredited Education Disclosure and Independence Policy

In addition to ASN’s organization-wide requirements for disclosure and management of conflicts of interest for Society Service, ASN adheres to the [ACCME Standards for Integrity and Independence in Accredited Continuing Education](#) for all Accredited Continuing Education.

In accordance with the policies of Joint Accreditation for Interprofessional Education (JA) and the Accreditation Council for Continuing Medical Education (ACCME) as well as guidelines of the Food and Drug Administration (FDA) and other ethical guidelines, it is a policy of ASN for individuals (e.g., planners, faculty, authors, reviewers) in control of accredited educational content to disclose “all their financial relationships with ineligible companies within the prior 24 months. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies. Individuals must disclose regardless of their view of the relevance of the relationship to the education” (1). Ineligible companies are “those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients” (1).

1. ACCME Standards for Integrity and Independence in Accredited Continuing Education, December 2020.

Key Requirements for Accredited Education

- All individuals in control of accredited education content must disclose all financial relationships with ineligible companies within the past 24 months.
- Those relationships must be reviewed for relevance to content and relevant relationships must be mitigated, and the mitigation strategy used must be documented.
- Disclosure to learners must occur prior to the start of the activity. Only relevant financial relationships (i.e., those related to the content of the activity) will be disclosed to learners.

Restriction on Participation

Owners and employees of ineligible companies are considered to have unresolvable financial relationships and must be excluded from controlling content or participating as planners or faculty in accredited education, except in the limited circumstances outlined here:

- When the content of the activity is not related to the business lines or products of their employer/company.
- When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations.
- When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.

Individuals with **stock or equity ownership** in a **privately held ineligible company** are considered to have an ownership interest and are subject to the same restrictions and exceptions described above.

Identification of Relevant Financial Relationships

Financial relationships include employee, executive/other leadership role, ownership interest (stock/equity in a privately held company), stockholder (publicly traded stock and/or privately held stock options), research funding, speaker (company paid), consultant/advisor, royalties/patent beneficiary, and other interests or relationships (including eligible companies/non-profits).

Disclosures are reviewed to identify relationships that may be relevant to the content of the education. Financial relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.

Mitigation of Relevant Financial Relationships

It is ASN's policy to identify and mitigate relevant financial relationships with ineligible companies to protect the integrity and independence of our continuing education activities. Disclosures must be collected in advance of the educational activity. Failure to return a completed disclosure form or provide complete disclosure information to ASN is equivalent to a refusal. If a disclosed financial relationship is relevant to the content of the education, ASN will implement mitigation strategies prior to the individual's involvement to prevent anyone with relevant financial relationships from inserting commercial bias into educational content.

Mitigation Strategies for Planners

Planners are involved in the development of continuing education activities, so they must be prevented from influencing content decisions related to their relevant financial relationships. Acceptable mitigation strategies for planners may include:

- **Recusal** from controlling aspects of planning and content with which there is a financial relationship.
- **Independent peer review** of planning decisions by persons with the requisite expertise and without

relevant financial relationships.

- **Divestiture** of the financial relationship.
- **Other mitigation strategies** may be used by ASN in addition to those listed, including but not limited to, content pre-approval, training on accreditation compliance with attestation, and role restriction.

Mitigation Strategies for Faculty and Others

Faculty, authors, and others who control educational content must also have their relevant financial relationships mitigated before they begin their role. Acceptable mitigation strategies may include:

- **Recusal** from controlling aspects of content with which there is a financial relationship.
- **Independent peer review** of content by persons with the requisite expertise and without relevant financial relationships.
- **Divestiture** of the financial relationship.
- **Attestation of evidence-based, commercially unbiased clinical recommendations**, such as by adhering to evidence-based practice guidelines and citing peer-reviewed literature.

Reassessment and Mitigation of Relevant Financial Relationships

When a new relationship is reported to ASN after the initial disclosure form submission, completion of a new disclosure form is not required. However, ASN will conduct a review to determine whether the disclosed relationship is considered relevant to the content of the education. If the newly disclosed financial relationship is relevant to the content of the education, ASN will implement mitigation strategies prior to the individual's involvement.

Educational Content Integrity

To ensure the integrity, independence, and scientific quality of ASN accredited education, all educational materials must adhere to the following standards. Educational materials that are part of accredited education (such as slides, handouts, evaluation mechanisms, or disclosure information) must not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.

- All recommendations for patient care in accredited continuing education must be based on current science, evidence, and clinical reasoning, while giving a fair and balanced view of diagnostic and therapeutic options.
- All scientific research referred to, reported, or used in accredited education in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection, analysis, and interpretation.
- Evolving topics are presented without advocating for, or promoting, practices that are not, or are not yet adequately based on current science, evidence, and clinical reasoning. Sessions that cover these topics must be clearly identified in the program or agenda.
- Accredited education cannot include unscientific approaches to diagnosis or therapy, or education that promotes recommendations, treatment, or manners of practicing healthcare that are determined to have risks or dangers that outweigh the benefits or are known to be ineffective in the treatment of patients.
- Faculty must not actively promote or sell products or services that serve their professional or financial interests during accredited education.
- Only relevant financial relationships with ineligible companies are disclosed to learners prior to the activity for accredited education purposes.