

## Society of Interventional Radiology and Society of Interventional Radiology Foundation Policy on Conflict of Interest

The Society of Interventional Radiology (SIR) and the Society of Interventional Radiology Foundation (SIR FOUNDATION) are committed to improving patient outcomes through image-guided therapy. To limit the potential for bias, SIR and SIR Foundation abide by a strict conflict of interest disclosure, review, and management policy. The overall goal of establishing guidance for the management of possible conflicts is to ensure the integrity of the decision-making processes of the Society and all related entities.

Decision-making that is not biased by financial or professional interests, whether perceived or actual, is critical to protecting the reputations of the Society and Foundation and to maintaining public and member confidence in their objectivity. This document outlines the process SIR and SIR Foundation follow in addressing and resolving conflicts of interest, serves as a guidepost for management to the Conflict of Interest sub-committee, and incorporates by reference other documents adopted by SIR and SIR Foundation relating to or addressing conflict of interest disclosure, review, and management issues.

### I. PRINCIPLES OF CONFLICT OF INTEREST

For the Society and Foundation to further the purposes for which they are organized and maintain the excellent reputation in which they are held by the public and the medical profession, it is important that their decisions and actions not be influenced unduly by any special interests of individual members. Therefore, it is important to identify actual or potential conflicts of interest which may improperly affect Society and Foundation activities and decisions. Accordingly, the Board of Directors of the Society and the Board of Directors of the Foundation have adopted a formal system for the disclosure and evaluation of possible conflicts of interest.

### II. DEFINITIONS

**Conflict of Interest:** Any relationship or other known set of circumstances that has the potential to influence or might reasonably be perceived by others as influencing the member to act contrary to the interests of the Society or the Foundation and for the member's own personal benefit or for the benefit of an immediate family member or business associate. For the purposes of this policy: "an immediate family member" is defined as a member's spouse, domestic or life partner, children, and parents; and a "business associate" is defined as any professional business partner.

- **Financial COI:** Any relationship for which one receives remuneration or in-kind benefits that could be perceived to bias one's judgement in the evaluation of specific recommendations.
- **Intellectual COI:** Any activity that creates the potential for attachment to a specific predetermined point of view that could be perceived to affect one's judgement, conduct or other actions in the evaluation of specific recommendations or suggestions.

**Direct Financial Relationship:** As defined by the CMSS Code for Interactions with Companies, attached as Appendix A, a direct financial relationship is a relationship held by an individual that results in wages, consulting fees, honoraria, or other compensation (in cash, in stock or stock options, or in kind), whether paid to the individual or to another entity at the direction of the individual, for the individual's services or expertise. A direct financial relationship is a compensated relationship that typically generates an IRS Form W-2, 1099 or equivalent income report. As used in CMSS, this does not pertain to stock ownership or intellectual property licensing arrangements.

**Significant Financial Interest:** According to the US Food and Drug Administration's (FDA) *Financial Disclosure by Clinical Investigators* (21CFR 54) (Appendix B) regarding interests requiring disclosure, a significant financial interest means a financial interest consisting of one or more of the following interests of the volunteer leader (and those of the volunteer leader's immediate family member and/or business associate) that reasonably appear to be related to the volunteer leader's responsibilities on behalf of SIR/SIR Foundation:

- With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For the purposes of this policy, remuneration includes salary and any payment for services not otherwise identified as salary (e.g. consulting fees, honoraria, paid authorship, reimbursed or sponsored travel); equity interest includes any stock, stock options, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value; or
- With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the volunteer leader (or the volunteer leader's immediate family member and/or business associate) holds any equity interest (e.g. stock, stock option, or other ownership interest); or
- Intellectual property rights and interests (e.g. patents, copyrights), upon receipt of income related to such rights and interests

The following financial interests are excluded from the definition of significant financial interest:

- Remuneration (e.g. travel reimbursement) paid by SIR/SIR Foundation to the volunteer leader for activities conducted on behalf of SIR/SIR Foundation
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as the volunteer leader does not directly control the investment decisions made in these vehicles
- Income, reimbursement, or sponsored travel from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an institution

of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education

- Income, reimbursement, or sponsored travel from service on advisory committees or review panels for a Federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institution that is affiliated with an institution of higher education

**Conflict of Interest sub-committee:** The Conflict of Interest sub-committee is a subcommittee of the SIR Ethics Committee and is composed of representatives of SIR and SIR Foundation to ensure a broad representation of membership. The subcommittee will be composed of seven members which include the SIR Immediate Past-President, SIR Foundation Immediate Past-Chair, SIR Member Services Division Councilor, SIR Foundation Councilor, SIR Executive Director, and two SIR members at large. The Executive Director will serve as an ex-officio member of the sub-committee. The Member Services Division Council will serve as Chair of the Conflict of Interest sub-committee and is responsible for ensuring the implementation of the SIR and SIR Foundation conflict of interest policy and procedures and for reporting the committee's decisions to the SIR Ethics Committee, SIR Board of Directors and SIR Foundation Board.

**Authorship:** Listed among the authors of a manuscript or other publication that is intended for distribution (first, middle, or last author). Being listed on the acknowledgement section does not count as authorship.

**Editor Role for Book:** Responsible for the organization and content of a book pertaining to Interventional Radiology that is intended for distribution.

**Commercial Advisory Boards, Committees, or Engagements:** Serving on a committee or board organized by a commercial entity on a topic related to a company project, product or promotion.

**Commercial Educational Activity:** Educational forum organized/supported by a commercial entity without conformance to standards required by the American College of Continuing Medical Education (ACCME) (i.e. non-accredited). Examples include: satellite symposia, pharmaceutical or device manufacturer organized educational events, local sponsored lectures, or any talk/presentation using any industry branded, generated, or facilitated slides.

**Commercial Entity:** The ACCME definition of a commercial entity/interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interest unless the provider of clinical service is owned or controlled by an ACCME-defined commercial interest. A commercial interest is not eligible for ACCME accreditation. Commercial interests cannot be accredited providers and cannot be joint providers. Within the context of this definition and limitation, the ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME in which case they would not be considered commercial entities by SIR or SIR Foundation:

- 501-c Non-profit organizations (the ACCME screens 501c organizations for eligibility)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For-profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

**Competing Organization:** Another society or organization with which SIR/SIR Foundation would compete for members, annual meeting attendance, or products.

**Consultancy:** Time-limited business relationship with a commercial entity, where the consultant provides professional input regarding a project, product, or medical topic. To comprise a COI, the consultant must receive some remuneration for their participation which includes in-kind payments such as travel expenses.

**Continuing Medical Education (CME):** As defined by the CMSS Code for Interactions with Companies, CME consists of educational activities for which the learner may receive CME credit based on accreditation awarded to the continuing education provider by a recognized accrediting body. CME activities “serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public, or the profession.” SIR is accredited by the Accreditation Council for Continuing Medical Education (ACCME) and adheres to all accreditation rules defined by the accreditation criteria, standards for integrity and independence in accredited continuing education and ACCME policies when developing and implementing CME activities. Accreditation rules ensure that accredited CME is designed to be relevant, practice-based, effective, based on valid content, and independent of commercial influence.

**Expert Testimony:** Testimony made by a qualified person about a scientific, technical, clinical or professional issue. A key distinction is whether one provides testimony in support of (or opposition to) a pharmaceutical or device company or for a patient.

**Employment:** Refers to a contractual arrangement where the employee performs a service which is paid for by the employer.

**Faculty:** Presenter or moderator at an educational or promotional event.

**Guideline Panelist:** Any person who contributes to the work of developing the guidelines and includes an expectation of authorship, provided they meet the criteria defined by the International Committee of Medical Journal Editors. SIR will follow guidance on COI for clinical practice guideline development from the governing body of the Guidelines International

Network (GIN) and the National Academies of Medicine (NAM). [Please see the SIR policy on Clinical Practice Guidelines for additional detail.](#)

**Investigator:** Investigators on a project usually receive remuneration for their role on the program/project. This typically includes Principal Investigators and Co-Investigators, but not consultants (paid or unpaid). Forms of remuneration include monetary compensation, equipment, travel, or supplies.

**Key Society Leaders:** As defined by the CMSS Code for Interactions with Companies, at a minimum the key society leaders are officers at the Presidential level (e.g., the President-Elect, the President, and the Immediate Past President as applicable) of a Society's membership organization, the chief executive officer of a Society's membership organization, and the Editor(s)-in-Chief of Society Journal(s).

**Non-CME Informational/Educational Program:** A non-CME informational/educational program is a program offered by a society, company, or other third party that provides educational or promotional information and does not offer CME credit.

**Patent Holder or Applicant:** Being listed as the sole or one of several inventors of some disclosed intellectual property submitted for patent consideration.

**Promotional Activities:** Those activities that support, market, or increase sales or consumption of a specific drug, device, technology, or technique, or that are intended to enhance the image, well-being, stature or popularity of a commercial entity pertinent to interventional radiology, independent of remuneration.

**Research Grant:** A research grant is an award that is given by a federal/state agency, company, or society to an individual, institution, or practice to fund the conduct of scientific research. Companies may provide societies with programmatic support designated for the specific purpose of funding Research Grants.

**Speaker's Bureaus:** Being identified as a company sponsored speaker for an educational event where slides or content are at least in part supplied by the company

- If a pharmaceutical or device manufacturer company gives money to an institution or not-for-profit organization (assuming that organization is not financially linked to a pharmaceutical or device manufacturer) to host an event, it is required that the talk title, the talk content, speakers and all funds be negotiated and managed by the institution/organization

**Satellite CME Symposium:** A satellite CME symposium is a company-sponsored CME program held as an adjunct to a Society meeting where CME credit for the symposium is provided by a third party CME provider, and for which the Society receives a fee.

**Society CME:** Society CME refers to CME programs that are planned by a Society for which the Society, as an accredited CME provider, provides CME credit.

**Society Journal:** A Society Journal is a peer-reviewed scientific journal published by a Society or by a publisher on a Society's behalf.

### III. ADDRESSING AND RESOLVING CONFLICTS OF INTEREST

- A. **Duty to Disclosure:** Each officer, director, councilor, committee chair, committee member, task force chair, task force member, the Editor-in-Chief and members of the editorial boards of *The Journal of Vascular and Interventional Radiology* and others holding leadership positions in the SIR and SIR Foundation shall disclose all actual or potential conflicts of the interest which he or she may identify during the course of his or her service to the SIR and SIR Foundation. For the purposes of this document, all of the forgoing individuals will be referred to by the term "Volunteer Leader."

The SIR and SIR Foundation will use a Conflict of Interest Disclosure Form (**Appendix C**) which should be updated annually by each Volunteer Leader and whenever a change in a relationship or a new relationship occurs. It is the responsibility of each Volunteer Leaders to disclose to the COI sub-committee, within 30 days, any new significant financial or professional interest.

The disclosures will pertain to the Volunteer Leader's (and those of the Volunteer Leader's immediate family members and/or business associates) relationships and activities for the past 36 months which relate to the practice of interventional radiology. Annual disclosure statements must be signed and submitted to the Conflict of Interest sub-committee. While SIR and SIR Foundation strive to engage leaders who are free from financial and/or intellectual conflict, the inclusion of experts in the field who have relationships that are deemed to be manageable will permit the inclusion of leading scientists and clinicians in the field.

- B. **Obligation of Volunteer Leaders:** Volunteer Leaders of the SIR and SIR Foundation should avoid conflict between the well-being of the SIR and SIR Foundation and their own personal interests, whether they be financial gain or other responsibilities. To avoid conflicts of commitment, the following principles are listed to provide guidance:
- a. Volunteer Leaders should act in the best interest of the SIR and SIR Foundation, placing the interests of the SIR and SIR Foundation first while carrying out the duties and responsibilities associated with the volunteer role.
  - b. Volunteer Leaders should carry out their responsibilities in good faith with reasonable care, honesty, due diligence.
  - c. Volunteer Leaders should comply with SIR and SIR Foundation governing documents and relevant laws.
  - d. Volunteer Leaders should refrain from using their position at the SIR and SIR Foundation for their personal gain.
  - e. Volunteer Leaders shall maintain confidentiality of meeting proceedings and not share, copy, reproduce, transmit, or disclose confidential information or work in

progress related to the business of the SIR and SIR Foundation unless authorized to do so.

- f. Volunteer Leaders shall disclose conflicts of interest.
- g. Volunteer Leaders shall behave professionally at all meetings which includes being fair and respectful of the rights of others, being inclusive and encouraging open and candid discussion, and being supportive of actions of the collective body on which they serve even if the actions may differ from personal positions, unless the actions are unlawful, unethical, or otherwise improper.
- h. Volunteer Leaders shall refrain from harassment.
- i. Volunteer Leaders shall refrain from making public statements on behalf of the SIR and SIR Foundation unless authorized to do so.

The SIR and SIR Foundation Key Societal Leaders and the Board of Directors and Board of Directors of the Foundation have adopted a Code of Conduct (*will be included as part of the COI policy as **Appendix D***), to ensure that individual members maintain a high standard of ethical and professional conduct in the performance of their responsibilities. Violations of the Code of Conduct should be reported to the President or the Executive Director of SIR. Alleged violations will be investigated by the SIR Ethics Committee and appropriate action taken in the event of a violation which may include a cautionary admonition, a private letter of censure, a request for counseling or other remedial action, a request for resignation or other such action, including removal from office per the SIR Bylaws.

**C. Procedure:**

- a. **Governance** - The Conflict of Interest sub-committee is a subcommittee of the SIR Ethics Committee and is composed of representatives of SIR and SIR Foundation to ensure a broad representation of membership. The subcommittee will be composed of seven members which include the SIR Immediate Past-President, SIR Foundation Immediate Past-Chair, SIR Member Services Division Councilor, SIR Foundation Councilor, SIR Executive Director, and two SIR members at large. The Executive Director will serve as an ex-officio member of the sub-committee. The Member Services Division Council will serve as Chair of the Conflict of Interest sub-committee and is responsible for ensuring the implementation of the SIR and SIR Foundation conflict of interest policy and procedures and for reporting the committee's decisions to the SIR Ethics Committee, SIR Board of Directors and SIR Foundation Board. The Conflict of Interest sub-committee will be responsible for:
  - i. Collecting conflict of interest disclosure statements for Volunteer Leaders
  - ii. Reviewing the conflict of interest disclosure statements for Volunteer Leaders to ensure compliance with the SIR and SIR Conflict of Interest Policy

- iii. Creating conflict of interest management plans for Volunteer Leaders as needed where the management of a conflict means taking action to address a financial or intellectual conflict of interest, which can include reducing or eliminating the financial conflict of interest. Management options can include, but are not limited to, the following:
    - i. Divestment from relationship
    - ii. Abstaining from participation in discussion, writing or voting on matters related to the real or perceived conflict of interest
    - iii. Ability to participate in discussions, but recusal from decision-making or voting on matters related to the real or perceived conflict of interest
    - iv. In cases of written or oral presentations, additional peer review of content
    - v. Reassignment to a committee that will not result in a conflict
    - vi. Change/modify relationship with potentially conflicting interest based on suggestions of the Conflict of Interest sub-committee.
  - iv. Evaluating and managing new financial and intellectual relationships for Volunteer Leaders as they arise
  - v. If the Volunteer Leader disagrees with the determination of the Conflict of Interest sub-committee, the member may appeal the decision to the Ethics Committee to include the SIR Immediate Past President and 3 additional committee members. A majority (3/4) is required to reach a decision, which will be binding
  - vi. Answering questions on conflict of interest from SIR and SIR Foundation members
  - vii. Updating the SIR and SIR Foundation COI Policy as needed
- b. Implementation – The procedures below will be followed to implement the Conflict of Interest Policy and address potential conflicts:
- i. The Conflict of Interest Policy will be distributed to all candidates seeking election or appointment to the SIR Board of Directors , SIR Foundation Board of Directors, committees, workgroups, and task forces.
  - ii. All candidates will complete the Conflict of Interest Disclosure Statement.
  - iii. At the beginning of each new governance year, all Volunteer Leaders will review the Conflict of Interest Policy and complete the Conflict of Interest Disclosure Statement.
  - iv. The Conflict of Interest sub-committee of the SIR Ethics Committee will review the Conflict of Interest Disclosure Statement of each candidate and Volunteer Leader in order to be alert to potential conflicts.



- v. The Conflict of Interest sub-committee will recommend any necessary action to resolve a conflict of interest. The Conflict of Interest sub-committee will discuss their recommendations with the affected candidate or Volunteer Leader, Ethics Committee, Board of Directors , Board of Directors, Nominating committee, workgroup, or task force, as appropriate.
  - vi. A listing of all candidate and Volunteer Leader affiliations will be compiled and shared with the Ethics Committee and Nominating Committee.
  - vii. The Board of Directors , Board of Directors, Nominating Committee, committee, workgroup, or task force will be advised if the conflict of interest has been resolved with the candidate or Volunteer Leader.
  - viii. If the candidate or Volunteer Leader disagrees with the determination of the Conflict of Interest sub-committee, the member may appeal the decision to the Ethics Committee to include the SIR Immediate Past President and 3 committee members. A majority (3/4) is required to reach a decision, which will be binding.
  - ix. The President, the Executive Director, and the Chair of the Conflict of Interest sub-committee will review the conflict of interest disclosure statements and agenda in order to be alert to potential conflicts and to resolve conflicts wherever possible in advance of meetings of the SIR Board of Directors .
  - x. The Chair, the Executive Director, and the Chair of the Conflict of Interest sub-committee will review the conflict of interest disclosure statements and agenda in order to be alert to potential conflicts and to resolve conflicts wherever possible in advance of meetings of the SIR Foundation Board of Directors.
  - xi. The committee, workgroup or task force Chair, Vice-Chair, and staff liaison will review the conflict of interest disclosure statements and agenda in order to be alert to potential conflicts and to resolve conflicts wherever possible in advance of respective committee, workgroup or task force meetings.
- c. **Volunteer Leadership Structure** - The table below lists the volunteer roles which are associated with each level of SIR and SIR Foundation leadership. The Conflict of Interest responsibilities are most restrictive for highest level of leadership and are less restrictive for successive levels of leadership. **Appendix E** summarizes the categorization of relationships and activities and their restrictions by volunteer role.

Level I (Key Society Leaders)	Level II
SIR President*	SIR & SIR Foundation Treasurer

SIR President-Elect†	SIR Foundation Chair*
SIR Secretary†	SIR Foundation Chair-Elect†
SIR Immediate Past President*	SIR Foundation Immediate Past-Chair*
Annual Scientific Meeting Chair#	SIR Board of Directors #
Editor-in-Chief <i>The Journal of Vascular and Interventional Radiology</i> *	
SIR Executive Director/CEO, SIR Foundation*	

\*Positions are expected to be free of any disqualifying direct financial relationships, in accordance with Appendix E, during their term of service

†Positions must divest from any disqualifying direct financial relationships *by the date his or her term as SIR President or SIR Foundation Chair commences* (see section on [Financial Conflicts of Interest for Key Societal Leaders for additional details](#))

#Position must divest from any disqualifying relationships, in accordance with Appendix E, by the date his or her term as commences and must remain free of any disqualifying conflicts during their term of service in this role

**d. Key Societal Leaders and Presidential Line Conflict of Interest Restrictions Summary**

**Financial Conflict of Interest:** SIR and SIR Foundation have chosen to follow the CMSS Code for Interaction with Companies as guidance for the conflict of interest restrictions for key societal leaders. The SIR and SIR Foundation have defined the following leaders as key society leaders: SIR President-Elect, SIR President, SIR Immediate Past President, SIR Executive Director, Editor-in-Chief *The Journal of Vascular and Interventional Radiology*. As such:

- i. The Executive Director of the Society must be free of direct financial relationships with companies during his or her term of service.
- ii. The Editor-in-Chief of *The Journal of Vascular and Interventional Radiology* must be free of direct financial relationships with companies during his or her term of service.
- iii. The President, President-Elect, and Immediate Past President of SIR must be free of direct financial relationships with companies during his or her term of service.
  - The President-Elect of SIR is expected to divest from any direct financial relationships within one year after election or by the date his or her term as President commences. If divesture occurs sooner, divestment must remain until the conclusion of the member’s term as SIR Immediate Past President.

- iv. The SIR and SIR Foundation Conflict of Interest Policy requires disclosure of such interests so that the SIR and SIR Foundation Conflict of Interest Committee may appropriately evaluate if a significant financial interest exists and adjust for such interests.
- Key Societal Leaders who have no income from equity interests in either publicly or non-publicly traded entities related to the practice of interventional radiology where they directly control investment decisions, no income from intellectual property rights and interests, or an aggregate annual income of less than \$5,000 from significant financial interests will be deemed conflict free.
  - Key Societal Leaders with an annual aggregated income between \$5,000 and \$50,000 from significant financial interests, such as income from equity interests in either publicly or non-publicly traded entities related to the practice of interventional radiology where they directly control investment decisions or income from intellectual property rights and interests, will be subject to a conflict of interest management plan.
  - Key Societal Leaders with an annual aggregated income greater than \$50,000 from significant financial interests, such as income from equity interests in either publicly or non-publicly traded entities related to the practice of interventional radiology where they directly control investment decisions or income from intellectual property rights, who choose not to reduce holdings or divest from direct investment decision making will be precluded from serving.

**Intellectual Conflict of Interest:** In order to help ensure that the President of the SIR and the Chair of the SIR Foundation are primarily focused on the interest of SIR and SIR Foundation and to minimize the potential for conflicting or dual fiduciary responsibilities, the Board of Directors of SIR and the SIR Foundation Board of Directors have determined that the SIR President and the SIR Foundation Chair will not hold the position of president of another interventional radiology organization or another national medical society while serving as SIR President or SIR Foundation Chair.



New external leadership appointments and relationships should be disclosed and approved by the Conflict of Interest Committee before the new position is accepted.

- e. **Activities Following Term** – A former Volunteer Leader’s affiliation with another organization following his or her term raises a concern that the Volunteer Leader’s prior affiliation with SIR might be used to promote the policies of such other organization. This situation could arise if the Society’s name is used in connection with any policy of another organization, or if the former Volunteer Leader participates in public representation and advocacy for another organization. A Volunteer Leader’s activities following the end of the Volunteer Leader’s term are restricted as indicated below.
- I. A former Volunteer Leader shall not use the SIR name or his or her prior affiliation with SIR in any manner which would imply SIR support or endorsement of policies or activities of another organization, without prior written approval from the Executive Committee or SIR Board of Directors .
  - II. A former Volunteer Leader shall not use the SIR name or his or her prior affiliation with SIR for commercial gain.
  - III. A former Volunteer Leader shall not disclose confidential or proprietary information.
  - IV. A former Volunteer Leader shall refrain from disparaging SIR. However, the expression of differences or disagreements with SIR policies or positions following the conclusion of a Volunteer Leader’s term do not constitute disparagement.

**Appendix E. Categorization of Relationships and Activities by Role**

Type of Relationship/Activity	Level I (Key Society Leaders*)	Level II
<b>RESEARCH AND EDUCATION</b>		
Authorship of scientific peer-reviewed publications	Acceptable	Acceptable
Authorship of nonscientific publications	Acceptable	Acceptable
Authorship of textbooks/chapters	Acceptable	Acceptable
Authorship of material in support of a commercial entity	Disqualifying	Disqualifying
Editor of textbooks	Manageable	Manageable
Investigator in grant-funded research supported by nonprofit/government entity <i>with funds directed to institution</i>	Acceptable	Acceptable
Investigator in grant-funded research supported by a commercial entity <i>with funds directed to institution</i>	Manageable	Manageable
Investigator in grant-funded research supported by nonprofit/government or commercial entity <i>with funds directed to individual</i>	Disqualifying	Disqualifying
Faculty in CME-/MOC-accredited activity <sup>#</sup>	Acceptable	Acceptable
Faculty in commercially sponsored nonaccredited activity (i.e., satellite symposia)	Disqualifying	Disqualifying
Faculty in commercially sponsored nonaccredited activity where a not-for-profit organization fully controls speaker selection and content (i.e., SIR run commercially sponsored symposia)	Manageable	Manageable
<b>DIRECT FINANCIAL RELATIONSHIPS<sup>†</sup>, ADVISORY/CONSULTANCY ENGAGEMENTS AND PUBLIC STATEMENTS</b>		
Participation in a data-safety monitoring board or independent core imaging interpretation group	Manageable	Manageable
Advisor/consultant to industry on study design, education, or focus group	Disqualifying	Manageable
Issuing statements on behalf of a commercial entity	Disqualifying	Disqualifying
Providing paid expert testimony on behalf of a commercial entity	Disqualifying	Disqualifying
Providing paid expert testimony privately for noncommercial entity (i.e., private sector)	Disqualifying	Manageable
Patent holder or applicant	Acceptable	Acceptable
Investment in mutual funds	Acceptable	Acceptable
Investments (e.g. stock holdings, stock options, warrants, shares, bonds, or any other form of direct investment; not as part of a mutual fund) in pharmaceutical companies, medical device companies or any other commercial entities that manufacture or	Manageable	Manageable

sell products related to interventional radiology practice <sup>^</sup>		
Full-time/part-time employment arrangement with a for profit commercial entity that manufactures or sells products related to Interventional Radiology Practice	Disqualifying	Disqualifying
<b>INVOLVEMENT IN OTHER PROFESSIONAL MEDICAL SOCIETIES / MEETINGS</b>		
Service as President of another national medical specialty society or organization during SIR or SIR Foundation presidency	Disqualifying	Disqualifying
Service as board member or officer of a competing organization with which SIR would compete for members, annual meeting attendance, or products.	Manageable	Manageable
Service as chair of a committee or chair of any major projects (such as guidelines or consensus statements) of a competing organization with which SIR would compete for members, annual meeting attendance, or products.	Manageable	Manageable
Service as chair of a competing organization's annual meeting during term as SIR Annual Meeting Chair	Disqualifying	n/a
Activities as a member (no leadership role) of any committee of a competing organization with which SIR would compete for members, annual meeting attendance, or products.	Manageable	Manageable
Service as board member or officer for another society provided that it is NOT an organization with which SIR would compete for members, annual meeting attendance, or products.	Manageable	Manageable
Service as chair of a committee or chair of any major projects (such as guidelines or consensus statements) for another society provided that it is NOT an organization with which SIR would compete for members, annual meeting attendance, or products.	Manageable	Manageable
Activities as a member (no leadership role) of any committee of another society provided that it is NOT an organization with which SIR would compete for members, annual meeting attendance, or products.	Acceptable	Acceptable
Service as Editor in Chief of a journal in the field of Radiology.	Disqualifying	Disqualifying

\*SIR President-elect, SIR Secretary and SIR Foundation Chair-elect must divest from any direct financial relationships *by the date his or her term as SIR President commences* (see section on [Financial Conflicts of Interest for Key Societal Leaders for additional details](#))

#CME Rule: SIR is accredited by the Accreditation Council for Continuing Medical Education (ACCME) and adheres to all accreditation rules defined by the accreditation criteria, standards for integrity and independence in accredited continuing education and ACCME policies when developing and implementing CME activities. Accreditation rules ensure that accredited CME is designed to be relevant, practice-based, effective, based on valid content, and independent of commercial influence. As a CME provider accredited by the ACCME, the SIR has



established policies and procedures to identify and resolve conflicts of interest for all individuals in a position to control the content of an educational activity. This includes but is not limited to the planning committee members, coordinators, faculty, moderators, peer reviewers, and staff. The policies and procedures are intended to bring bias to the attention of the participants so that they can evaluate the program content accordingly. Written notice of SIRs policy is shared with all coordinators of, and prospective faculty for, any educational activity whether live or enduring.”

†A direct financial relationship is a compensated relationship that generates an IRS Form W-2, 1099 or equivalent income report

^Please see section 3.D of the policy for additional information pertaining to specific positions within Key Society Leaders