



## Annual COI Compliance Report

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### **ANNUAL COMPLIANCE REPORT - 2014-15**

#### **SVS Guidelines for Management of Relationships with Industry and Conflict of Interest Policy**

##### Procedures

- 1) At least yearly, the Conflict of Interest Committee shall review documentation that the SVS Guidelines for Support by Industry are being followed.
- 2) Poor documentation of compliance with the guidelines shall be discussed with the responsible council, committee or staff, and a remedy sought.
- 3) Failure to comply with the guidelines shall be reported to the SVS Executive Committee.

##### Areas of Oversight

## A. SVS transparency and accountability

### **Are written agreements used for all SVS/industry relationships?**

Yes. Letters of agreement are used for industry interactions relating to CME grants, non-CME grants, and other Society projects for which SVS requests contributions from industry. This also includes the SVS Foundation and PSO/VQI. The amount of the financial contribution or equivalent and the terms of the agreement are spelled out in the letter, including how the company will be recognized where applicable.

### **Are the sources and amounts of industry support of SVS disclosed annually on VascularWeb?**

Yes, industry support for the most recent fiscal year for SVS is disclosed here. Industry support for the SVS Foundation is disclosed here.

**Are the SVS Guidelines for Managing Relationships with Industry and COI Policy posted on VascularWeb and communicated to members at least annually?**

Yes, the guidelines are posted on the website under SVS policies and in the corporate partners section.

**Is the SVS policy on joint ventures consistently followed?**

Yes. There were no joint ventures in 2014-2015.

**Is the SVS policy on use of SVS logo and name consistently followed?**

Yes. All uses of the logo and name are reviewed by the SVS Communications Department before permission to use is granted. This also includes the PSO/VQI.

**Is the SVS policy on advertising and sponsorship in print and electronic publications consistently followed?**

Yes. Currently no print or electronic publications are sponsored. Advertising in the Journal of Vascular Surgery is managed by the publisher, Elsevier.

**Have all SVS publications editors, including JVS/JVSVL, VESAP, and Rutherford, been informed of the SVS Guidelines for Management of Relationships with Industry and Conflict of Interest Policy?**

Yes, all editors were sent a copy of the SVS Guidelines and COI Policy. All editors completed disclosures, which were reviewed by the COI Committee.

**Have the PSO Governing Council and Committees been informed of the SVS Guidelines and COI Policy?**

Yes, all Governing Council and committee members were sent a copy of the SVS Guidelines and COI Policy. All members completed disclosures, which were reviewed by the COI Committee. Council and committee chairs were sent the disclosures for their committee members and were reminded of their role in assuring that the guidelines are followed in their committees' activities. No members recused themselves in 2014-15 because of a conflict of interest.

**Has the SVS Board of Directors been informed of the SVS Guidelines and COI Policy?**

Yes. The COI Committee presented amendments to the SVS Board in June 2014 which were approved. The COI Policy was extrapolated from the Guidelines as a stand-alone document. Other amendments included more stringent requirements for committees involved in writing guidelines, document oversight, performance measures or outcomes, and education planning. Chairs and co-chairs of these committees should have no industry relationships. Language was included to further define industry relationships and conflict of interest: the threshold for an individual to be considered conflict free is zero income from industry; individuals with more than \$50,000 in income from industry may not serve on a committee or writing group related to guideline development, document oversight, performance measures or outcomes. In addition, all Board members in 2014 completed disclosures, which were reviewed by the COI Committee. No members recused themselves in 2014-15 because of a conflict of interest.

## B. Industry support for Vascular Annual Meeting

**Are the guidelines for satellite symposia and other industry sponsored education events followed?**

Yes, the guidelines are incorporated into the individual agreements with companies and into the satellite symposia and Vascular Live information distributed with the exhibitor prospectus. The prohibition on Board members not participating in satellite symposia and other industry sponsored promotional events continues to be followed. Companies are also made aware that SVS Board members are prohibited from participating in symposia, Vascular Live presentations, and other industry promotional events.

### **Are the guidelines for exhibitors followed?**

Yes, the guidelines are incorporated into the rules and regulations for the tradeshow. Disciplinary action is taken if companies do not follow the rules and regulations.

### **Are the guidelines for poster exhibits followed?**

Yes, the poster exhibits are in an area segregated from the commercial exhibits.

### **Are the prohibitions on materials with company logos followed?**

Yes, this continues to be followed. The Director of Meetings reviews all materials for compliance.

## C. Industry support for SVS educational activities

### **Have all committees involved in education, including the Education Council, Annual Meeting Program Committee, Postgraduate Education Committee and Research and Education Committee been informed of the SVS Guidelines for Management of Relationships with Industry and Conflict of Interest Policy?**

Yes, all committee members were sent a copy of the SVS Guidelines and COI Policy. All committee members completed disclosures, which were reviewed by the COI Committee. All committee chairs were sent the disclosures for their committee members and were reminded of their role in assuring that the guidelines are followed in their committees' activities.

### **Is the Education Council following procedures to assure that SVS complies with all ACCME standards for commercial support in SVS education programs?**

Yes, SVS is accredited by the Accreditation Council for Continuing Medical Education (ACCME). It is the responsibility of the SVS to ensure all its CME activities are in compliance with ACCME Accreditation Criteria. In accordance with the ACCME's updated standards for commercial support, SVS has implemented a process where everyone who is in a position to control the content of an education activity has disclosed to SVS all relevant financial relationships with any commercial interest. Therefore, faculty members' disclosure information is first reviewed by SVS staff. Should it be determined that a conflict of interest exists as a result of a financial relationship, it is resolved prior to the activity by the Education Council for the moderators/course directors and by the moderators/course directors for the speakers as part of the planning process. The SVS Conflict of Interest Committee serves as the final arbitrator for any unresolved conflicts of interest. All faculty disclosures are published and made available prior to the start of the educational activity and are shared with learners prior to the start of the educational activity. Those individuals who refuse to disclose relevant financial relationships are disqualified from being a part of the planning and implementation of the CME activity.

### **Is the Education Council following procedures to assure that its reporting committees comply with the SVS guidelines and COI Policy?**

Yes, the Education Council and its reporting committee chairs have been provided with the Conflict of Interest disclosures of their members. During discussions involving industry where a potential conflict of interest with an attendee exists, members recused themselves. No members recused themselves in 2014-15 because of a conflict of interest.

**Has the Education Council submitted a report to the Conflict of Interest Committee on how any conflicts of interest have been resolved?**

No. There have not been any unresolved conflicts of interest with industry within the Education Council's reporting committees during this reporting period.

## D. Industry support for SVS and SVS Foundation research activities

**Have all committees involved in research, including the Research Council, Clinical Research and Comparative Effectiveness Committee, Outcomes and Technology Assessment Committee, Quality and Performance Measures Committee and Research and Education Committee been informed of the SVS Guidelines for Support by Industry and the COI Policy requirements?**

Yes. All committee members were sent a copy of the SVS guidelines and COI Policy. All committee members completed disclosures, which were reviewed by the COI Committee. All committee chairs were sent the disclosures for their committee members and were reminded of their role in assuring that the guidelines are followed in their committees' activities.

**Have recipients of SVS and SVS Foundation research awards been informed of the SVS Guidelines for Support by Industry?**

Yes. The recipients of the following SVS and SVS Foundation research awards have been informed of the Guidelines for SVS Management of Relationships with Industry and COI Policy requirements: EJ Wylie Traveling Fellowship (1 recipient), Clinical Research Seed Grants (3 recipients)

**Is the Research Council following procedures to assure that its reporting committees comply with the guidelines?**

Yes. The Research Council assures its reporting committee members comply with the COI policy and asks members to recuse themselves from discussions where they may have a conflict of interest. No members recused themselves in 2014-15 because of a conflict of interest.

**Has the Research Council submitted a report to the Conflict of Interest Committee on how any conflicts of interest have been resolved?**

No. There have not been any conflicts of interest with industry within the Research Council's reporting committees during this reporting period.

## E. Industry support for public and professional outreach activities

**Have all outreach committees, including the Clinical Practice Council, Public and Professional Outreach Committee, Resident and Student Outreach Committee, Diversity and Inclusion Committee been informed of the SVS Guidelines for Support by Industry and the**

**conflict of interest requirements?**

All committee members were sent a copy of the SVS guidelines. All committee members completed disclosures, which were reviewed by the COI Committee. All committee chairs were sent the disclosures for their committee members and were reminded of their role in assuring that the guidelines are followed in their committees' activities. No members recused themselves in 2014-15 because of a conflict of interest.

**Is the Clinical Practice Council following procedures to assure that its reporting committees comply with the guidelines and COI Policy?**

Yes. The Clinical Practice Council assures its reporting committee members comply with the guidelines and COI policy and asks members to recuse themselves from discussions where they may have a conflict of interest.

**Has the Clinical Practice Council submitted a report to the Conflict of Interest Committee on how any conflicts of interest have been resolved?**

No. There have not been any conflicts of interest with industry within the Clinical Practice Council's reporting committees during this reporting period.

## F. Industry support for SVS scholarship activities

**Have all committees involved in awarding scholarships, including the Resident and Student Outreach Committee, International Relations Committee and Diversity and Inclusion Committee been informed of the SVS Guidelines for Support by Industry and the COI Policy requirements?**

Yes, these committees have been informed of the SVS Guidelines for Management of Relationships with Industry and the COI Policy and how they relate to scholarship activities. No members recused themselves in 2014-15 because of a conflict of interest.

**Have recipients of SVS scholarships been informed of the SVS Guidelines?**

Yes, the three recipients of the Women's Leadership Training Grants (sponsored by Gore) have been informed in of the SVS Guidelines for Management of Relationships with Industry and Conflict of Interest. All recipients were informed in a letter accompanying their respective award checks.

## G. Industry support for SVS standard-setting activities

**Have all committees involved in standard-setting, including the Clinical Practice Council, Document Oversight Committee, practice guidelines work groups and the Quality and Performance Measures Committee been informed of the SVS Guidelines for Support by Industry and the conflict of interest requirements?**

Yes. All committee members were sent a copy of the SVS guidelines and COI Policy. All committee

members completed disclosures, which were reviewed by the COI Committee. All committee chairs were sent the disclosures for their committee members and were reminded of their role in assuring that the guidelines are followed in their committees' activities. No members recused themselves in 2014-15 because of a conflict of interest.

## H. Industry donations to SVS Foundation

**Have the SVS Foundation Board of Directors and Development Committee been informed of the SVS Guidelines for Support by Industry and the conflict of interest requirements?**

Yes. All Board and committee members were sent a copy of the SVS guidelines and COI Policy. All committee members completed disclosures, which were reviewed by the COI Committee. All chairs were sent the disclosures for their members and were reminded of their role in assuring that the guidelines are followed in their committees' activities. No members recused themselves in 2014-15 because of a conflict of interest.

**Is the policy on use of corporate donations to the SVS Foundation consistently followed?**

Yes, corporate donations are used in accordance with the policy and support only grant awards. The Foundation follows all guidelines set forth for the SVS in Managing Relationships with Industry and the COI Policy.