**CSDA Conflict of Interest Policy**

**And Disclosure Questionnaire**

**INTRODUCTION**

This is a new Conflict of Interest Questionnaire and it contains at the end three examples of conflict of interest and what needs to be done to correct the conflict. This Questionnaire is more designed to allow the Association to make more precise judgments about potential conflicts. This, in turn, will allow individuals to continue serving the Association except in those areas where there is a specific conflict. **Thus, answering "yes" to many or even most of the questions will not lead to disqualification of the individual. Indeed, in many instances it is important to have individuals who have a certain level of expertise which can only be attained by affiliations with other organizations or companies.**

The intent and purpose of this "Compliance with Conflict of Interest Policy" is to avoid total disqualification and to give more guidance to individuals who complete the Questionnaire. In addition, the examples of Conflict of Interest (at the end of the Questionnaire) teach the following:

1. Affiliations with companies or organizations which have fundamental differences with reference to CSDA policy should be avoided. See Example 1.

1. Affiliations with other organizations or companies may be permitted although the Board representative, council, committee or task force member, spokesperson, consultant, or employee may not participate in the subject where there is a conflict with CSDA positions or policy. However, this does not mean that this would require any resignation on the part of the CSDA volunteers or employees.

See Examples 2 and 3.

**COMPLIANCE WITH CONFLICT OF INTEREST POLICY**

Please complete each question to the best of your knowledge. You may list your answers directly on this form or you may provide your answers on a separate sheet of paper.

The following terms used in this statement have the following meanings:

"CSDA" means the Connecticut State Dental Association and its subsidiaries and affiliates.

"Material financial interest" means:

* + a financial ownership interest of 5% or more, or
  + a financial ownership interest which contributes materially to your income, or
  + a position as proprietor, director, managing partner or key employee.

1. Do you or any members of your immediate family hold or plan to hold a material financial interest in any business which furnishes goods or services, or is seeking to furnish goods or services, to the CSDA?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please list the name of each business and the type of goods or services involved.

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1. Do you hold or plan to hold a material financial interest in any health care business or health care facility, excluding a private dental practice?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please list the name of each business or facility and provide a brief description of the type of business or facility.

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1. Are you, or do you anticipate becoming within the next 12 months, a consultant, employee, or agent of a manufacturer or seller of dental or dentally related products or services?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please list the name of each corporation, position held, and term of position, including the same information for any anticipated position. If the manufacturer or distributor is not a nationally known company, please provide a brief description of the company.

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1. Are you, or do you anticipate becoming within the next 12 months, a trustee, director, officer, council or committee member, employee or consultant of any health care organization or health-related professional society?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please list the name of each organization, position held, and term of position, including the same information for any anticipated position. If the organization is not a nationally known organization, please provide a brief description of the organization.

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1. Do you hold, or do you anticipate holding within the next 12 months, any faculty appointments?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please list the name of each institution, position held, and term of appointment.

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1. Are you involved in, or do you anticipate becoming involved in, public representation and advocacy, or being a spokesperson for any product or company, including lobbying on behalf of any organization?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please list the name of each organization and describe the nature of the activities you are or will be involved in.

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1. Are you involved in any other personal relationship, activity or interest, or are you a member of another organization taking a position on a matter to which you owe a responsibility or influences or restricts your independent judgment, which may raise a conflict of interest or impair your objectivity on evaluating CSDA policies or issues?

No:\_\_\_\_\_\_\_\_\_

Yes:\_\_\_\_\_\_\_\_

If yes, please describe each relationship, activity, interest or membership.

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I understand that I am expected to comply with the Conflict of Interest policy of the Connecticut State Dental Association.

In addition, I understand that in order for this Conflict of Interest policy to be effective I have a continuing responsibility to comply with the Conflict of Interest policy and I will promptly disclose any new affiliations required to be disclosed under the policy.

I understand and agree that as a condition for serving as a member of a CSDA

council/committee/task force, I will exercise particular care that no detriment to the Connecticut State Dental Association will result from conflicts, if any, between my interests and those of the Association.

Having read and understood the Association's policy and having completed this statement to the best of my knowledge and belief, I agree to be bound by the terms hereof.

Signature:

Name:

Date:

Adopted by CSDA Board of Governors

November 11, 2009

# EXAMPLES OF CONFLICT OF INTEREST

**Organizational Goals that are in Conflict:** It is axiomatic that a trustee, council member, spokesperson, consultant, or employee would be unable to act in the best interest of the CSDA and another organization if the fundamental goals of the two organizations were in conflict. In these situations the trustee, council member, spokesperson, consultant, or employee could not fulfill his or her duty of loyalty to the CSDA.

EXAMPLE**:** A trustee, council member, spokesperson, consultant, or employee of the CSDA is elected to the Board of Directors of an anti-amalgam organization.

RECOMMENDATION: In order to further the goals of the anti-amalgam organization the CSDA official or employee would breach his or her duty of loyalty to the CSDA because fundamental goals of the CSDA on public health are in conflict with the anti-amalgam organization. The CSDA official or employee should resign from one of the positions.

**Goals on Major Policy Issues are in Conflict:** A trustee, council member, spokesperson, consultant, or employee may hold a position with an organization that generally strives to support the same dental public health goals of the CSDA. Although the two organizations can be expected generally to support the same dental public health issues there may occasionally be differences in the policy goals.

EXAMPLE: A trustee, council member, spokesperson, consultant, or employee is on the Board of Trustees of a Specialty Organization. The Specialty Organization takes the position that dental accreditation should be done by the Specialty Organization and not the CSDA.

RECOMMENDATION: In this example there is a difference on a significant policy issue but not a difference on fundamental public health goals. Thus, the CSDA trustee, council member, spokesperson, consultant, or employee should not vote or be involved in the decision making at the CSDA level with reference to accreditation. The trustee, council member, spokesperson, consultant, or employee should advise the Board or council of his position in the Specialty

Organization. Here recusal will be sufficient to protect his or her duty of loyalty to the CSDA, and, therefore, resignation is not necessary.

**Organizations with a Financial Interest in CSDA Policy:**

EXAMPLE: A council member is a member of the Board of Directors of a dental manufacturer. The CSDA council is considering a policy which would have an adverse effect on the manufacturer.

RECOMMENDATION: As a director of the dental manufacturer, the council member is required to pursue the financial benefit of the dental manufacturer and thus on this issue his duty of loyalty to the CSDA would be conflicted. The council member should not participate in the vote on this issue.

**Conflicts Involving Competing Business Activities:**

EXAMPLE: A Board member of CSDA Business Enterprises, Inc. is a member of the Board of Trustees of an organization that competes with one or more of CSDA's business activities (dental publisher, affinity cards, etc.).

RECOMMENDATION: The Board member should not participate in the vote on any issue relating to CSDABEI's activities on matters that are in direct competition between the CSDA and the competing corporation. The Board member may vote on other issues so long as the Board member makes full disclosure of his involvement in the competing business.