



Fontan Outcomes Network Policy	Effective Date: January 31, 2022
Conflict of Interest	

1.0 PURPOSE

The purpose of this policy is to identify and provide the standards and responsibilities of Fontan Outcomes Network (FON) leaders serving in leadership roles related to potential, perceived and actual Conflicts of Interests.

The standard of behavior established by FON is that all leaders will avoid or address Conflicts of Interests between the interests of FON, and their personal, professional, and business interests. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflicts of interest, when possible. When not possible, FON leaders will disclose and work with FON leadership to manage those conflicts. The purposes of this policy are to protect the integrity of the FON decision-making process, protect the integrity and reputation of all leaders, and provide accountability to FON member institutions, patients, and families.

2.0 POLICY

All FON leaders must act with integrity and use good judgment in carrying out his/her duties and are expected to:

- (i) abide by the standards set forth in this policy, as well as procedures applicable to specific activities pursuant to or in furtherance of this policy,
- (ii) fully disclose professional and relevant personal activities and relationships that may create, or have the appearance of creating, a Conflict of Interest,
- (iii) remedy or work with FON leadership to manage Conflicts of Interests,
- (iv) remain aware of the potential for Conflicts of Interests, and
- (v) refrain from the acceptance of personal gifts and gratuities with more than trivial monetary value from vendors, contractors, participants, or donors related to FON.



3.0 DEFINITIONS

Conflict of Interest – A situation in which a FON volunteer leader has a financial or nonfinancial interest or professional or other personal consideration that may directly or indirectly affect, or have the appearance of affecting, the individual's judgment in exercising any FON duty or responsibility. Typically, a conflict of interest may arise when an individual has the opportunity or appears to have the opportunity to influence FON's business, administrative, academic, research or other decisions in ways that could lead to financial, professional, or personal gain or advantage of any kind.

Reportable Interest – Any interest that a FON leader has that is related to or may appear related to FON responsibilities and is either a 1) Collateral Activity, or 2) Financial Interest. Collateral Activity is any service outside FON responsibilities including but not limited to service as an officer, volunteer, employee, director or in another fiduciary role, whether or not payment is received for such service. Financial Interest is anything of monetary value, whether or not the value is readily ascertainable, including but not limited to salary, commissions, consulting fees, honoraria, reimbursement of sponsored travel expenses, equity interests (e.g., stocks, stock options, or other ownership interests), allowance, forbearance, forgiveness of debt, interest in real or personal property, dividends, rent, capital gain, and intellectual property rights (e.g., patents, copyrights, and royalties). Determination of whether an interest should be reported does not depend on the type of individual or organization (e.g., family, government, non-profit, for-profit).

FON Leader – members of the ELT, or co-leaders of workgroups and subcommittees.

4.0 EXCLUSIONS

It is understood that FON leaders will have intrinsic interests related to employment at participating care centers. Such relationships are expected, necessary, and apparent and are therefore not subject to disclosure or recusal. Research grants and other non-personal support (e.g., educational grants, donations to clinical or academic programs) would be similarly considered exempt.

These exclusions do not apply when any relationship is reasonably anticipated to have substantive and strong influence that might not be obvious, or if there may reasonably be doubt about the leader's ability to retain objectivity. If there is any such potential for doubt, each FON leader has a responsibility to declare a COI and, as appropriate, recuse and remove themselves with explanation of the context.



When there is question about whether a relationship should be disclosed, it is preferable to transparently declare potential COI. Any excluded situations may still be formally disclosed at the discretion of the FON leader.

5.0 IMPLEMENTATION

FON has implemented several oversight requirements in order to avoid conflicts of interest:

- It is the FON leader's responsibility to disclose potential conflicts using the FON Interest Disclosure form. Disclosure forms will be reviewed annually by network staff and the Executive Leadership Team.
- The Executive Leadership Team will work with volunteer leaders to address and develop necessary management plans for any conflicts of interest.
- A FON leader has an obligation to proactively recuse and remove himself or herself from discussions, deliberations, and votes on topics that may pose or may appear to pose a conflict of interest.

6.0 OVERSIGHT

All revisions of this policy must be approved by the FON Executive Leadership Team. This policy will be reviewed every three years or sooner if deemed necessary.