THE BOARD OF DIRECTORS OF THE
COLLEGE ON PROBLEMS OF DRUG DEPENDENCE
POLICY ON CONFLICT OF INTEREST DISCLOSURE AND RESOLUTION

Purpose of Policy

The College on Problems of Drug Dependence, Inc. (CPDD) is a membership organization whose mission includes among other things, the development and advancement of research on addiction as well as the development of the careers of its members. To this end the Board of Directors is elected by the members to oversee and govern all administrative and fiscal activities, policies and public statements of the CPDD in a fair and impartial manner. This primary responsibility is made more significant by the fact that many of the activities of CPDD are supported with government funding, which also requires assurance of impartiality through the management of any actual or perceived conflicts of interest (COI) among Board members.

Therefore, in order to assure CPDD members and financial sponsors that all actual and perceived COI's are identified and addressed, this policy instructs all CPDD Board members on:

1. What constitutes a real or perceived conflict of interest;
2. The requirements and procedures each Board member should take to report any real or perceived conflict of interest; and
3. How to handle any identified conflict of interest as they are identified in the course of CPDD Board discussions.

Application of Policy

The Board of Directors, including its Executive Director (a non-voting Board Member) are covered by this policy. All covered persons are hereinafter referred to as "CPDD Board Members."

Defining Conflict of Interest (COI)

In general, a COI exists when personal, financial or business interests appear to affect the impartiality of a Board member's decision on an issue of relevance to the interests of the CPDD membership. There are a variety of situations that raise COI concerns, including (but not limited to) the following:

1. ***Financial Interests*** - A COI may exist where a CPDD Board member and/or his/her relative (including spouse, romantic partner, family member), or business/professional organization could obtain or could be denied a financial benefit from a Board member's decision or vote on an issue.

   Examples include but are not limited to:

   - CPDD contracts to purchase or lease goods, services, or property from a CPDD Board member or his/her spouse, romantic partner, family member or business/professional organization;

   - CPDD purchases an ownership interest in, or invests in, a business entity owned by a CPDD Board member or his/her spouse, romantic partner, family member or business/professional organization;

   - CPDD offers employment to a CPDD Board member or his/her spouse, romantic partner, family member or business organization representative;

   - A CPDD Board member or his/her spouse, romantic partner, family member or business/professional organization is provided with a gift, gratuity or favor of a substantial

nature (a value exceeding $100.00) from a person or entity that does business or seeks to do business with CPDD;

- A CPDD Board member or his/her spouse, romantic partner, family member or business/professional organization is provided free or below-market use of the facilities, property, or services of CPDD.

2. ***Non-financial Interests –*** Non-financial conflicts may also compromise impartial governance by CPDD Board members and are sometimes complex. In general, a non-financial conflict for a Board member may exist when his/her vote or decision produces or denies a significant social or career enhancement for that Board member and/or his/her spouse, romantic partner, family member or business/professional organization. Similarly, a non-financial conflict of interest may exist when a Board member's vote, or administrative action, conflicts with a duty or responsibility to some other person, organization, or interest.

   Examples include but are not limited to:

   - A CPDD Board member seeks to obtain preferential treatment by CPDD for him/herself, his/her spouse, romantic partner, family member or business/professional organization;

   - A CPDD Board member seeks to use confidential or proprietary information obtained from CPDD for his/her own benefit, or for the benefit of his/her spouse, romantic partner, family member or business/professional organization;

   - A CPDD Board member seeks to take advantage of an opportunity, or enables a spouse, romantic partner, family member or business/professional organization to take advantage of an opportunity, which the CPDD Board member knows, or should have known, would be of interest to CPDD.

Procedures for Disclosure of Actual or Potential COI

A CPDD Board member is likely to encounter an unexpected real or apparent conflict of interest in the course of pursuing his/her governance duties and voting on issues germane to CPDD. ***It is the duty of every CPDD Board member to understand the definition of COI (see above) and to take proper actions to notify the other Board members and/or Executive Director so that appropriate actions can be taken to resolve that COI***.

Annual Actions

Every CPDD Board member shall complete the attached *Conflict of Interest Disclosure Form* to fully disclose any actual or potential COI, or the appearance of a COI. This general disclosure form will be updated annually.

Event-Related Actions

COIs are most likely (but not exclusively) to occur during routine meetings where there are votes or other administrative actions required of the Board. Sometimes new and unexpected financial or non-financial COIs emerge during these meetings and every Board member is obligated to be alert for any new, real or potential COIs throughout the course of their duties. As soon as any real or potential COI is identified by a Board member they are required to notify the Board President and the Executive Director through a verbal and written amendment to their COI disclosure statement.

All disclosures of COI shall be sent to the CPDD Office. The CPDD Executive Officer shall send his/her personal disclosure form to the President of CPDD, and review all forms with the President. The President shall have his/her form reviewed by the Executive Committee on an annual basis (or more frequently if so required).

Procedures for Board Members to Address Actual or Potential COI

When real or apparent COI issues arise during Board activities the affected member should announce the COI verbally and in writing to the CPDD President and the Executive Director and absent him/herself from both the discussion of that issue as well as any ensuing vote or administrative action pertaining to that issue. The meeting minutes shall reflect that the COI was discussed, the nature of the Board's decision, and that a vote was taken on that decision without the affected member present

Violations of COI Policy

If the President has reason to believe that a CPDD Board member has failed to disclose an actual or potential COI, the President shall inform that Board member of the basis for this belief and allow him/her an opportunity to explain.

If, after hearing the response of the CPDD Board member, documentation of the response, and pursuing further investigation (as required) the President, in determining that the CPDD Board member has failed to disclose an actual or possible COI, or the appearance of a COI, shall take appropriate administrative, disciplinary, and/or corrective actions.

Approved by the Executive Committee on 04/29/15

College on Problems of Drug Dependence
Conflict of Interest Disclosure Form

This Disclosure Form should be completed only after a careful reading of the CPDD Conflict of Interest Policy. Please fill out this form as accurately and completely as possible. Please mail the completed form to the CPDD office (CPDD, 3400 N. Broad Street, Philadelphia, PA 19140), or fax (215-707-1904). All forms will be reviewed by the President of the College and the Executive Committee.

Name of CPDD Board Member: _____

Date of Appointment:

I confirm that the list below is an accurate and complete record of all directorships, affiliations and other positions that I currently hold – or that are held by any close relative or business associate - that actually or possibly conflict, with the interests of CPDD.

I also confirm that I will disclose any other actual or possible conflict with the interests of CPDD that may arise in the course of performing my duties as a CPDD Board member.

Please describe the directorship(s), position(s) or matters(s) relating to you or to your close relatives or associates, that may conflict with the interests of CPDD; and list the reason for the conflict(s). If none, please state "None".

I will immediately inform the CPDD Board, its President and its Executive Director of any material changes in relation to the conflict situation(s) and/or matters described above.

I also confirm that I shall not disclose any confidential information pertaining to CPDD to any of the above-cited individuals, companies, organizations or groups *or use such information for the benefit of the above-cited individuals, companies, organizations or groups; or to another third party.*

SIGNATURE: _____ DATE: _____

CPDD PRESIDENT'S SIGNATURE: _____ DATE: _____