

# **Participating Corporation Program**

**ACNP Participating Corporation Program Description** 

**Guidelines for ACNP Participating Corporations** 

Code of Conduct for Participating Corporations and Designated Representatives

## **ACNP Participating Corporation Program Description**



(Approved by Council January, 2012)

ACNP recognizes the central importance of the pharmaceutical industry and other organizations in developing new and better treatments for people with mental and neurological disorders. In its strategic plan the ACNP has committed itself to establish "effective, collaborative relationships with patient advocacy organizations, government, academia, and industry that help to advance the scientific goals of the College", and to serve as "a catalyst for industry, government and academia to work collaboratively to advance discovery and to disseminate scientific advances". Toward that end Council has developed the Participating Corporation program described below.

### ACNP Council has defined the following levels of Participating Corporation support:

- 1. Full Participating Corporation:
  - a. Annual fee of \$75,000; Full Participating Corporations that pay an annual fee of \$75,000 are allowed 20 Designated Representatives, each of whom may register for the Annual Meeting at the member rate. At least 15 of the Designated Representatives must be scientists involved in CNS research.
  - b. Annual fee of \$50,000; Full Participating Corporations that pay an annual fee of \$50,000 are allowed 12 Designated Representatives, each of whom may register for the Annual Meeting at the member rate. At least 9 of the Designated Representatives must be scientists involved in CNS research.
- 2. Associate Participating Corporation:
  - a. Annual fee of \$25,000; Associate Participating Corporations that pay an annual fee of \$25,000 are allowed 5 Designated Representatives, each of whom may register for the Annual Meeting at the member rate. At least 4 of the Designated Representatives must be scientists involved in CNS research.
  - b. Annual fee of \$12,500; Associate Participating Corporations with fewer than 250 employees may be allowed to pay an annual fee of \$12,500, and are allowed 3 Designated Representatives. At least 2 of the Designated Representatives must be scientists involved in CNS research.

**Benefits of Participating Corporations:** In addition to the number of Designated Representatives to the Annual Meeting allowed at each support level and described above, all Participating Corporations receive the following benefits:

- 1. Opportunity to attend the ACNP Annual Meeting:
  - Considered to be the world's leading forum for the exchange of cutting edge research in neuropsychopharmacology.
  - Attendance at this meeting is restricted to ACNP members and a limited number of invited guests.
  - Participants at the ACNP meeting are basic and clinical scientists who have made major contributions to the field.

- The meeting is specifically designed to promote informal interaction among and between speakers and attendees. All speakers are asked to commit to stay at the meeting for the entire time in order to maximize the opportunity for such interaction.
- The meeting is specifically designed to be focused completely on the science without the commercial distractions and atmosphere that often accompany meetings with large exhibit halls.
- 2. Recognition by level of participation in Annual Meeting materials and signage at the meeting.
- 3. Recognition by level of support on the ACNP Website.
- 4. Each Participating Corporation receives 2 invitations to a Roundtable Luncheon at the Annual Meeting. This is a particularly valuable opportunity to discuss challenges in new treatment development and brainstorm about collaborative solutions.
- 5. ACNP operates its Participating Corporation Program and Educational Grants with complete transparency. All funds received from participating organizations are disclosed on the ACNP website.
- 6. ACNP Council supports the <u>Code on Interactions with Healthcare Professionals</u> published by the Pharmaceutical Research and Manufacturers of America and recommends it to ACNP members and participating corporations.

### Guidelines and restrictions for ACNP Participating Corporations:

- 1. Companies that want to become Participating Corporations must apply for that status by sending application materials as described in the attached <u>Guidelines for ACNP Participating Corporations</u> (the Guidelines). The decision to accept an application is based on evidence that the company will make a scientific contribution to the College and its Annual Meeting, and will contribute to the ACNP mission.
- 2. Payment of the ACNP participating fee is not intended as payment for access to the physician members of ACNP.
- 3. Payment of the ACNP participating fee does not allow the organization to have any influence over the content of the ACNP Annual Meeting or any ACNP publication. Participating Corporations are subject to all the rules and firewalls described in the attached Guidelines.
- 4. ACNP will not use funds from the participating fee payment to attempt to influence legislation.
- 5. ACNP does not condition any recommendations about prescribing practices on the payment of the participating fee.
- 6. Funds from the ACNP participating fee are not used to provide a gift or other benefit to any public official, and will not be used to provide meals or other gifts that would be inconsistent with American Medical Association Guidelines.
- 7. Participating Corporations are expected to abide by the <u>ACNP Code of Conduct for Participating Corporations</u> (attached).

### **Guidelines for ACNP Participating Corporations**

(Revised and Approved by Council January, 2012)



### **Application requirement**

Applicants for participating corporations with the ACNP are required to submit a written application. The purpose of the application is to provide evidence that a corporation can contribute to the scientific mission of the College. ACNP Council will review the application and make a decision regarding the applicant's suitability for participating corporation status. The application must address the following items:

- 1. Provide a brief description of the company.
- 2. Provide evidence of original research in neuropsychopharmacology, including information about CNS drugs in development. This is an essential criterion for membership.
- 3. Describe their potential contribution to the mission of the College.
- 4. Attach biographical sketches of senior research staff.
- 5. Attach at least two letters of support from ACNP members.

### **ACNP Financial Disclosure and COI Firewalls:**

- 1. Corporations must apply to ACNP for participating corporation status. In this application the company must summarize their original research in the CNS area and they must demonstrate their interest in and commitment to the mission of the College. The ACNP Council reviews applications and makes its decision on acceptance based on evidence that the company will contribute to the scientific mission of the College. Minutes of Council meetings document when applications have been rejected because Council was not persuaded that a company could make a contribution to that mission. Corporations accepted are expected to abide by the <u>ACNP Code of Conduct for Participating Corporations</u> and are given a copy of these <u>Guidelines for ACNP Participating Corporations</u>.
- 2. Participating Corporation status within the College does not entitle a company to vote on ACNP official business. The designated representatives of Participating Corporations are not allowed to attend meetings in which official business is conducted, e.g. Council meetings, member business meetings, Program Committee meetings, Publications meetings, etc.
- 3. Participating Corporations, or their designated representatives, are not appointed to ACNP committees, although they are sometimes asked to serve as ad hoc members on certain task forces or committees.
- 4. Grants from Participating Corporations to the ACNP must be unencumbered of obligation to the sponsor, must support legitimate scientific or educational purposes, be based on objective criteria, and must not represent payment for influence or favorable treatment.

- 5. Grants are only accepted by the College in support of programs such as educational programs or research fellowships that are designed to be of benefit to the field and are independently managed by members of the College. Grants are only accepted from companies that have been approved as Participating Corporations.
- 6. All grants are publicly disclosed on the ACNP website (www.acnp.org). All funds received from grants are used for the purpose designated in the grant. Any funds that may remain from those grants are reported on our annual audited financial statement, are carried over and used for that purpose in subsequent years, or are returned to the granting organization.
- 7. The ACNP Executive Office staff handles all financial matters with Participating Corporations, i.e. collecting fees and making grant requests. Staff members have no vote on any official ACNP program activities. The ACNP members who participate in those official College activities are not involved in financial matters and often are not aware of the financial contributions that may or may not have been made by any company.
- 8. All members of key ACNP bodies such as Council, and all committees are required to fully disclose all potential conflicts of interest at least annually. Further, before each meeting of these bodies specific members and officers of the College are charged with the responsibility to monitor for conflict and to make sure that anyone with a conflict of interest relevant to a particular discussion has disclosed that COI and if appropriate, has been recused from the discussion.

### **Annual Meeting Firewalls:**

- All Participating Corporations are treated the same. Each is offered the same
  opportunity to support the meeting and each is acknowledged and recognized in
  meeting materials based on the amount of grant support provided. No specific sessions
  are identified as having been sponsored by a certain company. No support is accepted
  from any company that has not been approved by ACNP Council as a Participating
  Corporation.
- 2. No Participating Corporation is allowed to attend the program committee meeting during which the program for the annual meeting is determined.
- 3. No exhibits are allowed at the meeting, nor are any advertisements allowed in meeting materials.
- 4. Participating Corporations are not allowed to sponsor social activities, satellite sessions, or other events that take meeting attendees away from the meeting site.
- 5. Participating Corporations are allowed a limited number of Designated Representatives to attend the meeting, and a specified number of those Representatives must be scientists rather than marketing or administrative staff.
- 6. The activities of Participating Corporations at the Annual Meeting are monitored by asking all meeting attendees to report on the meeting evaluation any activity that they believed to be inappropriate.

### **Publications Firewalls:**

- 1. The ACNP does not accept advertising in any of its print or electronic publications.
- 2. Editors and Associate Editors of ACNP books, journals, and electronic web sites must disclose to the Chair of the Publications Committee the names of organizations, institutions, companies and individuals (including intermediaries such as subcontractors or conference organizers) from which they have received annual compensation for professional services in excess of \$10,000 in any of the previous three years.
- 3. Professional services include any activities for which the individual is or has been compensated with cash, royalties or fees, promised future royalties or fees, or stock or stock options in exchange for work performed, advice or counsel provided, or for other services related to the Editor's or Associate Editor's professional knowledge and skills.
- 4. Editors and Associate Editors of College publications must submit this information to the Chair of the Publications Committee prior to appointment and must update the list on an annual basis, or more frequently if necessary.
- 5. The information provided is used to make judgments about potential conflicts of interest, to assess whether the number and extent of potential conflicts significantly compromises the individual's ability to perform the tasks required of an editor or associate editor of an ACNP publication, and to appropriately manage potential conflicts of interest by recusing the editor from any matters in which he/she may have a conflict.
- 6. An accusation that an Editor or Associate Editor has violated the conflict of interest policy shall be referred to the ACNP Ethics Committee for consideration and investigation. The Ethics Committee shall report its findings and recommendations to the Publications Committee and Council for action.
- 7. An Editor or Associate Editor found guilty of violating the conflict of interest policy is subject to sanction, up to and including forfeiture of the editorship.

# American College of Neuropsychopharmacology (ACNP) Code of Conduct for Participating Corporations and Designated Representatives



(Revised and Approved by Council January, 2012)

The American College of Neuropsychopharmacology (ACNP) Council endorses the following Code of Conduct for its Participating Corporations and their designated representatives. The ACNP Council insists that Participating Corporations and their designated representatives abide by the Principles of Scientific Conduct as approved by Council in April, 2010 . In addition Council believes that Participating Corporations and their designated representatives to the ACNP should also maintain the highest ethical standards in relationship to the areas of conflict of interest, anti-trust, proprietary information, anti-kickback, compliance with public clinical registries, and participation in the ACNP Annual Meeting.

### I. Conflict of Interest

The primary mission of the ACNP is to advance scientific knowledge and to promote the exchange of scientific and clinical knowledge without commercial bias. ACNP Participating Corporations and their employees, whether they are ACNP members or Designated Representatives, must commit to supporting the ACNP mission free of commercial bias. The ACNP expects that:

- 1. If an ACNP member employed by a Participating Corporation or a Designated Representative is in a position to participate in ACNP scientific discussions that have implications for the commercial interests of his or her employer, the ACNP member (or Designated Representative) should:
  - a. Not participate in those discussions; or
  - b. Only participate in those discussions after having fully disclosed the existence of the potential conflict of interest.
- Disclosure of potential conflict of interest should be made not only to other ACNP collaborators, but also to the public as a part of any communication or publication of the collaboration.
- 3. Members or representatives from Participating Corporations will at all times avoid the appearance of impropriety, even when there may only be a potential conflict of interest. These situations must be taken seriously, and the above two options should be considered in each instance.
- 4. Disclosure of possible conflicts of interest for articles should be included in the transmittal letter at the time the article is submitted. For presentations, potential conflicts of interest should be specified by the presenter. All presentations given by ACNP members and Participating Corporations must disclose any pharmaceutical grant support and whether or not there has been any offer or acceptance of an honoraria or consulting fee.
- 5. Any and all relationships that may be perceived as a conflict of interest must be transparent to the public.

### II. Anti-trust Issues

Participation in ACNP Annual Meetings by employees of Participating Corporations or pharmaceutical companies may involve interaction with individuals from competitor companies on scientific matters. Given that scientific discussions could impact commercial or marketing issues, these individuals should be familiar with applicable anti-trust regulations and should avoid discussions that could result in anti-trust violations.

### **III. Proprietary Information**

ACNP fosters the exchange of scientific information among its members and meeting attendees. However, there are limitations on information that can be shared by employees of Participating Corporations. Employees of a company with commercial interests (whether ACNP members or Designated Representatives) are obligated to keep proprietary company information (e.g., undisclosed research data; development plans; trade secrets) confidential.

### IV. Payments Made to ACNP

Participating Corporations often provide grants to the ACNP. It must be clear and documented that such grants are unencumbered of obligation to the sponsor, support legitimate scientific or educational purposes, are based on objective criteria, and do not represent payment for influence or favorable treatment of the Participating Corporation or its products. Any and all payments, reimbursements and other financial arrangements between an ACNP Designated Representative and ACNP must be documented and approved by the Representative's employer and the ACNP.

### V. Clinical Registries and Disclosure of Data in a Timely Manner

ACNP expects Participating Corporations to remain in compliance with the highest ethical standards regarding the evolving issue of making clinical trial information publicly available.

### VI. Participation in the ACNP Annual Meeting

- 1. ACNP Participating Corporations are encouraged to participate in the ACNP Annual Meeting by sending employee scientists to the meeting, who may propose and/or participate in panel meetings or plenary sessions approved by the ACNP Program Committee.
- 2. ACNP Participating Corporations are expected to comply with the poster presentation guidelines as published annually in the ACNP registration materials.
- 3. Data presented at the annual meeting should reflect original research findings (both negative and positive) be reported or made available in a timely fashion, fully and honestly, both in the professional literature and in presentations at scientific meetings.
- 4. ACNP Participating Corporations should recognize that the ACNP Annual Meeting is dedicated to furthering the exchange of scientific knowledge in the field of neuropsychopharmacology. Therefore, ACNP strongly discourages the presence of non-scientist employees of the Participating Corporations at the annual meeting venue. Participating Corporations and their representatives must refrain from organizing competing activities (e.g. satellite sessions or social functions) that take meeting attendees away from sessions or other College activities and detract from the scientific interaction at the meeting.

- 5. The Representatives of ACNP Participating Corporations should ensure that their participation in the ACNP furthers a legitimate scientific or professional purpose, and that it does not interfere or conflict with the Participating Corporation's business.
- 6. The Representative of ACNP Participating Corporations should ensure that their participation in ACNP has received all approvals that may be required by their employer.
- 7. If there are questions about whether or not a particular activity is unethical, the Designated Representative should take the issue to the ACNP Ethics Committee and/or to his or her company for advice.

#### VII. Enforcement

This code of conduct now represents the standard for behavior that the ACNP expects of its Participating Corporations and their representatives. Any ACNP member who believes that a Participating Corporation or a Designated Representative of a Participating Corporation has violated this code of conduct may bring that matter to the attention of the ACNP Ethics Committee. The Ethics Committee is empowered to investigate the matter, and if upon investigation the Committee believes that the Participating Corporation or Designated Representative is in violation of this code of conduct the Committee will bring that matter to Council. Council will then have the responsibility to conduct any additional investigation it may deem appropriate and to determine any sanction it may deem appropriate, up to and including banning the participation of the organization as a Participating Corporation of the ACNP.