


## CPD-HP (QU Health) Conflict of Interest (COI) Procedure

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	Approved by: 

### 1.0 Purpose Goal

The purpose of this document is to present the procedures relating to Conflict of Interest within accredited CPD activities by CPD-HP (QU Health).

CPD-HP (QU Health) seeks to ensure that no topics or learning activities that are perceived to bear promotional message or appear to be intended for the purpose of endorsing either a specific commercial drug, device or other commercial product or a specific commercial service will be delivered or sponsored by the department.

### 2.0 Procedure development

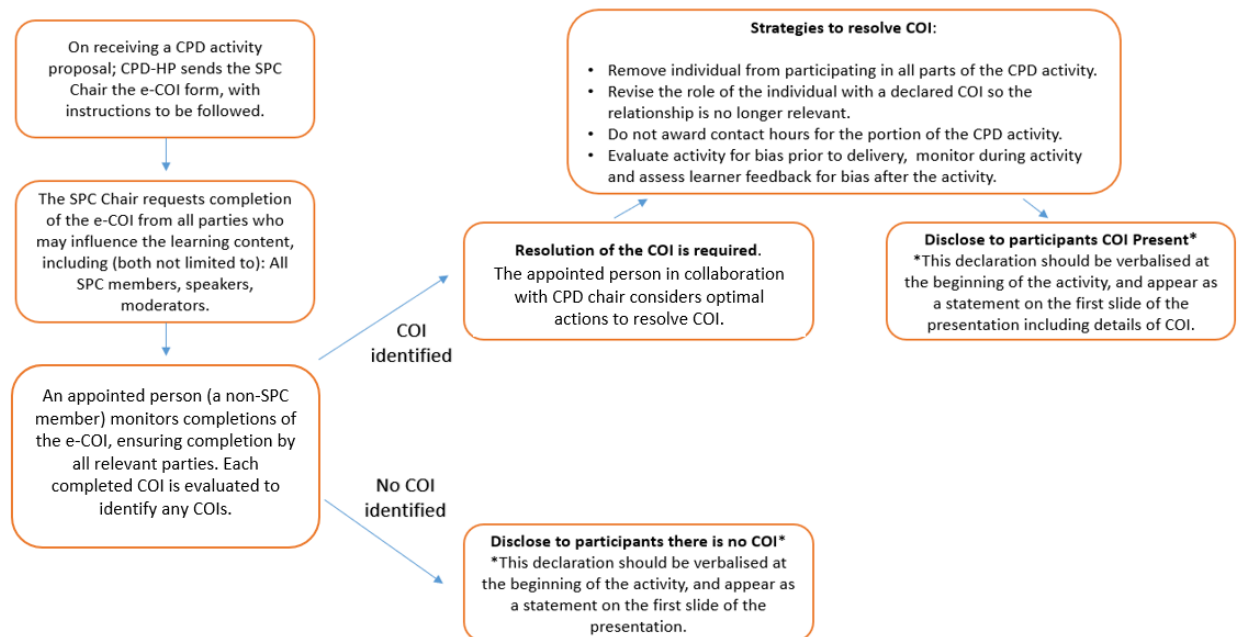
This document and the procedures herein were developed by CPD-HP (QU Health). It was approved and ratified by the decision of the Associate Vice President for Clinical Affairs in the Office of the Vice President for Medical and Health Sciences.

The Head of the QU Health Continuing Professional Development Department is the entity entrusted and systemically responsible for the supervision, management and implementation of the frameworks of this procedure and all accompanying procedures that follow it.

### 3.0 Parties concerned with knowing about this procedure

- President of the university
- Vice Presidents of the University
- Legal advisor/expert
- Deans of the colleges
- Department Director/Department Head
- Teaching staff
- Accounting/finance staff
- CPD participants & healthcare practitioners
- All employees

### 4.0 Procedure Description



## 5.0 Definitions & Responsibilities and tasks

### 5.1 Conflict of Interest (COI)

A conflict of interest (COI) is a situation occurring when an individual or organization is involved in multiple interests, one of which could possibly corrupt the motivation. The presence of a COI is independent of the occurrence of impropriety, but it has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest or public interest. Bias is an inclination or prejudice for (or against) one person, group, product, or service especially in a way considered to be unfair.

All CPD activities conducted or co-sponsored by the CPD-HP will be developed independent of commercial interest and with fair and full disclosure and equitable balance.

Both COI and bias can compromise the quality and professional context of an educational activity, and hence must be identified and resolved before the materials are provided to trainees or participants. CPD-HP (QU-Health) adopts a process where everyone who is in a position to control the content of an education activity has disclosed all relevant financial relationships with any commercial interest.

To ensure compliance, CPD-HP (QU Health) adopt the following definitions:

- **Commercial interest:** is any entity producing, marketing, or distributing healthcare related goods or services used on patients. Clinical service providers are not considered commercial interests.
- **Financial relationships:** are those in which an individual benefits by receiving a salary, royalty, consulting fee, honoraria, ownership interest (e.g., stocks), or other financial benefit, usually associated with roles such as employment, independent contractor (including contracted research), consulting, speaking and teaching, membership of advisory committees, review panels, or board membership, and other activities for which remuneration is received, or expected. Relationships of the individual's spouse are included as those of the individual.
- **Relevant financial relationships:** with commercial interests are any that occurred in the 24 months preceding the time the individual is involved in controlling educational content. There is no minimum payment for relationships to be considered relevant. Inherent in any amount is incentive to maintain or increase the value of the relationship.
- **Conflict of interest:** a conflict of interest exists when personnel's financial, personal or professional interests would potentially or actually compromise the person's professional judgment in conducting or participating in CPD. A conflict of interest also exists when it may be perceived as compromising the person's professional judgment in conducting or participating in CPD. Financial, personal or professional interests include those of the person and those of their immediate family.

## 5.2 Collecting and Identifying Conflict of Interest

On receiving a CPD activity proposal, CPD-HP sends the Chair of the Scientific Planning Committee (SPC) the approved CPD-HP Conflict of Interest Declaration Form (Appendix 1 below), with relevant instructions for the procedure that should ensue.

The SPC Chair should collect the COI declaration from all parties that may influence the learning content and/or delivery; this includes but is not limited to: SPC members, speakers, moderators, presenters.

The SPC Chair should continue to follow-up with all parties to ensure timely submission of the declaration form. On receipt of the declaration forms, they should be transferred to an appointed person (a non-SPC member, appointed by the CPD chair) to evaluate and to identify any declared conflicts of interest, and complete the CPD-HP Resolution of Conflict of Interest Form (Appendix 2 below).

Evaluation of the forms should be conducted with sufficient time before the scheduled CPD activity that permits identified conflict to be fully resolved.

## 5.3 Resolving Conflicts of Interest

Under the circumstances where a conflict of interest is declared, QU CPH-CPD will follow the strategies outlined below to resolve the conflict during the planning process:

- a) The relevant party(s) must be instructed of the necessity of offering unbiased, evidence-based information, not just a personal opinion.
- b) The relevant party(s) must be instructed that only generic names of drugs and health products are permitted to be used in presentations, discussions and written material (unless there is no practical way to identify products with multiple ingredients OR when the use of the commercial name of a drug product or device is made deliberately for purely educational purposes -as in the case of medications with narrow therapeutic-toxic window used in case studies). When use of a proprietary name is required, all pertinent proprietary names shall be used.
- c) The relevant party(s) must be instructed to refrain from promoting or recommending all forms of commercial products or services.
- d) The relevant party(s) must be instructed to refrain from the discussion of off-label use.
- e) Implement the peer review of topic content during the initial stages of CPD planning and prior to the delivery of the activity.
- f) The relevant party(s) is afforded the opportunity to be involved in resolution of the conflict by removing the biased information and/or the promotion of a commercial product or service, if under the supervision of the CPD Coordinator and/or the SPC Chair.
- g) Ultimately **disqualification** of the relevant party(s) should any conflict of interest arise during the early stages of CPE planning or, should the speaker refuse to actively remove sources of bias, information not based on evidence or the literature or the promotion of a commercial product or service.

#### 5.4 Declaring Conflicts of Interest to participants

It is required that at the beginning of the CPD activity and all subsequent individual presentations, that SPC members and speakers disclose all relevant financial relationships. (Financial relationships entirely unrelated to the topic do NOT need to be disclosed.)

Should there be no relevant conflicts, it is also necessary to inform the audience that there are no conflicts of interest.

Declarations should be verbalized and a standard statement should appear on the opening slides of the presentation.

Any involvement should be declared with a suitable phrase, for example:

“I have/had an affiliation (state financial or otherwise) with X pharmaceutical (or medical device etc) organization”

“I am a member of an Advisory Board/ Speakers Bureau (or equivalent) with X organization”

“I have received payment from X organization (including gifts or 'in kind' compensation)”

“I have received grant(s)/ an honorarium from X organization”

“I hold a patent for a product referred to in the CPD activity (or that is marketed by X organization)”

“I am currently participating in (or have participated in) a clinical trial within the past two years”

If relevant financial relationships do exist, in addition to disclosure, party(s) must declare how the content has been adjusted to avoid commercial bias. For example, faculty may state that:

“I am covering topics other than those represented by my relationship with (Name of commercial entity).” Or

“Any recommendations made during this presentation are evidence-based, or consistent with current consensus-based practice.” Or

“I will not be presenting this content in a promotional manner.” Or

“I will not endorse (name of commercial entity) during this presentation.”

#### 6.0 Procedural terms

Speakers who refuse to disclose personal and financial interest will be **disqualified** from further planning and delivering any activity.

# CPD-HP (QU Health) Conflict of Interest Declaration Form

It is a requirement that CPD activities adhere to the **Department of Healthcare Professions (DHP) Ethical Standards for Accredited CPD activities.**

The CPD-HP (QU Health) Conflict of Interest Procedure requires all members of the scientific planning committee, speakers, moderators, facilitators and authors who contribute to the development, delivery and evaluation of accredited CPD activities to disclose their conflicts of interest.

## What is a Conflict of Interest?

A conflict of interest (COI) is a situation occurring when an individual or organization is involved in multiple interests, one of which could possibly corrupt the motivation. The presence of a COI is independent of the occurrence of impropriety, but it has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest or public interest. Bias is an inclination or prejudice for (or against) one person, group, product, or service especially in a way considered to be unfair.

## What is required to comply with the CPD-HP (QU Health) Conflict of Interest Procedure?

1. All CPD activities conducted or co-sponsored by the CPD-HP will be developed independent of commercial interest and with fair and full disclosure and equitable balance.
2. Both COI and bias can compromise the quality and professional context of an educational activity, and hence must be identified and resolved before the materials are provided to trainees or participants. CPD-HP (QU-Health) adopts a process where everyone who is in a position to control the content of an education activity has disclosed all relevant financial relationships with any commercial interest.

To ensure compliance, please review the following definitions:

- **Commercial interest:** is any entity producing, marketing, or distributing healthcare related goods or services used on patients. Clinical service providers are not considered commercial interests.
- **Financial relationships:** are those in which an individual benefits by receiving a salary, royalty, consulting fee, honoraria, ownership interest (e.g., stocks), or other financial benefit, usually associated with roles such as employment, independent contractor (including contracted research), consulting, speaking and teaching, membership of advisory committees, review panels, or board membership, and other activities for which remuneration is received, or expected. Relationships of the individual's spouse are included as those of the individual.
- **Relevant financial relationships:** with commercial interests are any that occurred in the 24 months preceding the time the individual is involved in controlling educational content. There is

no minimum payment for relationships to be considered relevant. Inherent in any amount is incentive to maintain or increase the value of the relationship.

- Conflict of interest:** a conflict of interest exists when personnel’s financial, personal or professional interests would potentially or actually compromise the person’s professional judgment in conducting or participating in CPD. A conflict of interest also exists when it may be perceived as compromising the person’s professional judgment in conducting or participating in CPD. Financial, personal or professional interests include those of the person and those of their immediate family.

**Kindly complete the declaration below and submit to the QU-Health CPD-HP department before the scheduled CPD activity.**

<b>Name:</b>	
<b>Title of CPD Activity:</b>	
<b>Date of CPD Activity:</b>	

Over the previous 2 years, I have **NOT** had a relationship (financial or otherwise) with a relevant for profit/non-for profit organization including (but not limited to):

- a) Any direct financial payments including receipt of honoraria;
- b) Membership on advisory boards or speakers’ bureaus;
- c) Funded grants or clinical trials;
- d) Patents on a drug, product or device; and
- e) All other investments or relationships that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the educational activity.

Over the previous 2 years, I **have** had a relationship (financial or otherwise) with a relevant for profit/non-for profit organization including (but not limited to):

- a) Any direct financial payments including receipt of honoraria;
- b) Membership on advisory boards or speakers’ bureaus;
- c) Funded grants or clinical trials;
- d) Patents on a drug, product or device; and
- e) All other investments or relationships that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the educational activity.

In the table below, please provide details of your declared relationship (if any).

Relevant relationship type	Relevant Organization Name(s)	Relevant Details
Any direct financial payment including receipt of honoraria		
Membership of advisory boards or speakers' bureaus		
Funded grants or clinical trials		
Patents on a drug, product or device		
All other investments or relationships that could be seen by a reasonable, well-informed participants as having a potential to influence the content of the educational activity		
Other		

Check all that apply: as it relates to this CPD activity, I am:

- Member of the scientific planning committee (SPC)
  Speaker  
 Moderator
  Facilitator
  Author

Declaration	Yes	No	Details
I confirm that I do not intend to make therapeutic recommendations that have not received regulatory approval. (i.e. "off-label" use of medication)			
I confirm that I will not make reference to commercial/proprietary name of a drug or device in my presentation (except when ONLY product in the market and the specific trade name is essential to the discussion)			

Declaration: I acknowledge that the above information is accurate and I understand that this information will be publicly available.

Signature:

Date:



## CPD-HP (QU Health) Resolution of Conflict of Interest Form

It is a requirement that CPD activities adhere to the **Department of Healthcare Professions (DHP) Ethical Standards for Accredited CPD activities.**

The CPD-HP (QU Health) Conflict of Interest Procedure requires that an appointed person (a non-SPC member, appointed by the CPD chair) to evaluate the completed conflict of interest declarations, and to identify any declared conflicts of interest. The conflict of interest declaration form should be completed by all parties that may influence the learning content and/or delivery; this includes but is not limited to: SPC members, speakers, moderators, presenters.

The SPC Chair should continue to follow-up with all parties to ensure timely submission of the declaration.

The appointed person (yourself) should complete the form below and include all relevant details.

<b>Name:</b>	
<b>Title of CPD Activity:</b>	
<b>Date of CPD Activity:</b>	

### Part 1: Evaluation of Conflict of Interest

- I confirm that I have received the Declaration of Conflict of Interest from all parties that may influence the learning content of the above mentioned CPD activity.
- I confirm that I have reviewed all Declaration of Conflict of Interest forms.

### Part 2: Resolution of Conflict of Interest

- I confirm that there are no identified potential Declaration of Conflict of Interests. **OR**
- I confirm that I have resolved any potential Conflicts of Interests in accordance with the CPD-HP (QU Health) Conflict of Interest (COI) Procedure (Please provide details below)

<b>Details of potential COI:</b>	
<b>Actions taken to resolve potential COI:</b>	

- Declaration: I acknowledge that the above information is accurate and I understand that this information will be publicly available.

**Signature:**

**Date:**