



THE UNIVERSITY OF BRITISH COLUMBIA  
**Faculty of Medicine**  
Division of Continuing Professional Development

UBC CPD  
The Division of  
Continuing Professional Development  
Faculty of Medicine  
The University of British Columbia  
City Square East Tower, 200-555 W 12<sup>th</sup> Ave  
Vancouver BC Canada V5Z 3X7  
ubccpd.ca

# UBC CPD ETHICAL STANDARDS

## *for Accredited CPD Activities*

### 2024

---



## Table of Contents

Context and Purpose.....	3
Updates to this resource.....	4
Using this resource.....	6
Element 1: Accountability .....	7
Element 2: Content Development .....	9
Element 3: Conflicts of Interest .....	10
Element 4: Commercial Support.....	13
Element 5: Unaccredited Activities.....	16
Footnotes .....	20
Acknowledgements.....	20
Other Applicable Policies .....	20
Appendix A: Disclosure of Conflict of Interest .....	21
Appendix B: Conflict of Interest (COI) Management at UBC CPD.....	22
Appendix C: UBC CPD Non-compliance Procedure.....	24



## Context and Purpose

The UBC CPD Ethical Standards for Accredited CPD Activities (UBC CPD Ethical Standards) apply to all CPD activities accredited and/or certified through UBC CPD.

The UBC CPD Ethical Standards are based on the premise that accredited/certified CPD activities must be:

- trustworthy
- based on best practices and high-quality evidence
- designed to serve physician and patient needs

UBC CPD is committed to ensuring that accredited continuing education (1) presents learners with accurate, balanced, scientifically based and justified recommendations, and (2) protects learners from promotion, marketing and bias.

The UBC CPD Ethical Standards are intended to safeguard the independence and integrity of accredited/certified CPD activities from influences that could lead to bias. They encompass requirements of the two national medical colleges, the Royal College of Physicians and Surgeons of Canada (Royal College) and the College of Family Physicians of Canada (CFPC), and are based on the jointly developed National Standard for Support of Accredited CPD Activities (National Standard).

## A note on the term ‘physician organization’

This document refers to the requirement for accredited CPD activities to be developed by a ‘physician organization’. This term refers to a specific definition created and used in the accreditation/certification standards of the two national medical colleges, CFPC and Royal College, through which Canadian physicians maintain their CPD requirements for provincial medical licensure.

Other health professions may wish to use these standards for activities that are not accredited for physicians, in which case ‘physician organization’ may be substituted for an equivalent health professions organization.



## Updates to this resource

### New/clarified:

- The *UBC CPD Ethical Standards for Accreditation 2024* replace the previous version titled *UBC CPD Guidelines for Support of Accredited and Certified CPD Activities 2020*
- Simplified structure of five defined elements (accountability, content, conflict of interest, commercial support, and unaccredited activities)
- Clarified importance of independence of CPD from external influences
- Clarified accountability structure of physician organization and Scientific Planning Committee (SPC), including management of finances
- Update on content development
- Introduction of a specific step-by-step process to review disclosures and manage conflict of interest, including the definition of healthcare / pharmaceutical industry commercial interest (HPI) and which financial relationships to exclude
- List of SPC list responsibilities expanded to include those from educational standards
- Added requirement to seek multiple commercial sponsors to support a program

Element	UBC CPD Support Guidelines PREVIOUS	UBC CPD Ethical Standards 2024 NEW
<b>1. ACCOUNTABILITY</b>		
Independence from commerce	[Preamble] Affirms need for independence from industry in CPD	1.0 Details the required structure and financial accountability required for independence from industry and external influence in CPD
Physician organization manages finances	4.1 Physician organization manages finances when CPD is commercially sponsored	1.1 Physician organization manages finances for all CPD activities
SPC responsibilities clarified	1.1 Every accredited CPD activity must have a scientific planning committee (SPC), accountable to the physician organization	1.2 Every accredited CPD activity must have a scientific planning committee (SPC) accountable to the physician organization and the SPC is responsible for protecting the CPD learning environment from external influences and personal financial gain
<b>3. CONFLICTS OF INTEREST</b>		
HPI defined	–	Element 3: Addition of Healthcare/Pharmaceutical Industry (HPI) definition – whom to exclude from SPC/decisions /content development
STEP BY STEP INSTRUCTIONS for review of COI disclosure	–	Element 3: Steps for disclosure review: 1. Collect Disclosures 2. Exclude HPI Owners/Employees 3. Identify Relevant Relationships 4. Mitigate/Take Action 5. Inform Participants 6. Check for Content Bias



<b>4. COMMERCIAL SUPPORT</b>		
No single- sponsor activities	—	4.3 The physician organization must seek support from multiple sources to avoid the perception of ownership or influence that a single commercial sponsor may imply
<b>5. UNACCREDITED ACTIVITIES</b>		
SATELLITE SYMPOSIA (returned since covid)	—	5.2 Commercially sponsored symposia are completely separate from the CPD activity



## Using this resource

For any UBC CPD accredited/certified CPD activity, the accountable [physician organization](#) and their appointed [Scientific Planning Committee \(SPC\)](#) is responsible for compliance with the UBC CPD Ethical Standards.

The UBC CPD Ethical Standards are organized into five elements:

1. Accountability
2. Content Development
3. Conflicts of Interest
4. Commercial Support
5. Unaccredited Activities

Elements 1-3 apply to all accredited CPD activities. These elements create an accountability structure to ensure external interests, whether commercial or otherwise, do not unduly influence CPD activities.

Elements 4-5 apply to accredited CPD activities with commercial sponsorship. These elements cover the specific rules in place to ensure commercial sponsors do not unduly influence CPD activities.

A Glossary is provided at the end of the document. Finally, appendices provide the tools available to support adherence to the Standards: (a) UBC CPD Conflict of Interest Disclosure form, (b) Conflict of Interest Management at UBC CPD and (c) UBC CPD Non-Compliance Procedure.

Note on terminology: “accredited” and “certified” are used interchangeably throughout the UBC CPD Ethical Standards, acknowledging terminologies used by the Royal College and the CFPC respectively. The UBC CPD Ethical Standards apply equally to Royal College accredited and CFPC certified programs.



## Element 1: Accountability

Independence of CPD activities from external influence is the cornerstone of accredited continuing professional development (CPD). All CPD activities must be free of undue bias, including marketing or sales of products or services. To support this, the following accountability structure is required:

- 1.1 Every CPD activity must be clearly developed by a [physician organization](#). The physician organization is accountable for the CPD activity in all aspects, including finances. The physician organization must make all decisions regarding the receipt and disbursement of all funds in line with the UBC CPD Ethical Standards. Only a physician organization may seek accreditation.

### KEY ACCOUNTABILITY STRUCTURE

#### What is a physician organization?

**Definition:** A physician is a not-for-profit group of health professionals with a formal governance structure, accountable to and serving, among others, its physician members through continuing professional development, provision of healthcare and/or research.

To be eligible for accreditation of CPD programs, a physician organization must exist for at least one year.

Physician organization membership extends beyond receiving a newsletter; it must meet the following criteria:

- ☐ Membership is comprised of physicians.
- ☐ Membership is not solely comprised of the Board of Directors.
- ☐ Defined criteria on who is eligible to be a member.
- ☐ Defined expectations of members (eg. payment of dues, etc.).
- ☐ Membership includes the right to vote on strategic directions and initiatives of the organization as a whole.

This definition includes (but is not limited to) the following groups: Faculties of medicine, Hospital departments or divisions, medical societies, medical associations, medical academies, physician research organizations, physician clinics, health authority hospital department or medical advisory committee (HAMAC), Canadian provincial medical regulatory authorities (MRAs).<sup>1</sup> See Glossary for exclusions.



- 1.2 Every CPD activity must have a [scientific planning committee \(SPC\)](#), accountable to and overseen by a fiscally responsible physician organization. The SPC is responsible for protecting the CPD learning environment and program content/quality. The SPC must follow the UBC CPD Ethical Standards for all aspects of the CPD activity and ensure that the CPD activity is not used to promote or sell products or services that serve any form of professional or financial interests, including their own.
- 1.3 The SPC must (i) include at least two physicians and (ii) be representative of the target audience. Members must be aware of their responsibilities pertaining to accreditation/certification standards. The SPC must have a chair and an agreed decision-making process to enable it to fulfill its responsibilities.

**SPC responsibilities are to:**

- a. Uphold the UBC CPD Ethical Standards for all aspects of the CPD activity
  - b. Identify the educational needs of the intended target audience
  - c. Develop learning objectives
  - d. Select educational methods
  - e. Select SPC members, speakers, moderators, facilitators and/or authors
  - f. Develop and deliver content
  - g. Evaluate outcomes
  - h. Oversee logistics
  - i. Review disclosures and mitigate conflicts of interest
  - j. Ensure commercial sponsorship support and programming comply with standards
- 1.4 The SPC must identify and address instances of non-compliance with the UBC CPD Ethical Standards. The SPC must have a procedure for addressing non-compliance; where no other procedure exists, the UBC CPD Non-Compliance Procedures (see Appendix) may be used. The SPC must inform UBC CPD should any instances of non-compliance arise.
  - 1.5 Representatives of a healthcare/pharmaceutical industry commercial interest (HPI; see Element 3 for definition) cannot be members of the SPC or participate in decisions related to any aspect of the CPD activity.





## Element 2: Content Development

The content of CPD activities must be accurate, balanced, scientifically based. To support this, the following is required:

- 2.1 The SPC must carry out a needs assessment and base content on the identified educational needs of the intended target audience.
- 2.2 The SPC must ensure all recommendations for patient care are based on current science, evidence and clinical reasoning, while giving a fair and balanced view of diagnostic and therapeutic options.<sup>1</sup>
- 2.3 The SPC must inform content contributors (e.g. presenters, authors, instructional designers, facilitators, moderators, etc.) of the requirements to:
  - develop content and learning objectives based on the identified needs of the target audience [note: SPC should share identified needs with content contributors]
  - develop learning objectives that are [learner-centred](#)
  - create content and materials that provide (where applicable) a balanced view for therapeutic options related to the content area and reflect the current scientific literature
  - describe therapeutic options using generic names (or both generic and trade) and not reflect exclusivity and branding
  - declare any off-label use when making therapeutic recommendations for medications that have not received regulatory approval
  - make every effort to avoid bias, whether commercial or other
  - disclose all financial relationships with commercial and not-for-profit organizations
  - presenters must disclose to learners both on slides and verbally
  - include references to evidence used to create content
  - adhere to time allotment, including time for interactivity such as Q & A
  - ensure content and materials are available to the SPC for review prior to being made available to learners
  - ensure content and materials meet professional standards and legal requirements, including the protection of privacy, confidentiality and copyright
- 2.4 The SPC must collect learners' evaluation responses regarding the degree to which the accredited/certified CPD activity (1) met the stated learning objectives (2) was perceived to be biased (3) motivated the learner to change their practice, and (4) achieved appropriate balance with respect to therapeutic options. Collated responses to the bias assessment must be reported to UBC CPD within three months following delivery of the CPD activity.



## Element 3: Conflicts of Interest

A conflict of interest (COI) occurs when external interests interfere or appear to interfere with the primary interest (in this case, a CPD activity). A global best practice is for all individuals involved in developing CPD activities to be transparent about their financial relationships; this is required for accredited/certified CPD activities. This element describes the processes for gathering and reviewing financial disclosures, identifying and eliminating COIs and conveying this information to learners.

### *Healthcare/Pharmaceutical Industry commercial interests (HPIs)*

Some healthcare professionals may have financial relationships with Healthcare/Pharmaceutical Industry commercial interests (HPIs). These relationships must not be allowed to influence accredited CPD activities. The SPC is responsible for identifying relevant financial relationships between individuals in control of educational content and HPIs and managing these to ensure they do not introduce commercial bias into the CPD activity.

### PROTECT CPD FROM HPI INFLUENCE

#### What is a Healthcare/Pharmaceutical Industry commercial interest (HPI)?

**Definition:** Commercial entities that develop, produce, market, resell, or distribute drugs, devices, products, or other healthcare goods, services, or therapies that may be prescribed to patients or ordered by doctors in the diagnosis, treatment, monitoring, management, or palliation of health conditions. Examples include (but are not limited to): Pharmaceutical companies, medical device companies, medical and surgical supply companies, producers of non-prescription healthcare products, nutrition companies (infant formula, nutritional supplements), pharmacies; diet, fitness, and weight-loss companies; prosthetic and orthotic stores; hearing-test centres; home care companies; etc. clinical services that are owned or controlled by any of the above entities.<sup>3</sup>

- 3.1 To prevent conflicts of interest, the SPC must take the following steps, first among themselves (SPC members), then for all others in control of CPD activity content (e.g., speakers, moderators, facilitators, authors).

### STEPS TO REVIEW DISCLOSURES FOR CONFLICTS OF INTEREST (COI)

**STEP 1: Collect information** from required parties regarding financial and other relationships within the prior 24 months. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount. Individuals must disclose regardless of their view of the relevance of the relationship to the education.

Disclosure information must include<sup>1</sup>:

- i. The name of the entity with which the person has a financial relationship.
- ii. The nature of the financial relationship. Examples of financial relationships include:



- owners and employees
- researcher (research funding from HPIs should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds)
- consultant, advisor, speaker, independent contractor and executive role
- royalties or patent beneficiary and ownership interest
- individual stocks and stock options (diversified mutual funds do not need to be disclosed)

**STEP 2: Exclude owners and employees of HPIs** by reviewing disclosed information to identify individuals who are owners or employees of HPIs. HPI owners and employees are considered to have unresolvable financial relationships because of a legal duty to act in their company's best interests. Owners are defined as individuals who have an ownership interest in a company, with the exclusion of stockholders of publicly traded companies, or holders of shares through a pension or mutual fund. Employees are defined as individuals hired to work for another person or business (the employer) for compensation and who are subject to the employer's direction as to the details of how to perform the job.<sup>1</sup> The SPC must ensure that owners and employees of HPIs are excluded from participating in any aspect of the CPD activity. For owners and employees of other entities, move to step 3.

**STEP 3: Identify relevant financial relationships** by reviewing disclosed information to determine which relationships are relevant to the CPD activity. **Relationships are relevant if the individual or entity stands to gain financially through the development and delivery of the CPD activity.**

**STEP 4: Mitigate relevant financial relationships** to prevent those with relevant financial relationships from influencing content. Mitigate relationships prior to the individuals assuming their roles. Take steps appropriate to the role of the individual. For example, steps for SPC members will be different than for content contributors and must occur before planning begins.

Appropriate mitigation strategies include:

- ✓ The individual recuses themselves from involvement in anything related to their disclosed financial relationship
- ✓ The individual is asked to cover a different subject
- ✓ The individual alters their financial relationship
- ✓ The individual relinquishes control of relevant content
- ✓ Relevant content is reviewed by other members of SPC
- ✓ The individual may need to be replaced

Document the steps taken to mitigate relevant financial relationships.

**STEP 5: Disclose all financial relationships to learners:** The SPC must ensure disclosure to learners, including the following for each SPC member and content contributor:

- i. Name
- ii. Identification of the individuals with financial relationships:
  - Names of entities with which they have relationships
  - Nature of the relationships



- Description of mitigation strategy for the relationship (this may be a strategy included in 3.4 or a statement that the financial relationship is not relevant).

Disclosure to learners must identify the entity by their name only. Disclosure to learners must not include the entity's corporate or product logos, trade names or product group messages. Where an individual has no relevant financial relationship, this should be noted. Learners must receive disclosure information in a format that can be verified at the time of accreditation, before engaging with the CPD activity.<sup>1</sup>

**STEP 6: Check content for bias:** Where feasible, check content for indications of bias *before* it is made available to learners.

- 3.2 Any individual who fails to disclose their relationships as described cannot participate as a member of the SPC or content contributor of the CPD activity.



## Element 4: Commercial Support

When *commercial support* (defined as financial or in-kind support from healthcare / pharmaceutical industry (HPI) or other for-profit entity) is sought, the SPC is responsible for ensuring the support does not result in commercial influence in the CPD activity. Commercial support, also known as sponsorship, cannot establish a financial relationship between the sponsoring HPI and the SPC or others in control of content of the CPD activity.

- 4.1 The physician organization is responsible for the management of all financial and in-kind support for the development, delivery and evaluation of the CPD activity.
- 4.2 The physician organization cannot be required to accept direction or advice from a commercial sponsor as a condition of the CPD activity receiving support. Specific interests of any commercial sponsor must have no direct or indirect influence on any aspect of the development, delivery or evaluation of an accredited CPD activity.
- 4.3 The physician organization must seek support from multiple sources to avoid the perception of ownership or influence that a single commercial sponsor may imply. It is preferential to have multiple sponsoring organizations with competing products or services to provide balance.
- 4.4 The terms, conditions and purposes of commercial support must be documented in a written, countersigned agreement between the commercial sponsor and the physician organization. The commercial sponsorship agreement outlines the opportunities that commercial sponsors have for supporting a CPD activity. The opportunities for commercial sponsors are limited to *only* the following:
  - a. an opportunity to interact with physicians that is separate from the CPD activity
  - b. display space in an exhibit area that is separate from the CPD activity with choice of location depending on the support level
  - c. limited number of representatives attending the CPD activity, clearly identified and non-participating
  - d. acknowledgment of all commercial sponsors together, listed in tiered sponsorship support levels in permitted sponsor recognition locations separate from the CPD activity
- 4.5 The physician organization must ensure honoraria and/or reimbursement of contributors is reasonable. Honoraria and reimbursement for travel, lodging and meal expenses to members of the SPC, speakers, moderators, facilitators or authors should be similar to an equivalent activity that does not have commercial sponsorship (i.e., commercial sponsorship should assist in covering the cost of the activity, not augment the activity and associated payments).
- 4.6 Learners cannot be offered or accept any payment, subsidy or other compensation from any commercial sponsor. Note that learners may claim compensation from residency programs, employers or provincial CPD support funds, even when activities they attend have received support from these sources.
- 4.7 Expenses of partners/spouses of the SPC, content contributors or learners cannot be paid for by a commercial sponsor.



- 4.8 Commercial sponsorship cannot cover the entire cost of a CPD activity; learners are required to pay a reasonable registration fee (minimum \$100 p/day). The registration fee requirement may be waived if the physician organization ordinarily charges a yearly membership fee that explicitly includes a reasonable fee reduction or waiver for members attending the CPD activity. Allied health professionals and trainees may be offered reduced or waived registration fees.
- 4.9 The physician organization must keep a record of the amount or kind of commercial support received and how it was used and must produce that accounting, upon request, to UBC CPD or the sponsor that provided the commercial support.
- 4.10 Learners must be informed of the names of the sponsors providing commercial support. This is to ensure transparency. When informing learners, commercial sponsors' names must be shared in accordance with 4.11 (see below).
- 4.11 The SPC must ensure commercial sponsors are recognized only in permitted locations, using the following standard acknowledgment statement:

*"Funds in support of [Name of CPD activity] were provided as an educational grant to [Name of physician organization]. The funds were independently allocated and disbursed in accordance with the UBC CPD Ethical Standards, adherent to the National Standard."*

Beyond the standard acknowledgement statement, the linking or alignment of a commercial sponsor's name (or other branding strategies) to a specific educational session or section of an educational program within an accredited group learning activity is prohibited.

**Permitted locations to recognize commercial sponsors:**

**In-person:**

- in the introductory/break slides
- in printed syllabus only when separated from educational content
- in a separated exhibit area

**In electronic formats:**

- in separate tab on app or website
- hyperlink to commercial sponsor website, with statement clearly indicating learner is leaving CPD activity/physician organization website
- in a separated virtual exhibit area

**Not permitted**

Along with any other forms of commercial sponsor acknowledgment or incentives, are not permitted:

- no company advertisements
- no marketing material describing what a company does in educational program (a separate exhibitor program is permitted)
- no trade names, product names or group messages to learners from the event
- no endorsements of the company or its products by the physician organization



- no swag, insets, lanyards or other commercial sponsor materials in participant bags
- no acknowledgement in educational program, brochures/flyers, certificates, presenter slides, meals
- no company or product colours
- no use of commercial sponsor sites for CPD activity

- 4.12 Any commercial exhibits or booths must be clearly separated from the CPD activity, whether in-person or online. The SPC must communicate the following requirements to the commercial sponsor representatives and ensure that they have no participation in the CPD activity:
- the proportion of representatives must be minimal in terms of overall learners
  - commercial sponsor representatives must be clearly identified so there is a visible difference between them and the physicians/other health professional learners
  - representatives may go into the learning space but only as observers (i.e. non-participating)
  - representatives cannot market products at any point during the CPD activity (exhibit area excepted)
  - representatives cannot complete evaluation forms or be considered in needs assessments

NOTE: In cases where there is no exhibit area, these elements must still be in place.

- 4.13 The only permitted incentive for learners to visit commercial exhibits is the “exhibitor passport” in which learners receive a stamp for visiting an exhibit booth. The completed passport may be entered into a draw for a prize, which must be paid for by the physician organization. Any other forms of participant incentives are not permitted.
- 4.14 The physician organization has an obligation to ensure their interactions with commercial sponsors meet professional standards and legal requirements including the protection of privacy, confidentiality, copyright and contractual laws and regulations.



## Element 5: Unaccredited Activities

- 5.1 CPD activities must clearly have greater importance and time duration than any associated unaccredited activities, such as social activities. Unaccredited activities cannot occur at a time or location that interferes with, competes with, or takes precedence over CPD activities. The cost of unaccredited activities (excluding modest meals and breaks offered during a CPD activity) should be paid for by learners.

5.2 **Satellite Symposia**

Satellite symposia are unaccredited activities led by commercial sponsors for promotional purposes held in proximity (either spatially or temporally) to CPD activities.

The SPC must ensure learners do not perceive promotional activities, such as Satellite symposia, as related or integral to the accredited/certified CPD activity, by ensuring:

- planning, budget, marketing and execution are the sole responsibility of the sponsoring company
- satellite symposia do not run concurrently with the accredited/certified program.
- satellite symposia are separated (either physically or virtually) from the accredited/certified activity
- satellite symposia are not listed or included within the preliminary or final program agenda, programs, homepage, calendar of events, learner materials, announcements, etc.
- registrants are informed that satellite symposia are not part of the accredited/certified CPD activity
- satellite symposia are promoted in a way that clearly identifies them as distinct from the accredited/certified CPD activity, with the disclosure that “This is a non-accredited, commercially sponsored, Satellite Symposia and is NOT part of the accredited *Title of CPD Activity*.”
- learners must not feel compelled to attend Satellite symposia through any incentives





## Glossary of Terms

Term	Definition
Accredited CPD activity	An educational activity that meets the administrative, educational and ethical standards of the Royal College of Physicians and Surgeons of Canada, College of Family Physicians of Canada or Conseil Québécois de Développement Professionnel Continu des Médecins. Accredited and/or Certified CPD activities include group learning, self-learning and assessment, delivered in a live or electronic format. See also Certified CPD activity.
Author	The developer of content within eLearning modules, abstracts, posters, presentation slides or any other written or visual materials provided to learners of an accredited/certified CPD activity.
Bias	A predisposition that prevents impartiality or which promotes an unfair, limited or prejudiced viewpoint.
Certified CPD Activity	Certified is the term adopted by the College of Family Physicians of Canada to replace the term “accredited” in the CFPC Mainpro+ program. See also Accredited CPD activity.
Co-Development ?	
Conflict of interest (COI)	A conflict of interest occurs when competing or multiple interests, usually concerning a perceived benefit, arise for an individual responsible for decision-making. It is a set of conditions in which judgement or decisions concerning a primary interest (eg, patients’ welfare, the validity of research and/or organizational policy) are unduly influenced by a secondary interest. The primary example of a secondary interest is likely financial gain, either personal or organizational, but can also extend to academic or career advancement and benefit to family, friends or colleagues. Mere existence of a COI does not imply wrongdoing. When COIs do arise, they must be recognized, disclosed and appropriately managed.
Content contributors	Anyone contributing to content for a CPD activity. Includes presenters, authors, instructional designers, facilitators, moderators, etc.
CPD activity	An activity intended to enhance knowledge, skills, attitudes, performance or health outcomes across the CanMEDS/CanMEDS-FM Frameworks. Includes conferences, workshops, asynchronous online courses, webinars etc.
Facilitator	A person that facilitates; especially one that helps to bring about an outcome (as learning, productivity or communication) by providing indirect or unobtrusive assistance, guidance or supervision.
Financial support	Monetary contributions for the development, delivery or evaluation of a CPD activity, learning resource or tool.



Healthcare/pharmaceutical industry commercial interest (HPI)	Commercial entities that develop, produce, market, resell, or distribute drugs, devices, products, or other healthcare goods, services, or therapies that may be prescribed to patients or ordered by doctors in the diagnosis, treatment, monitoring, management or palliation of health conditions. Examples include (but are not limited to): Pharmaceutical companies, medical device companies, medical and surgical supply companies, producers of non-prescription healthcare products, nutrition companies (infant formula, nutritional supplements), pharmacies; diet, fitness, and weight-loss companies; prosthetic and orthotic stores; hearing-test centres; home care companies; etc. clinical services that are owned or controlled by any of the above entities. <sup>3</sup>
Incentive	Something that incites, or tends to incite, determination or action.
In-kind support	Services, tools or human resources with a monetary value that are provided to an organization in support of a CPD activity, learning resource or tool.
Learner-centred objective	A specific, short-range and relatively concrete objective. It describes what a learner will be able to do differently (what learner behaviour will change) if they attend the CPD activity.
Moderator	A person who presides over an assembly, meeting or discussion.
Perceived conflict of interest	A perceived conflict of interest is the appearance of a conflict of interest as judged by outside observers regardless of whether an actual conflict of interest exists.
Physician Organization	<p>A physician is a not-for-profit group of health professionals with a formal governance structure, accountable to and serving, among others, its physician members through continuing professional development, provision of healthcare and/or research.</p> <p>To be eligible for accreditation of CPD programs, a physician organization must exist for at least one year.</p> <p>Physician organization membership extends beyond receiving a newsletter; it must meet the following criteria:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Membership is comprised of physicians.</li><li><input type="checkbox"/> Membership is not solely comprised of the Board of Directors.</li><li><input type="checkbox"/> Defined criteria on who is eligible to be a member.</li><li><input type="checkbox"/> Defined expectations of members (eg. payment of dues, etc.).</li><li><input type="checkbox"/> Membership includes the right to vote on strategic directions and initiatives of the organization as a whole.</li></ul> <p>This definition includes (but is not limited to) the following groups:</p> <ul style="list-style-type: none"><li>• Faculties of medicine</li><li>• Hospital departments or divisions</li><li>• Medical societies</li><li>• Medical associations</li><li>• Medical academies</li><li>• Physician research organizations</li></ul>



	<ul style="list-style-type: none"><li>• Physician clinics</li><li>• Health authority hospital department or medical advisory committee (HAMAC), Canadian provincial medical regulatory authorities (MRAs)</li></ul> <p>This definition excludes:</p> <ul style="list-style-type: none"><li>• Healthcare/pharmaceutical industry commercial interests (HPIs) (see definition)</li><li>• Health authority administration offices</li><li>• Disease-oriented patient advocacy organizations (e.g. Canadian Diabetes Association)</li><li>• Government departments or agencies (e.g. Health Canada, Public Health Agency of Canada)</li><li>• Small number of physicians working together solely and specifically to develop educational programming<sup>1</sup></li></ul>
Real conflict of interest	A real conflict of interest exists when two or more interests are indisputably in conflict.
Scientific Planning Committee (SPC)	<p>A group of target audience representatives who are responsible for: identifying the educational needs of the intended target audience; developing learning objectives; selecting educational methods; selecting SPC members, speakers, moderators, facilitators and/or authors; developing and delivering content; evaluating outcomes; overseeing logistics; reviewing disclosures and mitigating conflicts of interest; and ensuring commercial sponsorship support and programming comply with standards. The SPC may also include members with specific expertise, e.g., content experts and educational design experts. <b>The SPC cannot include employees or owners of healthcare/pharmaceutical industry commercial interest (HPI).</b></p> <p>The SPC must have a chair and agreed decision-making process to enable it to fulfill its responsibilities.</p>
Speaker / Presenter	Individuals selected by a scientific planning committee based on their recognized expertise and skills to prepare and present information or evidence at a planned educational session in a CPD activity.
Social Activity	A gathering of individuals that enables social interaction. Must be clearly differentiated from the CPD activity. Note that social activities do not include meals or breaks during a CPD activity.
Commercial sponsor	A for-profit entity that provides financial or in-kind support, including goods or services in support of CPD activities, learning resources or tools.
Commercial sponsorship	The process by which a for-profit entity provides financial and/or in-kind support for a CPD activity, learning resource or tool.
Support	The provision of financial and/or in-kind resources provided for a CPD activity, learning resource or tool.



## Footnotes

- <sup>1</sup> Accreditation Council for Continuing Medical Education. *Standards for Integrity and Independence in Accredited Continuing Education*. Published 2020
- <sup>2</sup> Royal College of Physicians and Surgeons of Canada. *How to Identify a Physician Organization: A Checklist*. Published 2021
- <sup>3</sup> College of Family Physicians of Canada. *Understanding Mainpro+ Certification*. Published 2021

## Acknowledgements

The UBC CPD Ethical Standards for Accredited CPD Activities were updated by UBC CPD in 2023 in consultation with the UBC CPD Advisory Committee (includes representation across UBC Faculty of Medicine Departments).

Thanks to the following sources:

Accreditation Council for Continuing Medical Education. (2020). *Standards for Integrity and Independence in Accredited Continuing Education*. [accme.org/publications/standards-for-integrity-and-independence-accredited-continuing-education-pdf](https://accme.org/publications/standards-for-integrity-and-independence-accredited-continuing-education-pdf)

University of Toronto. (2018). *Policy on Commercial sponsorship Support of University of Toronto Accredited Programs and Conferences*. [www.cpd.utoronto.ca/reports/CPD-Commercial-Commercial-sponsorship-Policy-2018.pdf](https://www.cpd.utoronto.ca/reports/CPD-Commercial-Commercial-sponsorship-Policy-2018.pdf)

## Other Applicable Policies

Physicians who participate in CPD activities must adhere to the [Canadian Medical Association's Policy Guidelines for Physicians in Interactions with Industry](#).

UBC Faculty of Medicine faculty members are also bound by [UBC Faculty of Medicine Relationship with Industry Policy and UBC Policy \[SC3\] on Conflict of Interest and Commitment](#).

The UBC CPD Ethical Standards comply with these guidelines and policies.



## Appendix A: Disclosure of Conflict of Interest

The disclosure process is outlined in the UBC CPD Ethical Standards, based on the [National Standard](#), which describes the requirements for gathering, managing and disclosing financial relationships of members of the scientific planning committee (SPC) and content contributors (presenters, moderators, facilitators, authors) to participants.

CPD Activity Title \_\_\_\_\_ & Date(s): \_\_\_\_\_

My role(s) in the CPD activity: (check all that apply):

☐ SPC Member ☐ Speaker ☐ Moderator ☐ Facilitator ☐ Author ☐ Other \_\_\_\_\_

### MY FINANCIAL DISCLOSURE

*Disclose all financial relationships that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the educational activity. This may include owner, employee, researcher, consultant, advisor, speaker, independent contractor, executive role, royalties, individual stocks, stock options (diversified mutual funds do not need to be disclosed), etc.*

Select one of the following statements:

- ☐ I do NOT have a relationship (financial or otherwise) with for-profit or not-for-profit organization(s) w/i past 2 years to disclose.  
☐ I have/had a relationship (financial or otherwise) with for-profit or not-for-profit organization(s) w/i past 2 years:

	Relationship Type(s) (within past 2 years)	Name(s) of for-profit or not-for-profit entities	Description of relationship(s)
A	Any direct financial payments including receipt of honoraria		
B	Membership on advisory boards or speakers' bureaus		
C	Funded grants, research or clinical trials		
D	Patents on a drug, product or device		
E	All other relevant investments or relationships *		

### Content contributors (presenters, moderators, facilitators, authors) ONLY:

I intend to make therapeutic recommendations for medications that have not received regulatory approval ("off-label" use of medication)	<input type="radio"/> Yes <input type="radio"/> No	You must declare all off-label use to the audience during your presentation.
I acknowledge that the <a href="#">National Standard</a> requires that any description of therapeutic options utilize generic names (or both generic and trade names) and do not reflect exclusivity and branding.	<input type="radio"/> Yes <input type="radio"/> No	Failure to do this is a violation of the National Standard.

☐ I Agree

By clicking "I agree" you are acknowledging that the above information is accurate and that you understand that this information will be publicly available.

Name:

Date:



## Appendix B: Conflict of Interest (COI) Management at UBC CPD

Note: these instructions have been developed by UBC CPD for internal use. Other organizations are welcome to use these instructions as a guide for managing conflict of interest disclosures.

### Instructions

#### STEP 1: Collect information

- ✓ Collect the UBC CPD COI disclosure form:
  - for every Scientific Planning Committee (SPC) member as the committee is being formed
  - for every content contributor (presenters, facilitators, authors etc.) as soon as they are identified

Assign to: Staff or SPC member

#### STEP 2: Exclude HPI owners/employees

- ✓ Identify any owners or employees of **healthcare/pharmaceutical industry commercial interests** (HPIs; see definition below) → Exclude these individuals

*Per the National Standard and the UBC CPD Ethical Standards for Accreditation, HPI owners and employees cannot serve as SPC members or content contributors.*

Assign to: SPC chair or staff manager (use UBC CPD Ethical Standards for Accreditation for guidance)

#### STEP 3: Determine if the relationship is relevant

- ✓ Review any disclosed relationships → are they relevant to the CPD activity?

Assign to: SPC / SPC chair (use UBC CPD Ethical Standards for Accreditation for guidance)

#### STEP 4: Mitigate relationship

- ✓ For any relevant relationships → mitigate potential impact on the CPD activity.

Assign to: SPC / SPC chair (use UBC CPD Ethical Standards for Accreditation for guidance)

#### STEP 5: Inform learners

- ✓ For each SPC member and content contributor, inform learners of all disclosed relationships, where applicable, and describe the mitigation strategy.

Assign to: Staff or SPC member (use UBC CPD Ethical Standards for Accreditation for guidance)



#### STEP 6: Check content for bias

- ✓ Where feasible, check content for indications of bias *before* it is made available to learners.

Assign to: Staff or SPC member (use [UBC CPD Ethical Standards for Accreditation](#) for guidance)

#### STEP 7: If bias is detected, inform and take appropriate action where necessary

On occasion, bias may be detected by learners or others *after* content is available to learners.

- ✓ Ensure responses to the evaluation question regarding bias is reviewed
- ✓ Share information regarding detection of bias with the SPC and UBC CPD Accreditation team.
- ✓ SPC and UBC CPD Accreditation team review information regarding bias. If a serious issue is detected and/or the CPD activity is found to be non-compliant, take appropriate action. Actions may include:
  - a. in cases of non-compliance, follow **UBC CPD Non-Compliance procedures**
  - b. inform content contributors\* and/or remove/update content
  - c. inform learners\*
  - d. inform those who detected bias (when known)\*
  - e. SPC debrief to inform future CPD activities
  - f. update content contributor records to inform future CPD activities

\*For any external communication, consult with UBC CPD Communications team.



## Appendix C: UBC CPD Non-compliance Procedure

### Background and Context

Both the National Standard and the UBC CPD Ethical Standards for Accreditation require the responsible Scientific Planning Committee to have a process in place to deal with instances where CPD activities are not compliant with required standards.

The document below outlines the role of the scientific planning committee (SPC) in identifying non-compliance and the steps UBC CPD will take as the accredited provider when non-compliance is identified. These procedures are in place for the CPD activities in which UBC CPD has direct involvement in terms of development and provision and/or accreditation. The procedures outlined in the document will be put into action in a manner consistent with the seriousness of the contravention.

### Identifying non-compliance: Scientific Planning Committee Role

The scientific planning committee (SPC) has an important role in identifying non-compliance. To enable this:

- A. All SPC members must be familiar with the UBC CPD Ethical Standards for Accreditation (based on the National Standard).
- B. All SPC members must be aware of the disclosed financial relationships and any mitigation strategies of the other SPC members and content contributors.
- C. All commercial sponsors of an accredited/certified activity must have signed an agreement with the physician organization outlining the commercial sponsorship opportunities permitted for that event (table in exhibit hall, number of representatives attending, etc.).

If either the SPC or UBC CPD identify that the SPC members, content contributors, commercial sponsors or any aspect of the CPD activity is not compliant with the UBC CPD Ethical Standards for Accreditation, the below procedures should be followed.

#### *Is the CPD activity a UBC activity?*

*As UBC CPD is only able to certify Mainpro+ CPD activities for UBC activities, it can be assumed that any Mainpro+ certified activity is a UBC activity.*

*For CPD activities certified as MOC only, any activities for which a UBC Faculty of Medicine Department is the physician organization are UBC activities. All others are non-UBC activities.*





## Non-compliance procedure: UBC Faculty of Medicine Activities

- I. The SPC must notify the UBC CPD Accreditation team.
- II. The SPC may decide to address any issue of non-compliance internally or with the individual or company directly at the time of the initial infraction. The SPC must notify the UBC CPD accreditation team of any steps taken as well as the outcome.
- III. Upon becoming aware of non-compliance, either through the SPC or other means, the UBC CPD Accreditation team will consider the seriousness of any contravention as well as any steps taken by the SPC to address the issue. Often, the contravention will be resolved through direct communication with the SPC.
- IV. On occasion and when deemed necessary, the UBC CPD Accreditation team will:
  - a. Issue a written warning to the accountable UBC FoM Department, who must provide evidence of amendments and respond to the warning with details on how they will take steps to ensure compliance.
  - b. Make a referral made to any or all of the following: UBC CPD Accreditation Council, UBC CPD Advisory Council, UBC Faculty of Medicine Department Heads, the UBC Faculty of Medicine Dean's Office, Royal College of Physicians and Surgeons of Canada and the College of Family Physicians of Canada in order to determine the appropriate action, which may include but not be limited to one or more of the following:
    - i. Revoking accreditation/certification (i.e. attendees cannot claim credits for participation);
    - ii. A one-year suspension, during which time no new activities may be submitted for accreditation/certification;
    - iii. A three-year tracking process during which the program is monitored and audited to observe whether the necessary changes are taking place and there is full compliance.

## Non-compliance for non-UBC Activities

*UBC CPD accredits activities for Royal College MOC credits nationally. Activities approved for MOC credits by UBC CPD are considered non-UBC activities when the physician organization is not a UBC FoM Department.*

- I. The SPC must notify the UBC CPD Accreditation team.
- II. The SPC may decide to address any issue of non-compliance internally, or with the individual or company directly at the time of the initial infraction. The SPC must notify the UBC CPD accreditation team of any steps taken as well as the outcome.
- III. Upon becoming aware of non-compliance, either through the SPC or other means, the UBC CPD Accreditation team will consider the seriousness of any contravention as well as any steps taken by the SPC to address the issue. Often, the contravention will be resolved through direct communication with the SPC.



- IV. On occasion and when deemed necessary, the UBC CPD Accreditation team will:
- a. Issue a written warning to the physician organization who must provide evidence of amendments and respond to the warning with details on how they will take steps to ensure compliance.
  - b. Discuss the case with the Royal College of Physicians and Surgeons of Canada in order to determine the appropriate action, which may include but not be limited to one or more of the following:
    - i. Revoking accreditation (i.e. attendees cannot claim credits for participation);
    - ii. Undetermined suspension, during which time no new activities may be submitted for accreditation;
    - iii. A three-year tracking process during which the program is monitored and audited to observe whether the necessary changes are taking place and there is full compliance with UBC CPD guidelines;
    - iv. A written complaint submitted about the organization to their larger body (if applicable) that has ethical codes of practice;
    - v. A written complaint submitted about the organization to the other University CPD provider Offices across Canada and relevant National Speciality Societies.

## References

Canadian Medical Association. (2021-08-21). Guidelines for Physicians in Interactions with Industry. <https://policybase.cma.ca/link/policy14454>

Royal College of Physician and Surgeons of Canada. (2018). *National Standard for Support of Accredited CPD Activities*. [royalcollege.ca/rcsite/cpd/providers/tools-resources-accredited-cpd-providers/national-standard-accredited-cpd-activities-e](https://royalcollege.ca/rcsite/cpd/providers/tools-resources-accredited-cpd-providers/national-standard-accredited-cpd-activities-e)