



## UBC CPD POLICY ON CONFLICT OF INTEREST DISCLOSURE

The Division of UBC Continuing Professional Development (UBC CPD) adheres to the 2007 Canadian Medical Association (CMA) Guidelines for Physicians in Interactions with Industry<sup>1</sup> which state that “Those physicians with ties to industry have an obligation to disclose those ties in any situation where they could reasonably be perceived as having the potential to influence their judgment.” and “There should be a procedure to manage conflicts once they are disclosed.” In addition, in order to meet the requirements of all the organizations for which we are accredited providers, UBC CPD must also adhere to their standards on disclosure of conflict of interest<sup>2</sup>. UBC CPD must also adhere to the guidelines set by UBC University Counsel “Conflict of Interest and Conflict of Commitment - Policy 97”<sup>3</sup>. UBC CPD has for several years required CPD program planners and presenters to disclose conflicts of interest (COI) and has provided a disclosure form to facilitate this process. However, there are new standards for COI disclosure necessitating updating of our disclosure form and process to meet current COI disclosure requirements.

A conflict of interest may occur in situations where the personal and professional interests of individuals may have actual, potential, or apparent influence over their judgment and actions (Royal College Declaration of Conflict of Interest). Conflicts and potential COIs are inevitable; rare is the CPD planner/speaker who does not have at least one such conflict. A COI is not the same as bias; one can have a COI and still produce an unbiased CPD program/presentation. Conversely, one may have no identifiable COIs, but be very biased. An example of the latter would be an opinionated speaker who, while not having any financial relationships with industry, is wedded to one treatment option and discounts all others in spite of plausible evidence to the contrary.

Conflicts of interest may occur not only with industry, but also with government, regulatory bodies, and not-for profit organizations

### WHO MUST DISCLOSE:

All members of the planning committee for a program or event and all individual speakers, chairs and facilitators must disclose conflicts of interest for the two year period prior to a CME/CPD activity. Authors of any printed or web-based CME/CPD content must also disclose COIs.

### WHAT TO DISCLOSE:

**A. Relationships with industry, including pharmaceutical, medical device, nutritional, health care product, and medical communication companies (whether or not directly related to content presented)**

- Ownership interest in a company (i.e. stocks, stock options, or other ownership interest, excluding diversified mutual funds)
- Membership on the company’s Advisory Board or similar committee



- Membership in a Speaker's Bureau
  - Research grants and funding from industry
  - Involvement in the design of clinical studies using products mentioned in the presentation or competing products to those that will be mentioned
  - Current or recent (past 2 years) participation in clinical trials and name of sponsor(s) (includes pre- and post-marketing trials)
  - Honorarium, consulting fees, salary, grant-in-aid ("restricted" or "unrestricted") or other monetary or in-kind support received from industry in the past 2 years or expected in the future
  - Ownership of a patent for a product referred to in the presentation or marketed by a company that produces a product mentioned in the presentation
  - Any other ties, financial or otherwise, that should they become known, might give rise to the perception of a conflict of interest (e.g.. consultancy work or advisory role for industry, etc)
- B. Ownership or any other interest in a clinic or other private companies (related to the content presented)**
- C. Commercial affiliation that your spouse or close family members have with respect to information being presented in a CMECPD activity**
- D. Relationships with government agencies, regulatory bodies, and not-for-profit agencies (related to the content presented)**
- All of the requirements for disclosure of relationships, financial and otherwise, with industry such as honoraria, membership on Boards, research grants, etc. apply to government, regulatory, and not-for-profit agencies.
- E. Speakers must disclose which, if any, of their slides were produced by a third party (industry or medical communications company)**

**HOW TO DISCLOSE:****A. For program organizers:**

- The Chair of the planning committee must disclose to the CPD Office or designate as soon as feasible after agreeing to chair the committee.



- Planning committee members must disclose to the Chair or designate prior to or at the first meeting.
- Speakers must disclose conflicts of interest to the program organizers or planning committee as soon as feasible following confirmation of their participation in the educational activity. Any slides to be used in the presentation that were produced by a third party must be disclosed and forwarded for review at least 2 weeks prior to the event.
- Disclosure should be in writing using the form provided by UBC CPD.

**B. For program participants:**

- Disclosures of planning committee members, chairs and facilitators will be included in the program hand-out/syllabus. In the case of a web-based program, disclosures will be included in the information/hand-outs provided to participants or clearly provided by a link on the first webpage.
- Speaker disclosures will be included in the program hand-out/syllabus if provided and must be disclosed and addressed by the speaker on a slide(s) at the beginning of the presentation. In the case of a web-based program, speaker disclosure should be clearly provided either directly or by a link on the first webpage. Slides listing many companies and a declaration along the lines of “I receive money from all the companies so I have no conflict” should be avoided as this may suggest to the audience that the speaker does not take the issue of conflict of interest seriously. It might be more appropriate and accurate to state that:  
“I receive money from several companies in this field because...
  - ... I feel that all the products involved have merit in selected cases
  - ...I need this money to do my research and always try to avoid influence by any one company
  - ... other (thoughtful statement)

It would also be important to outline the specific nature of any potential conflicts indicated. The vast majority of physicians are ethical practitioners who strive to follow ethical principles; therefore their conflict of interest statements should reflect this fact.

Conflict of Interest disclosure is now a requirement across North America, so that those who accept to speak or be on planning committees for a CPD event are generally aware that they will be expected to disclose. Failure to provide requested disclosure information should be an extremely rare event, if it occurs at all. No planning committee member will be allowed to continue on the committee after the first meeting without having signed the Declaration of Conflict of Interest. Similarly, no speaker will be allowed to give their presentation without having signed the Declaration of Conflict of Interest.



Failure of a speaker to disclose or false disclosure may require the planning committee to replace the speaker. Should it come to the awareness of the planning committee or of the CPD Office after the fact that a speaker or planning committee member has failed to disclose a significant conflict of interest, that information will be provided to the program participants. As well, if a COI disclosure slide has not been included in a presentation, it will be inserted by the program organizer.

### **MANAGEMENT OF CONFLICTS OF INTEREST**

As indicated earlier, conflicts of interest are inevitable and do not necessarily imply bias. Speakers and planning committee members are being asked directly to manage any self identified potential conflicts of interest that might be perceived as creating bias. As required, the program Chair, in consultation with the CPD Office or designate will determine how to manage any identified conflict of interest. Conflict of interest management may be carried out in one of the following ways:

- In many cases, ensuring that the conflict is fully disclosed to program participants will be adequate management
- The speaker is asked to speak on a different subject
- The speaker or planning committee member alters their financial relationship
- The planning committee member relinquishes control of content of the program or presentation
- Independent expert content review is obtained
- On rare occasions, a speaker or planning committee member may need to be replaced

### **SCOPE OF THE POLICY**

This conflict of interest disclosure policy will apply to all UBC CPD sponsored and co-sponsored activities. UBC CPD will also encourage the adoption of this policy by programs that are submitted to it for Royal College of Canada Maintenance of Certification or College of Family Physicians of Canada Mainpro study credits.

<sup>1</sup> <http://policybase.cma.ca/dbtw-wpd/Policypdf/PD08-01.pdf>

<sup>2</sup> [http://rcpsc.medical.org/opa/moc-accreditation/accred-toolkit/COI-Disclosure-Form\\_e.pdf](http://rcpsc.medical.org/opa/moc-accreditation/accred-toolkit/COI-Disclosure-Form_e.pdf)

<sup>3</sup> <http://universitycounsel.sites.olt.ubc.ca/files/2010/08/policy97.pdf>