1.0 PURPOSE

1.1 To ensure the content of all educational activities and related materials developed, co-developed and accredited by the CPD Medicine Program Program provide balance, independence, objectivity, and scientific rigor and meet accepted professional, ethical and legal standards.

1.2 To ensure each activity is being planned, delivered, and evaluated in accordance with the national standards developed by the Royal College of Physicians and Surgeons of Canada and the College of Family Physicians of Canada.

1.3 To assist educational event planners, speakers and authors in recognizing Conflicts of Interest (COI) and provide procedures to ensure that COI’s are properly disclosed and managed.

2.0 POLICY

2.1 All persons involved in planning and production of CPD Medicine Program sponsored activities will disclose any and all potential conflicts of interest and resolve them prior to participation in the educational activity.

3.0 DEFINITIONS

3.1 “Conflict of Interest (COI)” means a situation in which the private interests (Financial Interests or Personal Interests) of a Person or Related Party compromise or have the appearance of compromising the Person's independence and objectivity of judgment in the performance of his or her obligations related to CPD Medicine Program Program educational activities. Conflicts of Interest can be potential, actual or perceived.
3.2 “Commercial Interest” is any proprietary entity producing health care goods or services, with the exemption of non-profit or government organizations and non-health care related companies.

3.3 “Financial Interest” are those relationships within the past 24 months in which the individual (or his or her partner/spouse or immediate family member) benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit in any amount. Financial benefits are usually associated with roles such as employment, a managerial position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received or expected.

4.0 PROCEDURES

4.1 The process for ensuring compliance with this policy applies a multi-step approach including prevention, surveillance, and monitoring/evaluation. The steps for each area are described below.

4.2 Prevention:

4.2.1 All individuals who are involved with planning or delivery of educational activities must sign conflict of interest disclosure forms prior to their involvement with the activity. All relevant financial relationships with any commercial interest must be disclosed. Individuals subject to this requirement include, but are not limited to, activity course directors and program chairs, planning committee members, faculty, speakers, presenters, authors and editors, expert reviewers, moderators, and panel members. This disclosure must be provided in writing on the standardized Conflict of Interest Disclosure Form (Appendix A).

4.2.2 An individual who does not disclose relevant financial relationships may not participate as a developer, planner or instructor of a CPD Medicine Program sponsored educational activity.

4.2.3 Relevant financial relationships must be disclosed to learners prior to the continuing medical education activity. Information provided in this manner includes the name of the individual, the name of the commercial interest, and the nature of the relationship the person has with each commercial interest.
Information that an individual has no relevant financial relationship must also be disclosed in advance to the learning audience.

4.2.4 All faculty involved with planning or instructing who disclose a conflict of interest must resolve that conflict prior to the educational activity. Appropriate mechanisms for resolution will be identified by the planning committee and can include the following:

4.2.5 **Altering financial relationships.** Individuals may change their relationships with commercial interests (e.g., discontinue contracted services), thereby eliminating any bias into the educational content.

4.2.6 **Altering control over content.** An individual’s control of educational content may be altered in several ways to remove the opportunity to affect content related to the products and services of a commercial interest. These include the following:

   a) Choosing someone else to control that part of the content. If a proposed presenter or planner has a conflict of interest related to the content, someone else who does not have a relationship to the commercial interests related to the content may present or plan this part of the content.

   b) Change the focus of the educational activity so that the content is not about products or services of the commercial interest that is the basis of the conflict of interest.

   c) Change the content of the person’s assignment so that it is no longer about products or services of the commercial interest. For example, an individual with a conflict of interest regarding products for treatment of a condition could address the pathophysiology or diagnosis of the condition, rather than therapeutics.

   d) Limit the content to a report without recommendations. If an individual has been funded by a commercial company to perform research, the individual’s presentation may be limited to the data and results of the research. Someone
else can be assigned to address broader implications and recommendations.

e) Limit the sources for recommendations. Rather than having a person with a conflict of interest present personal recommendations or personally select the evidence to be presented, limit the role of the person to reporting recommendations based on formal structured reviews of the literature with the inclusion and exclusion criteria stated (‘evidence-based’). For example, the individual could present summaries from the systematic reviews of the Cochrane Collaboration.

4.2.7 **Independent Content Validation:** Conflict of interest may be resolved if the educational material is reviewed by a member of the scientific planning committee and:

a) All the recommendations involving clinical medicine are based on evidence that is accepted within the profession of medicine as adequate justification for indications and contraindications in the care of patients.

b) All scientific research referred to, reported or used in the educational activity in support or justification of patient care recommendations conforms to the generally accepted standards of experimental design, data collection and analysis.

4.2.8 Additional information may be requested to assist in resolution of conflict of interest. Resolution of the conflict of interest must also be disclosed to the audience in advance stating: “All conflicts of interest have been resolved in accordance with the Continuing Professional Development Medicine Program’s CONFLICT OF INTEREST POLICY”.

4.2.9 If a COI cannot be resolved through the mechanisms above, program accreditation will not be provided.

4.3 **Surveillance:**

4.3.1 As part of the activity review and approval process, the CPD Medicine Program will make a recommendation as to the need for an onsite review/audit of a given activity. Factors for making
such a determination may include: jointly sponsored activity, a history of perceived bias if a repeat activity, high percent of faculty with identified COI, high levels of commercial support or single source commercial support.

4.4 **Evaluation/Monitoring:**

4.4.1 Educational activity participants **must** be surveyed about perceived commercial bias as part of the post-activity evaluation. Indications in significant amounts of bias in a presentation or in the overall activity will trigger a retroactive review of all materials presented to the participants, discussion with the program director and/or event planning committee.

4.4.2 Significant variation from initially approved sessions may affect future requests for accreditation and individuals whose ratings consistently indicate the presence of bias may be precluded from future activity planning or presentation.

**References and Related Documents:**


4) The College of Family Physicians of Canada: *Conflict of Interest Form*, found at: [http://www.cfpc.ca/Conflict_of_Interest_Form/](http://www.cfpc.ca/Conflict_of_Interest_Form/)

Name: 
Name of activity:  
Date of activity: 

Check any commercial, financial, or research relationships or interests within the past 24 months that **you, your spouse, or an immediate member of your family**, that could be perceived as a related or apparent conflict of interest in the contract of the subject of the proposed CME/CPD activity.

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OR

☐ **I have no relationships to disclose**

I confirm that all of the above information is a complete and accurate listing of my relevant personal and financial interests and agree to abide by the CPD Medicine Program’s Policy on **Conflict of Interest**.

Signature: _______________________________ Date: __________________

Please send to  CPD.Medicine@umanitoba.ca or fax to 789-3911

**Conflict of Interest Resolution** *(For use of CPD Medicine Program Office or Chair, Scientific Planning Committee)*

(A) No conflict of interest:

(B) Conflict of interest managed by: ______________________________

(C) Conflict unable to be resolved, speaker cancelled:

Signature: _______________________________ Role: ___________________ Date ___________