

Introductory Comments

The new Max Rady College of Medicine **Policy on Interactions with Health-Related Industries** was approved by College Executive Council on October 12, 2016 and comes into effect on January 1, 2017.

Our goal has been to provide some structure to interactions with health related Industries that **respects and values** this important partnership while **safeguarding** against the impression of undue influence on College faculty, staff, students and trainees.

HIGHLIGHTS

Here are some **highlights** of important changes or new emphases compared with the 2011 policy. Further educational materials about the new policy will be forthcoming. Your questions can be sent to industrypolicy@umanitoba.ca

- Applies only to health-related industries, not other commercial entities
- Applies to all "Persons" under the umbrella of the College, and to close family members for conflict of interest declarations
- Interactions with Industry are viewed as important and beneficial to the University. College members are welcome to meet with representatives of Industry, generally outside of patient care areas
- The following will be, or will remain prohibited:
 - o Receipt of all gifts, large and small, including gifts of food and drink
 - o Industry support for regularly scheduled series (rounds, journal clubs) and for hospitality components of resident or student retreats
 - o Participation in learning programs/CPD events that receive Industry support that are held in restaurants and lounges
- A registration fee of at least \$25.00 per credit hour must be charged to practicing physicians for attendance at accredited CPD events that receive Industry support
- Registrants must pay for the full cost of food and drink provided at unaccredited learning programs/CPD events supported by Industry
- Consulting and speaking relationships with Industry require written contracts that are specific regarding deliverables and that have a defined term and are approved by the Department Head
- Student/trainee interactions with Industry must be mentored and monitored by a faculty member
- Relationships with Industry must be disclosed by faculty to learners in undergraduate, postgraduate and CPD settings
- Written agreements are required for all financial and in-kind support received from Industry and must be approved by the Department Head. These funds must be held separately from other sources of funding.

- Faculty disclosures of financial and other relationships with health-related industries must be made to the Department Head or Supervisor at time of hiring, and thereafter as such relationships arise.
- Concerns about breaches of the policy should be brought to the Department Head’s attention for review and action.

Many thanks to our working group for all their hard work over the last year: Drs. Jack McPherson, Dan Roberts, Jose Francois, Don Klassen and Peter Nickerson, with input from Dr. Samantha Kelleher, Kristjan Thompson (PARIM) and Amanda Donahue (MMSA). We received input from over 50 members of the College in our round of consultations in late 2015, and from Innovations Medicines Canada (Rx&D), the WRHA and other external organizations. All feedback provided has been earnestly considered in this final version.

Any questions about the policy can be communicated by email to industrypolicy@umanitoba.ca or to me personally.

Dr. Jeff Sisler
 Vice-Dean, Office of Continuing Competency and Assessment
 Rady Faculty of Health Sciences

Policy:	Interactions between the Max Rady College of Medicine and Health-Related Industries
Effective Date:	January 1, 2017
Revised Date:	
Review Date:	January 1, 2010
Approving Body:	Max Rady College of Medicine Executive Council October 12, 2016

1.0 Background

The Max Rady College of Medicine (the "College") of the Faculty of Health Sciences strives to service the healthcare needs of the people of Manitoba and beyond; improving health and patient care through partnerships, leadership and innovation in medical education, research, clinical practice and community engagement.

This mission requires that College members interact with representatives of the pharmaceutical industry and with representatives of companies in the fields of pharmaceuticals, biotechnology, medical devices, health information technology, hospital and research equipment, and health care supply and services (“Industry”). Interactions with Industry occur in a variety of contexts, including marketing of new pharmaceutical products, medical devices and/or equipment; on-site training for newly purchased devices; educational support of medical students, residents, graduate students, and practitioners; and in the support of research activities including clinical trials and scholarly publication.

Interactions with Industry are important and can be beneficial to the University. They help ensure timely and broad access to medical advances and new technologies and to clinical trials that are industry-initiated.

Collaboration with industry is also essential to the development of new diagnostic and therapeutic products, devices and technology. However, these interactions must avoid any actual, potential or perceived conflicts of interest that may affect the integrity of the College's education, training and research programs, or the reputation of either the College member or the College itself.

This policy is intended to provide a set of guiding principles that College faculty, staff, students, and trainees will use to ensure that their interactions result in optimal benefit to clinical care, education and research, and that maintain the public trust.

This policy is meant to be consistent and compliant with the University of Manitoba *Conflict of Interest Policy* and the *Gifts and Gratuities Offered to University Employees Policy*. Where any portion of this policy conflicts with these University policies, the latter will govern. Where this policy is silent on a matter, University policies shall govern the matter.

2.0 Definitions

Industry: Representatives of pharmaceutical, biotechnology, medical device, health information technology, hospital and research equipment, and health care supply and service companies, that are doing or seeking to do business with Persons affiliated with the Max Rady College of Medicine. This applies also to representatives of companies acting on behalf of the above. This definition does not include commercial entities in other sectors, such as financial services, nor does it include private medical corporations or charitable foundations.

Person: A Person is defined as individuals included in at least one of the following categories:

(A) An individual who falls into one of the categories defined in the University's Procedure entitled "Employee Organizations and Employment Groups," as an "employee" of the Max Rady College of Medicine, including:

- (a) Academic and Support Staff Excluded from Bargaining Units as Members of the Board;
- (b) Executive Staff;
- (c) Senior Administrative Academic Staff;
- (d) Administrative Academic Staff;
- (e) GFT Staff;
- (f) Research Academic Staff;
- (g) Other Academic Staff;
- (h) Sessional Professional Academic Staff;
- (i) Excluded Management, Administrative and Professional Staff;

(B) An individual with an academic appointment in the College, commonly called a faculty member, including those with nil-salaried and emeriti appointments.

(C) A post-doctoral fellow or clinical postgraduate trainee, a graduate or undergraduate student, a visiting student, or a visiting scientist;

(D) Any other individual, such as an independent contractor, involved in any activity under the auspices of the University.

Related Party: Any individual with whom a Person shares a financial interest or personal interest, either directly or indirectly. This includes a Person's immediate family, household members or dependents.

Conflict of Interest (COI): A situation in which the private interests (financial or personal) of a Person or Related Party compromise, or have the appearance of compromising, or have the potential to compromise a Person's independence and objectivity of judgment in the performance of his or her obligations to the University. This includes teaching, research and service activities, including clinical care.

Gifts: Items of any value that are given

- **By** a business or individual that does, or seeks to do, business with the Max Rady College of Medicine or Persons affiliated with it
- **To** a Person or Related Party and for which the recipient neither paid nor provided services.

This includes, but is not limited to, items such as food, drink, pens, textbooks, electronic media, gift certificates, tickets to sports or cultural events, devices, products or services, travel, hotel accommodations, entertainment, research equipment or funding, and payments for attending a meeting.

3.0 Interactions with Industry

3.1 Preamble

Interactions with Industry are important and can be beneficial to the College. This policy is not intended to inhibit such interactions, but to ensure transparency in these relationships, the absence of undue influence, and to ensure that real or potential conflicts of interest are managed in the best interests of the College and its members.

The College benefits from financial and in-kind support provided by Industry in a variety of forms. Such support must always be governed by a written agreement with the University that stipulates the intended use of the support, and which is transparent to both parties and, when required, to the public. These funds or donated products must be provided to the College, to an individual Department, or to an account held by a Regional Health Authority, and not be held by an individual Person. Departments or Units within the College must ensure that these monies are held separately from other funds to ensure compliance with the standards that follow.

Faculty members must ensure that all industry-derived funding intended for individuals or groups is administered through project-specific accounts at the University of Manitoba or at an affiliated institute, Centre, or hospital. The Max Rady College of Medicine requires that all affiliated institutes, Centres and hospitals must provide statements that disclose all expenditures, transfers and transactions from these accounts to the Department Head of the principal investigator on a regular basis, as determined by the Department.

Persons affiliated with the College also participate in a variety of external professional organizations and societies. Because the status that accompanies affiliation with the College is an inseparable element of such involvement, Persons are held to these same standards in those activities.

3.2 Gifts

Persons shall not accept Gifts (as defined in Section 2.0) from representatives of Industry regardless of their nature or value. This includes gifts of food and drink.

3.3 Food, Drink and Social Events

3.3.1 In the Context of Continuing Professional Development

Continuing Professional Development (CPD) programs are those educational events, activities and conferences designed primarily to address the learning needs of practicing physicians and other health providers. While the main concern of this policy are those events offered in Manitoba in which Persons act as members of scientific planning committees, speakers, moderators or attendees, Persons are expected to behave in a manner consistent with the principles of this policy when attending programs outside of Manitoba.

Persons are permitted to participate in accredited or unaccredited CPD programs that receive financial support from Industry. Such programs may be held on- or off-campus, but must not be held in a restaurant or lounge, including those located in private clubs.

Accredited CPD Programs Receiving Industry Support

- A registration fee must be charged to practicing physicians attending a CPD event accredited by the Royal College of Physicians and Surgeons, the College of Family Physicians of Canada, or by accrediting bodies in other countries, which receives support from Industry in the form of sponsorship or exhibitor fees. A minimum fee will be set from time to time by the College, and in 2016-17 will be **\$25.00 per hour** of accredited learning. Support from Industry is helpful to defray the costs of these events and reduce the cost of registration, but a fee is required in order to avoid a perceived or real influence on educational content and to cover hospitality costs.

Unaccredited Learning Activities Receiving Industry Support

- Persons may participate in learning activities, programs and conferences that are unaccredited, but must pay the full cost of any food and drink provided. Organizers are expected to offer registration systems that facilitate such payment by attendees.
- It is expected that speakers and moderators would receive their food and drink as part of the written agreement governing their compensation for involvement in the event.

3.3.2 In the Context of Regularly Scheduled Series (i.e. Journal Clubs)

Food and drink provided at regularly scheduled series (Grand and Section Rounds, Quality Assurance Rounds, Journal Clubs, etc) must not be purchased with funds provided directly or indirectly by Industry. These events are viewed as part of the academic mission of the University and commonly are key learning events for postgraduate, graduate and undergraduate learners.

3.3.3 In the Context of Visiting Professors

In Visiting Professor events, experts from outside Manitoba share their insights and knowledge in the course of Rounds, workshops and other educational events. These are organized under the auspices of a Department or Section or Program in the College. The control of content, planning and budget rests with that Unit. Funds may be received from Industry in support of Visiting Professor events that are governed by a written agreement as stipulated in 3.1. As part of the hospitality extended to visiting professors, a social event in

honour of the visitor may be paid for from such funds for three University faculty members and the visiting professor, similar to the guideline for faculty recruitment visits.

3.3.4 Social Events

Persons may not accept free admission to receptions, dinners, sporting or cultural events from Industry. This applies both to stand-alone hospitality events and to those associated with a conference or educational program. Attendance is permitted at dinners and social events associated with a conference or other education event when admission is restricted to persons purchasing tickets or paying registration fees for the conference or event.

Social events at educational programs supported by Industry must not compete with nor take precedence over the educational elements. In general, such arrangements should be in keeping with those that would normally be made without such sponsorship.

3.3.5 In the Context of Procurement Contracts

Persons may accept food, drink, and travel related expenses provided in the context of contracts with Industry for medical devices, equipment and other technologies. Such benefits must be stipulated in the contract and be provided in the context of educational and programs designed to ensure that Persons acquire the skills and knowledge necessary to safely and effectively use such devices or equipment.

3.4 Speaking, Moderating and Consulting Relationships

When Persons are engaged by Industry for consulting or speaking services, including service on advisory boards, a contract must be provided that includes specific tasks and deliverables and identifies payments commensurate with the tasks assigned. These agreements must link deliverables and payments to specific scheduled or planned events or projects to be completed within a specified term.

Contracts between Persons or Units of the College and Industry must be reviewed in a timely fashion by the Department Head or, in a matter affecting the Department Head, by the Dean. The Department Head may require Persons to request changes to the terms of such contracts to bring them into compliance with University and/or Max Rady College of Medicine policies before approving them.

The Department Head may decline approval of a Person's request for Industry engagement if the proposed conditions including duties and time commitments are deemed likely to interfere with the Person's duties and responsibilities to the Department and/or the College.

When Persons are engaged in the commercialization of new technologies through partnership or ownership, more latitude may be allowed, in discussion with the Department Head, to facilitate the Person's role in ensuring the success of the venture.

While receiving compensation is acceptable for providing substantial professional services, Persons may not accept compensation unless the individual has played a substantial role. Individuals shall not accept compensation in exchange for listening to a promotional talk, for attending a continuing education event, or for any other activity in which the attendee has no other role except that of a participant.

3.4.1 Speakers or Moderators

Persons engaged by Industry as speakers or moderators of scientific sessions must comply with the following conditions:

- They must have recognized expertise in the topic area.

- They must prepare the content of their talks themselves.
- They must provide a fair and balanced discussion of the current evidence and treatment options.
- They or the sponsor must disclose the fact of financial support to the participants.

3.4.2 Consultants

Persons engaged by Industry as consultants, including membership on advisory boards, must have recognized expertise related to the services being purchased. These services may include scientific, medical, technical or methodological advice or the preparation of educational programs. They must comply with the following conditions:

- Purchased services cannot include deliberations or activities directly related to the marketing of products.
- Persons asked by government, regional health authorities, hospitals or the Max Rady College of Medicine to provide advice or to participate in deliberations relevant to the selection, evaluation and or purchase of drugs or devices must disclose all Industry compensation within the previous two years, or other time period stipulated by the purchasing organization.
- Compensation must be consistent with schedules provided in Appendix A.

3.5 Drug, Instrument and Device Samples and Patient Educational Materials

Persons should utilize clinical evaluation packages (drug samples), instrument and device samples and patient educational materials only within the policies and procedures established by the relevant healthcare facility or regional health authority. They are expected to ensure that the distribution and clinical use of these samples and materials is consistent with established ‘best practices’ and should utilize samples only when appropriate and within the standards of care in Manitoba. Written agreements are generally not needed to govern these samples and materials.

3.6 Access by Industry Representatives

Industry representatives are welcome to meet with Persons affiliated with the College in all non-patient care areas, usually on an appointment basis. All interactions between students or trainees and Industry representatives must be mentored and monitored by a faculty member.

There are circumstances in which it is helpful to have Industry representatives present in a clinical care or educational setting, such as an operating suite and a simulation facility, respectively. This access will be governed by relevant site policies and procedures, and should ensure that such interaction is focused on education and training for staff and trainees, and not include promotional activity.

3.7 Support for Undergraduate, Graduate and Postgraduate Educational Programs and Retreats

Support may be accepted from Industry or related entities for resident or student academic days, retreats, meetings or similar events. However, such support can only be used for educational aspects of the event (speaker fees, printing, learning materials, audiovisual costs etc) and not for food, drink, lodging, social events or other hospitality aspects. Student interactions with Industry representatives must be mentored and monitored by a faculty member.

Support by Industry that is provided for undergraduate, graduate and postgraduate educational programs in the form of funding or a donated product must be free of any actual or perceived Conflict of Interest. It must be governed by a written agreement that stipulates the intended use of the support. This also applies to support received from educational companies or other entities that act as intermediaries for Industry.

Such written agreements must receive prior approval by the Department Head or appropriate Associate Dean, or in the case of agreements concluded by a Department Head or an Associate Dean, by the Dean. The Department Head or Associate Dean may require Persons to request changes to the terms of such agreements to bring them into compliance with University and/or Max Rady College of Medicine policies.

3.8 Support for Continuing Professional Development (CPD)

Industry support for CPD programs must be free of any actual or perceived conflict of interest and must be provided to the Max Rady College of Medicine, to one of its Education Programs, or to an individual Department, and not to an individual Person. Such support must conform to the *CPD Commercial Support Policy* which provides a fuller description, and is also addressed in Section 3.3.1 of this policy.

Grants to fund CPD programs must be governed by written agreements with the University that stipulate the intended use of the support and that are completed prior to the event occurring. Such agreements should be in a format acceptable to the University. Funds that are provided by educational groups or other entities that act as intermediaries for Industry such as medical education companies must be managed in the same way. Financial support specifically designated for hospitality is not permitted.

Every accredited CPD program must have a scientific planning committee. It may consider data or advice from all sources, but must ensure that it has exclusive control of all decision-making related to the activity, including:

- identification of educational needs, topics and learning objectives
- selection of educational methods
- selection and recruitment of speakers, facilitators and authors
- gathering and managing Conflict of Interest declarations
- development and delivery of content
- evaluation of the activity and of the participants' perception of balance and bias
- accountability for and oversight of all financial aspects of the activity, including payment of honoraria and expenses for speakers and planning committee members (if applicable) and for all food and drink

Industry representatives, or organizations hired by Industry must not participate in the activities of scientific planning committees. Honoraria amounts must comply with the schedule in Appendix A.

Commercial exhibits intended to present Industry products are welcome and must comply with the *CPD Policy on Commercial Exhibits*. Industry representatives who are sponsoring and/or exhibiting may attend the CPD program, but may not speak during question and answer periods or engage in sales activities in the room where the educational activity takes place.

3.9 Scholarships or Other Educational Funds for Students and Trainees

Industry support for students' and trainees' participation in education programs and conferences must be free of any actual, potential or perceived Conflict of Interest. All financial support for students and trainees must be specifically for the purposes of education and must comply with the following requirements:

- The Department, Program or Unit must select the student(s) or trainee(s) for participation;
- The funds must be provided to the Department, Program or Unit and not directly to the student or trainee,

- and be governed by a written agreement;
- The Department, Program, or Unit determines that the education conference or program has educational merit; and
- There is no implicit or explicit expectation that the participant must provide something in return for participation in the educational program.

3.10 Support for Research

All Persons who participate in the design, conduct, analysis, or reporting of Industry-funded research shall ensure a signed multi-partner agreement is in place which is satisfactory to the researcher, the head of the Department in which the researcher holds his/her primary appointment, the Industry partner, and the institution(s) where the research will be conducted. All research projects must be approved by the Research Ethics Board of the University of Manitoba and comply with policies of the Office of Research Services.

Research receiving such financial support must be carried out independently and objectively for the purposes of the advancement of scientific knowledge or clinical efficacy. Persons shall not enter into agreements that limit their right to publish or disclose results of the study or report adverse events which occur during the course of the study.

Because of the potential to influence judgment, remuneration for serving as a participant in research studies must not constitute enticement. Remuneration may cover reasonable time and expenses and must be approved by the relevant research ethics board. Finder's fees, whereby the sole activity performed by the faculty or staff is to submit the names of potential research subjects, are not acceptable.

Faculty members must ensure that all research contracts and grants funded by Industry are administered as stipulated in Section 3.1.

4.0 Disclosure of Relationships with Industry

Relationships between members of the Max Rady College of Medicine and Industry can be beneficial to the College itself, to the quality of health care provision, and to the impact that College members can make in teaching, research and innovation. However, actual, potential, or perceived conflicts of interest may arise as a consequence of such relationships. In order to encourage transparency and to ensure that such conflicts of interest are managed in the best interests of all, open disclosure of such relationships is an essential first step.

4.1 Disclosure to Department Head, Director or other Supervisor

Consistent with the *University of Manitoba Conflict of Interest Policy* and the *University of Manitoba Conflict of Interest Procedures*, and with any pertinent collective agreements, faculty and staff of the Max Rady College of Medicine will formally disclose financial and other relationships with Industry in a confidential manner to their Department Head, Director or Supervisor. This disclosure must occur at the time of their first appointment or hiring and thereafter as soon as they become aware of the existence of an emerging actual, potential or perceived Conflict of Interest.

As noted above, written agreements are required when Persons are engaged by Industry for consulting, speaking or research services, and the Department Head is required to approve all such agreements. This affords the Head the ongoing opportunity to be aware of such relationships and ensures the interests of the College and the member are safeguarded.

The confidential disclosure form (Appendix B) includes the following information:

- **INCOME:** All compensation received from Industry sources in the preceding two years
- **HOLDINGS:** Financial interests or ownership interests held by Persons, their Related Parties or by their partnerships, personal professional corporations or family trusts in businesses operating in areas related to the Person's practice, research, or other professional activity. Holdings in mutual funds are not reportable in this category.

The Department Head, Director or Supervisor acts as the Initial Reviewer for these disclosures. He or she will identify any potential risks to academic independence, integrity or reputation that may arise from the disclosures, and will work with the Person in a discrete manner to manage any real, potential or perceived conflicts of interest in any of their professional roles in the College.

Each Department Head, Director or Supervisor will report all declarations in a confidential manner to the Dean or designate who will act as the Secondary Reviewer. Details on the expected procedure to be followed regarding Conflict of Interest disclosure can be found in the *University of Manitoba Conflict of Interest Procedure*.

Disclosures by a Department Head, Director or Supervisor will be reviewed by the Dean as the Initial Reviewer. The Provost will act as the Secondary Reviewer. If the Conflict of Interest involves the Dean, the Provost will adjudicate.

4.2 Disclosure to Learners

The presence of relationships with Industry must be disclosed in a general manner to undergraduate, graduate, postgraduate and CPD learners by faculty or staff prior to any educational activity such as lectures, seminars or workshops. This includes all relationships over the previous two years, such as

- Any direct financial payments including honoraria
- Membership on advisory boards or speakers bureaus
- Industry-funded grants or clinical trials
- Patents on a drug, product or service
- All other investments or relationships that could be seen by a reasonable participant as having the potential to influence the content of the educational activity.

Information provided in this manner includes 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 learners.

Faculty or staff with supervisory responsibilities for students, trainees, or staff should ensure that any Conflict of Interest they might hold does not affect or appear to affect his or her supervisory role.

4.3 Disclosure in the Context of Procurement Decisions

Persons having a direct role in any purchasing or procurement decision by the College, government, regional health authorities, hospitals or other professional associations must, prior to participating in any such decision, disclose in writing to their Department Head, Director or Supervisor and to the Chair of the procurement committee any relationship with Industry that they or a Related Party have had over the previous two years, or other time period stipulated by the purchasing organization.

Such a disclosure would be with regards to companies that may derive an actual, potential, or perceived benefit from the decision. These relationships can include, but are not limited to, equity ownership, compensated positions on advisory boards, a paid consultancy, or other forms of compensated relationship.

4.4 Disclosure to Research Participants

Persons leading research involving human participants must inform them whether the researcher will or will not receive a fee for their participation. If the researcher will be receiving such a fee for this participation, the individuals leading the research must also disclose by whom the fee will be paid. In addition, Persons may not conduct research with human subjects if they or a Related Party have a financial or personal interest in an existing or potential product or a company that could be affected by the outcome of the research.

Exceptions may be permitted only if it is determined through reasonable and independent scrutiny that a Person's participation is essential for the conduct of the research and an effective mechanism for managing the conflict and protecting the integrity of the research, as well as the integrity, interests, and reputation of the Person and the University has been established.

5.0 Ghostwriting

All Persons addressed in this policy are prohibited from publishing or producing articles, presentations or other forms of media solely under their own name that are written in whole or in part by Industry representatives.

6.0 Education and Curricula regarding Interactions with Industry

All Persons within the College shall receive appropriate awareness training regarding this policy and related policies as part of their initial orientation and on a regular, at least annual basis thereafter. The College will develop appropriate education materials in each of its Educational Programs, and each Program will oversee such training and ensure its quality.

7.0 Reporting and Non-Compliance

Persons who become aware of suspected contraventions of this Policy must report such concerns to their Department Head, Director or Supervisor, who shall determine what actions, if any, shall be taken. Suspected contraventions by Department Heads, Directors or Supervisors must be reported to the Dean.

Breaches of this policy may result in any of the following actions (singly or in any combination) that are at the full discretion of the Department Head, Director or Supervisor:

- a) Counseling of the Person involved;
- b) Written reprimand, entered into the Person's employment, faculty or student record;
- c) Banning the Person from any further outside engagements for a period of time;
- d) Requiring that the Person return any monies received from the improper relationship with a third party in contravention of this policy;
- e) Requiring the Person to complete additional training on conflict of interest;
- f) Removing the Person from supervision of trainees or students;
- g) Termination for cause.

The action taken will depend upon the seriousness of the breach, whether the breach is a first or repeat occurrence and whether the Person knowingly breached the policy or attempted to conceal the breach. Any disciplinary action taken hereunder shall follow the established procedures of the University of Manitoba.

All disciplinary actions described in 7.0 d,e,f and g above must be reported in a timely fashion to the Dean.

Violations of this policy and related policies and procedures by Industry representatives will be managed by the Department Head through progressive warnings and restrictions on access. Such violations and warnings will also be reported to the Winnipeg Regional Health Authority and/or other affected regional health authority.

8.0 Review of Policy

This policy will be reviewed every three years.

9.0 Questions

Questions about this policy should be directed to the Dean, Max Rady College of Medicine.

Relevant University of Manitoba policies:

University of Manitoba Conflict of Interest Policy, June 16, 2009
Division of CPD CME/CPD Honoraria Policy
Division of CPD Commercial Support Policy
Gifts and Gratuities Offered to University Employees Policy Guidelines on Responsibilities of Research Ethics
Nepotism Policy
Research Agreement Policy
Responsibilities of Academic Staff with Regards to Students Policy
CPD Policy on Commercial Exhibits

Relevant Regional Health Authority policies:

Winnipeg Regional Health Authority (WRHA) Conflict of Interest Policy March 2011
Winnipeg Regional Health Authority (WRHA) Industry Relationships Policy September 2010

Related documents:

National Standard for Support of Accredited CPD Activities (CFPC, RCPSC, CMQ) 2016 [Read the Standard here.](#)

University of Toronto Faculty of Medicine “Relationships with Industry and the Educational Environment in Undergraduate and Postgraduate Medical Education.” 2013

Exemplary Policies: Managing Interactions between Physicians and Industry at Academic Medical Centers. October 2013. IMAP

Innovative Medicines Canada (Formerly Rx&D) Code of Ethical Practices (2012): <http://innovativemedicines.ca/ethics/code-of-ethics/>

Western University “Policy and Guidelines for interactions between Schulich School of Medicine and Dentistry and [...] Industry. October 2011

Association of American Medical Colleges. “Industry Funding of Medical Education: Report of an AAMC Task Force” (2008)

Canadian Medical Association. “Guidelines for Physicians in Interactions with Industry” (2007)

St. Boniface General Hospital. “Relationship with Pharmaceutical Manufacturing Industry Policy” (2006)

Department of Internal Medicine, University of Manitoba. “Policy Governing Relationships Between the Pharmaceutical Industry and Physicians” (2005)

College of Physicians and Surgeons of Manitoba. Guideline 106: Conflict of Interest: Relationship with the pharmaceutical industry 2002

Appendix A: Guidelines for compensation for services provided to Industry

1. Honoraria and expense reimbursement for CME/CPD activities supported by Industry

For speaking engagements that require overnight travel, the provided honoraria shall not exceed \$3 000 per day plus reimbursement of reasonable out-of-pocket expenses documented with receipts.

For speaking engagements that do not require overnight travel, the provided honoraria shall not exceed \$1 500 per day plus reimbursement of reasonable out-of-pocket expenses documented with receipts.

For the development of enduring materials, the provided honoraria shall not exceed \$1 500 per day plus reimbursement of reasonable out-of-pocket expenses documented with receipts.

For the review of enduring materials, the provided honoraria shall not exceed \$1 000 per day plus reimbursement of reasonable out-of-pocket expenses documented with receipts.

2. Compensation for acting as a consultant to Industry

Compensation for consulting work shall not exceed \$3 000 per day plus reimbursement of reasonable out-of-pocket expenses documented with receipts.

3. Compensation for work related to Industry-sponsored research

Compensation to an investigator for administrative activities required to initiate a research study (including budgeting, ethics submission, etc...) shall not exceed \$1 500 in total.

Compensation for attendance at an investigators' meeting shall not exceed \$1 500 per day. If the meeting is held face to face this should include reimbursement of reasonable out-of-pocket expenses documented with receipts.

Payments to an investigator for study-related procedures, examinations, follow-up visits required by protocol may not exceed the Manitoba Health tariff for these services and may not be double-billed.

Payments to an investigator for research-related services required for the conduct of a study not covered by Manitoba Health tariffs (administrative work, letters, reports, etc...) may not exceed \$750 per patient enrolled in the study.

Appendix B

Disclosure Form

This form is confidential when completed.

The information collected will be used by Department Chairs, Directors and Supervisors in the Max Rady College of Medicine to record and assess potential Conflicts of Interest of the individual making the disclosure. These reports will be shared confidentially with the Dean, Max Rady College of Medicine. De-identified data may be used for aggregated reports.

Name			
Reporting period	20_____	to	20_____
Department			
Clinical institution(s)			
Research institution(s)			

1. INCOME

Record all compensation received from industry sources in the reporting period

Source	Amount (\$)	Reason for Payment	Notes
		<input type="checkbox"/> Salary <input type="checkbox"/> Honorarium <input type="checkbox"/> Consultancy fee <input type="checkbox"/> Research support <input type="checkbox"/> Other (specify):	

		<input type="checkbox"/> Salary <input type="checkbox"/> Honorarium <input type="checkbox"/> Consultancy fee <input type="checkbox"/> Research support <input type="checkbox"/> Other (specify):	
		<input type="checkbox"/> Salary <input type="checkbox"/> Honorarium <input type="checkbox"/> Consultancy fee <input type="checkbox"/> Research support <input type="checkbox"/> Other (specify):	

OR

I have nothing to declare

2. HOLDINGS

Record all financial interests or ownership interests in Industry held by you, your Medical or Other Corporations or by your close relatives (Related Parties as defined in the Policy) in businesses operating in areas related to your practice, research, or other professional activity. Holdings in mutual funds are not reportable in this category.

Company	Self	Spouse or Immediate Family	Relationship to practice, research, or professional activity	Measures to manage potential conflict of interest
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		

OR

I have nothing to declare

_____ Signature

_____ Date