

## CPD POLICY 1.3.1

### CONFLICT OF INTEREST DISCLOSURE & MANAGEMENT FOR ACCREDITED/CERTIFIED CPD ACTIVITIES

**Approved by:** CPD Office

**Date of Original Approval:** July 30, 2019

**Date of Last Approval:** December 15, 2023

**Date of Next Scheduled Review:** December 2026

#### I. PURPOSE

Conflict of interest (COI) disclosure and management is an important component of the development and delivery of accredited/certified learning activities.

This policy has been developed in accordance with the [National Standard for Support of Accredited CPD Activities](#) (2017), to ensure independence, balance, and objectivity in all accredited/certified CPD activities developed, co-developed or accredited by the Continuing Professional Development (CPD) Unit within the Schulich School of Medicine & Dentistry.

This policy has also been developed in accordance with the [Policy and Guidelines for Interactions between Schulich School of Medicine and Dentistry and Pharmaceutical, Biotech, Medical Device, Medical/Dental Supply, and Research Equipment Supplies Industry \(2022\)](#).

#### II. STATEMENT

CPD requires individuals involved in the planning and/or delivery of an accredited/certified CPD activity to disclose all relationships with for-profit and not-for-profit organizations in the previous two years, and to manage conflict of interest appropriately, upholding transparency, objectivity and scientific validity.

##### i. Identifying Conflicts of Interest

Conflicts of interest are identified through a [COI Disclosure Form](#). Any person with control of the content of an accredited/certified CPD activity (i.e. members of the Scientific Planning Committee (SPC), SPC Chair, speakers, moderators, facilitators and/or authors) must complete the form, identifying all (or no) relationships with for-profit and not-for-profit organizations from the previous two years. The [COI Disclosure Form](#) requires a formal acknowledgement of the accuracy of the relationships identified.

Disclosures must specify relationships over the previous two years, including, but not limited to:

- any direct financial payments, including receipt of honoraria, consulting fees, etc.
- membership on advisory boards or speakers' bureaus.
- funded grants or clinical trials.

- patents on a drug, product or device;
- all other investments or relationships that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the educational activity.

The SPC is responsible for requesting and reviewing all COI Disclosure Forms before the accredited /certified learning activity to identify real or potential conflicts of interest and manage accordingly (Section iii Managing Conflicts of Interest).

## ii. Disclosing Conflicts of Interest

### *i. Before an accredited/certified CPD activity:*

The [COI Disclosure Form](#) must be completed as early as possible by the SPC Chair and all members of the SPC, speakers, moderators, facilitators and/or authors, upon confirmation of their participation in the accredited learning activity.

Completed COI Disclosure Forms for SPC members, speakers, moderators, facilitators and/or authors must be submitted to, and reviewed by, the SPC of the learning activity. It is the responsibility of the SPC to manage conflicts of interest (see Section iii). Only COI Disclosure Forms for SPC members are to be submitted to CPD's Accreditation Services during the accreditation review process.

Any individual who fails to disclose their relationships cannot participate as a member of the SPC, speaker, moderator, facilitator, or author of an accredited/certified learning activity.

Please note that the CPD Office can request all COI Disclosure Forms (including speakers, moderators, facilitators and/or authors) at any point during the review process, or as part of an activity audit. The CPD office may, at its discretion, request additional explanations or justifications regarding COI declarations and/or mitigation of bias strategies.

### *ii. At an accredited/certified CPD activity:*

Speakers must disclose all relationships with for-profit and not-for-profit organizations verbally and in writing on a slide(s) at the beginning of a presentation. The [Three-step disclosure slides](#) must be used for College of Family Physicians of Canada (CFPC) Mainpro+ certification.

All others involved in the development of accredited/certified learning activities must disclose their relationships, either in writing on a slide(s) at the beginning of an activity (this is required for CFPC Mainpro+ certification), or within the written activity materials.

## iii. Managing Conflicts of Interest

To manage potential or real conflicts of interest, the SPC must review all disclosure forms in advance of the accredited event, as well as the three-step disclosure slides (for CFPC Mainpro+ certification), to determine whether action is required. The SPC must have procedures in place to manage conflict of interest prior to, or during the accredited/certified event.

Steps to mitigate real or perceived conflicts of interest could include:

- ensuring that each conflict is fully disclosed to program participants.
- the speaker is asked to speak on a different subject.
- the speaker or scientific planning committee member alters their financial relationship.
- the scientific planning committee member relinquishes control of content of the program or

- presentation.
- independent expert content review is obtained.
- a speaker or scientific planning committee member may need to be replaced.

### III. DEFINITIONS

**Accredited/Certified Learning Activity:** Also referred to as an “Accredited CPD Activity”. An educational offering that is part of the CPD provider organization’s overall programming or one for which the CPD provider organization grants credit(s).<sup>i</sup>

**Conflict of interest (COI):** A set of conditions in which judgement or decisions concerning a primary interest (e.g. patient welfare, the validity of research, and/or quality of medical education) is unduly influenced by a secondary interest (personal or organizational benefit including financial gain, academic or career advancement, or other benefits to family, friends, or colleagues).<sup>ii</sup>

**Facilitator:** One 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.<sup>2</sup>

**Moderator:** One who presides over an assembly, meeting, or discussion.<sup>2</sup>

**Perceived conflict of interest:** The appearance of a conflict of interest as judged by outside observers regardless of whether an actual conflict of interest exists.<sup>2</sup>

**Real conflict of interest:** When two or more interests are indisputably in conflict.<sup>2</sup>

**Scientific Planning Committee (SPC):**

A group that includes representatives from all the identified target audience(s) that is responsible for: identifying educational needs, approving educational objectives; selecting educational methods, speakers, moderators, facilitators and/or authors; approving the content and delivery methods; and evaluating outcomes of the accredited CPD offering.<sup>1</sup>

**Speaker:** 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 an accredited learning activity.<sup>2</sup>

### IV. ADDITIONAL RESOURCES

[Conflict of Interest Disclosure Form](#)

[CFPC Quick Tips Identification and Management of Conflicts of Interest and Transparency to Learners](#)

[3-Step Disclosure Slide Template](#)

[Conflict of Interest Management Tool](#)

[CPD Activity Planning Guide, Pg 16 & 17](#)

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<sup>i</sup> [Canadian Accreditation Standards for Continuing Professional Development \(CPD\) Provider Organizations, 2023, Glossary of Terms, page 4.](#)

<sup>ii</sup> National Standard for Support of Accredited CPD Activities, 2017, V. 23.1, Glossary of Terms, page 8 - 10.