CPD POLICY:

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

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 (2018), 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.

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 accredited 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 event audit.

   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. 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 activity must disclose their relationships either in writing on a slide(s) at the beginning of a presentation, activity, or be included in the written activity materials.

iii. **Managing Conflicts of Interest**

   The SPC must review all disclosure forms in advance of the accredited/certified event, as well as the three-step disclosure slides (where applicable for CFPC Mainpro+ certification), to determine whether action is required to manage potential or real conflicts of interest. 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 event that meets the administrative, educational, and ethical standards of the Royal College of Physicians and Surgeons of Canada or College of Family Physicians of Canada. Accredited learning activities include group learning, self-learning and assessment, in a live or web-based format.¹

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).²

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.

Real conflict of interest: When two or more interests are indisputably in conflict.

Scientific Planning Committee (SPC): A group of target audience representatives responsible for the identification of the educational needs of the intended target audience; development of educational objectives; selection of educational methods; selection of scientific planning committee members, speakers, moderators, facilitators and/or authors; development and delivery of content; and evaluation of outcomes of an accredited CPD activity.²

IV. ADDITIONAL RESOURCES

Conflict of Interest Disclosure Form
Speaker Disclosure Slides Template
Speaker Letter Template

¹ Canadian Accreditation Standards for Continuing Professional Development (CPD) Provider Organizations, 2018, Glossary of Terms, page 20.