



Conflict of Interest Guidelines for the Canadian Optimal Medication Prescribing and Utilization Service

1.0 Purpose of the Guidelines

- 1.1 These Conflict of Interest Guidelines (COI Guidelines) are intended to ensure the highest ethical standards and maintenance of the integrity of the Canadian Optimal Medication Prescribing and Utilization Service (COMPUS) process. The principles of transparency and disclosure are essential to achieving these objectives. By disclosing relevant personal, occupational or financial connections; or interests with pharmaceutical companies and affected organizations, participants in COMPUS activities will ensure that conflicts of interest are identified and resolved, thereby preserving the objectivity and credibility of the COMPUS process.

2.0 Definitions

- 2.1 In these COI Guidelines, unless otherwise stated, the definitions set out in Appendix 1 attached hereto shall apply.
- 2.2 In these COI Guidelines the word “party” means a drug manufacturer whose drug(s) is the subject(s) of a COMPUS Topic or organizations, including direct competitors, whose interests are affected by a drug(s) or treatment(s) being reviewed.

3.0 Applicability

- 3.1 These COI Guidelines apply to all participants in the COMPUS process.

4.0 Scope of Conflict of Interest

- 4.1 A conflict of interest refers to situations in which personal, occupational or financial considerations may affect, or appear to affect, the objectivity or fairness of participants in the COMPUS process. A conflict of interest may be real, potential or perceived in nature.
- 4.2 A real conflict of interest arises where a participant in the COMPUS process has a private or personal interest, for example, a close family connection such as a spouse or child, or financial interest, with a party.
- 4.3 A potential conflict of interest may arise when a participant in the COMPUS process has a private or personal interest, such as an identified future commitment, with a party.
- 4.4 A perceived (or apparent) conflict of interest may exist when a reasonable well-informed person has a reasonable belief that a participant has a conflict of interest, even if there is no real conflict.

5.0 Disclosure

- 5.1 **All participants must disclose any conflict of interest, as defined above, in the form and manner prescribed by CADTH, at the earliest opportunity.** Before participants undertake any activities on behalf of CADTH or the COMPUS program, they are required to complete and submit a disclosure form.
- 5.2 All participants must complete the Conflict of Interest (COI) Disclosure Form annually. However, the obligation to disclose is ongoing and participants must continue to inform CADTH of any conflict of interest that arises, at the earliest opportunity.
- 5.3 A summary of the conflict of interest declaration for each CERC member will be publicly available on the CADTH website. Additionally, a summary of potential relevant conflicts will be summarized prior to each CERC meeting and circulated to all members.
- 5.4 A summary of conflict of interest for each participant who has contributed expertise or in an authorship role to a CADTH publication, shall be included in that publication.

5.5 Part I Disclosures

Without limiting the generality of the foregoing, participants are required to disclose all interests or activities that occurred during the past two years to the CADTH Vice-President, COMPUS.

Information shared may pertain to:

- i) receipt of funding for, or payment of, travel by a party
- ii) receipt of funding or honoraria from a party to be a speaker
- iii) receipt of funding or honoraria from a party for writing articles or editorials
- iv) receipt of funding or honoraria from a party for organizing conferences
- v) receipt of funding or honoraria from a party for giving educational lectures
- vi) receipt of any other financial support or honoraria from a party.

5.6 Part II Disclosures

Without limiting the generality of the foregoing, participants are required to disclose all interests or activities that occurred during the past five years to the CADTH Vice-President, COMPUS.

Information shared may pertain to:

- i) employment with a party
- ii) receipt of payment as an advisor or consultant for a party
- iii) receipt of payment from a party for academic appointments (including endowed chairs)
- iv) receipt of funding or honoraria from a party for personal education
- v) receipt of funding or honoraria from a party for research grants.

5.7 Part III Disclosures

In addition to disclosures made under Sections 5.5 and 5.6, participants are required to disclose any other activities or interests that affect or appear to affect the participant's objectivity or fairness.

- 5.8 Participants are required to disclose all of their stocks or stock options totalling more than \$10,000 (excluding mutual funds).
- 5.9 Participants are required to disclose all potential or pending future commitments with a party. The information to be disclosed relates to all interests and activities as described in Part I and Part II Disclosures outlined in sections 5.5 and 5.6.
- 5.10 All participants must sign and submit COI Disclosure Form(s), as prescribed by CADTH.
- 5.11 All participants, other than CADTH staff, are required to disclose to the Vice-President, COMPUS at the first opportunity, any contact with a party relating to a COMPUS Topic.
- 5.12 Before each CERC meeting, the Chair shall ask members if they have any conflicts of interest to disclose. Any CERC member with a conflict must disclose it and comply with the COI Guidelines and the Code of Conduct.
- 5.13 Participants shall not be involved in a COMPUS Topic in which they have a conflict of interest.
- 5.14 The CERC Chair, in consultation with the CADTH Vice-President, COMPUS has the authority to determine if the circumstances or interests of a participant amount to a conflict of interest in respect to a Topic(s) that is under review by the CERC.

6.0 Confidentiality

- 6.1 Participants are expected to respect the confidentiality of any confidential materials provided as part of the COMPUS process. No participant shall knowingly divulge any such information to any person other than another participant, unless the participant is legally required to do so. A participant shall not use information obtained as a result of his or her involvement in the COMPUS process for his or her personal benefit. Each participant shall avoid activities which might create appearances that he or she has benefited from confidential information received during the course of his or her activities with the COMPUS program.

7.0 Amendment to the COI Guidelines

After appropriate consultation, the COI Guidelines may be amended at any time by CADTH.

Conflict of Interest Disclosure Form

To: The CADTH Vice-President, COMPUS

I have read and understood the Conflict of Interest Guidelines (COI Guidelines) and I agree to be bound by the obligations contained therein. I understand that it is my responsibility to report to the CADTH Vice-President, COMPUS any real, potential or perceived conflict of interests as defined in the COI Guidelines, and to disclose the information requested in the COI Guidelines.

As a Member of CERC, I also understand that a summary of my conflict of interest declaration will be publicly available on the CADTH website and in all CADTH publications to which I have contributed in an advisory (i.e., have made recommendations) or authorship role. _____ (CERC Member to initial)

OR

I understand as a participant who has contributed expertise or in an authorship role to a CADTH publication that a summary of my conflict of interest declaration shall be included in that publication. _____ (Participant to initial)

I have reviewed my activities and interests as they relate to the matters itemized in the disclosure section of the COI Guidelines. Attached in Schedules 1, 2 and 3 is a list of those activities and interests.

I hereby certify that I have disclosed all relevant information with respect to any matter involving pharmaceutical companies or organizations that may place me in a real, potential or perceived conflict of interest situation. Except as otherwise disclosed in Schedules 1, 2 and 3 attached, I declare that I have no conflict of interest to report, as defined in the COI Guidelines.

I promise to inform CADTH of any change in circumstances that may create a conflict of interest, as soon as it is known to me.

I agree not to disclose or misuse, in any way, information I may receive in the course of my duties and activities with the COMPUS process.

Date

Print Name

Signature

Schedule 1

Conflict of Interest (COI) Disclosure Form

Part I – Disclosures

Part I

Disclosures are required under Section 5.5 of the COI Guidelines for those activities or interests during the past two years that involve any pharmaceutical company or organization, particularly as they relate to the following areas as required under Section 5.5 (add pages as necessary). Refer to Instructions for Completion attached.

Pharmaceutical Company or Organization	Drug or Topic involved/Year of Funding	Travel Funding or Payment	Funding or Honoraria for Educational Lectures	Funding or Honoraria for Organizing Conferences	Funding or Honoraria for Writing Articles or Editorials	Any Other Financial Support, Honoraria, or Gifts

Date

Print Name

Signature

Schedule 2

Conflict of Interest (COI) Disclosure Form

Part II and III - Disclosures

Part II and III

Disclosures are required under Section 5.6, and 5.8 of the COI Guidelines for those activities or interests during the past five years that involve any pharmaceutical company or organization (add pages as necessary). Refer to Instructions for Completion attached.

Pharmaceutical Company or Organization	Drug or Topic involved/Year of Funding	Employment or Payment as Advisor or Consultant	Research Funding or Grants	Payment for Academic Appointments (endowed chairs)	Personal Education Funding	Stocks or Stock Options of More Than \$10,000 (excluding mutual funds)

Date
Print Name
Signature

Schedule 3

Conflict of Interest (COI) Disclosure Form

General Disclosure

List those activities or interests involving pharmaceutical companies or organizations (not already listed in Schedules 1 or 2) that affect or appear to affect the participant's objectivity or fairness (e.g., employment of spouse or child; financial interest or investment in business enterprise or corporation; lobbying or promotional activities; or any other interest or activity that may create a reasonable apprehension of a conflict of interest, etc.).

Name of Pharmaceutical Company or Organization	Nature or Description of Activities or Interests

List those activities or interests involving pharmaceutical companies or organizations with whom a potential or pending future commitment (as outlined in Section 5.9). Details of the nature of the commitment are to be provided.

Name of Pharmaceutical Company or Organization	Nature, Timing and Value of the Future Commitment

DATE

PRINT NAME

SIGNATURE

Conflict of Interest (COI) Disclosure Form

Instructions for Completion

1. For each activity, in addition to the Pharmaceutical Company or Organization, list the drug/topic involved and the year of funding in the 2nd column.
2. Include all moneys received within the last 2 years as honoraria, gifts, trips, or personal education grants.
3. Include all payments received within the last 5 years as salary, research grants, academic appointments (endowed chairs) and educational, and consultation fees.
4. Include stock and stock options totalling more than \$10,000 (excluding mutual funds)

APPENDIX 1

COMPUS DEFINITIONS

In this document to which this Appendix is appended, the following definitions shall apply, unless otherwise provided:

CADTH: Canadian Agency for Drugs and Technologies in Health, a corporate body duly incorporated under the laws of Canada.

CERC: COMPUS Expert Review Committee.

Code of Conduct: the code of conduct for CADTH committees approved by CADTH.

COMPUS: Canadian Optimal Medication Prescribing and Utilization Service.

Conflict of Interest Guidelines (or COI Guidelines): the conflict of interest guidelines established by CADTH that guide the CADTH expert committee members, reviewers and other external experts.

Core Member: a Member of CERC, including a Public Member, appointed to serve for all Topics under consideration by CERC during such Member's term of office.

Member: a member of CERC, including a Core Member and a Specialist Expert.

Optimal Practice (OP): an evidence-based approach to prescribing or using drugs that is clinically effective and cost-effective and that contributes to optimal health outcomes (e.g. effective dosage regimens).

Participant: Core Members of CERC, Specialist Experts of CERC and any other experts retained to assist in the COMPUS program.

Public Member: a person selected to be a Core Member of CERC in the capacity of a member of the general public and not as a representative of any specific interest, group, or organization.

Recommendation: an action/recommendation/advice provided by CERC on the basis of its assessment of the supporting evidence.

Specialist Expert: a Member of CERC with expertise in a Topic area, appointed to provide expertise in recommending Optimal Practices related to the Topic area.

Topic: prescribing and utilization of drugs, management of conditions or other areas of interest identified by the COMPUS Advisory Committee as the subject for which Optimal Practices are to be identified, evaluated and promoted by COMPUS.