

CDA Corporate Administrative Policy Conflict of Interest Disclosure and Management for CPD Activities

Purpose

The Canadian Dermatology Association (CDA) is a national physician organization that provides continuing professional development (CPD) for dermatologists.

The CDA is committed to providing high quality CPD activities for which conflict of interest (COI) disclosure and management are important components.

To ensure the educational content of CDA CPD activities are, and are perceived to be, objective, balanced, and scientifically valid, the CDA has adopted the following policy that is intended to:

- Create a uniform COI disclosure and management process for all CPD activities
- Establish rules on the types of COIs to be disclosed to who and when; and
- Provide guidance on how COIs are to be managed.

Applicability

This policy applies to individuals involved in the development and/or delivery of educational content for a CPD activity including, but not exclusive to, scientific planning committee members, speakers, moderators, facilitators, and authors.

Policy Provisions

Principles:

1. This policy has been developed in accordance with the [National Standard for Support of Accredited CPD Activities](#).
2. The CDA recognizes that individuals involved in the development and/or delivery of a CPD activity can have a range of experiences and interests, arising from different contexts and activities done in a professional and personal capacity.
3. The CDA requires all pertinent relationships and interests in the 24-month time period up to the date of declaration, plus any new interests that will occur during the development of the CPD activity to be disclosed.
4. The CDA acknowledges that declaration of an interest does not indicate there is a conflict of interest.
5. Individuals who fail to disclose their relationships and interests cannot participate in the planning and/or delivery of the CPD activity.

6. The CDA reserves the right to remove individuals who fail to disclose a relationship or interest.
7. The CDA reserves the right to dismiss individuals who have, in the opinion of the CDA, a COI that cannot be managed.
8. Participation in a CPD activity cannot be confirmed until the disclosure review process is completed.

Disclosure Requirements:

9. COIs must be submitted using the CDA COI [Disclosure Form](#).
10. Disclosures must include all financial relationships (direct and indirect) with for-profit and not-for-profit organizations, as well as personal relationships or interests (financial and non-financial) that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the CPD activity.
11. Disclosures must list all relationships and interests in the 24-month time period leading up to the declaration submission, plus any new interests that will occur during the development of the CPD activity.
12. Completed disclosure forms must be sent to the CDA for processing. Disclosures will be shared with the CPD activity chair and with the CDA education committee and/or the assigned education committee member responsible for the CPD activity.
13. New pertinent relationships and interests arising during the CPD activity development period must be reported to the CPD activity chair and to the CDA education committee or the assigned education committee member.

Managing Conflicts of Interest:

14. The CPD activity chair and the CDA education committee and/or the assigned education committee member must review all disclosure forms to determine whether COI management actions are required.
15. Only individuals with no COIs or with manageable COIs can participate in the development and/or delivery of a CPD activity.
16. In instances where a significant COI exists, individuals may contribute expertise but must let others involved in the development of the CPD activity decide on the matter at issue. Significant COI is considered to be when the individual:
 - 16.1. makes products, provides services or activities related to the CPD activity;
 - 16.2. received financial or other compensation, including travel, that exceeded \$5,000 CAD in the preceding 12 months from a relationship or interest relevant to the CPD activity;
 - 16.3. owns equity or intellectual property rights and/or interests relevant to the CPD activity; or

- 16.4. holds a current leadership position with an organization that has a relationship or interest relevant to the CPD activity.
17. In instances where a significant COI exists for all individuals involved in the development of the CPD activity, the CDA education committee and/or the assigned education committee member will decide on the matter at issue.
18. CPD activities must be non-commercial and non-promotional. Products if mentioned must always be referred to by their generic names. Only when necessary, brand names may be added in parenthesis as secondary text after their generic names.
19. Should an unexpected commercial or promotional incident occur, the CPD activity chair (or moderator if different) must intervene immediately to stop the violation.

Disclosure Reporting:

20. Scientific planning committee members are responsible for the educational and ethical development of a CPD activity and must disclose all relationships and interests verbally and in writing at the beginning the CPD activity. This disclosure shall be a collective statement and be accompanied by a mitigation of bias statement for the CPD activity.
21. Individuals involved in the delivery of a CPD activity must disclose all relationships and interests verbally and in writing at the beginning of their presentation in the CPD activity.
22. Disclosures must be made to attendees of CPD activities whether you do or do not have a relationship or interest to disclose.

Accountability:

23. Failure to comply with the above provisions jeopardizes the credibility of all CDA CPD activities. CDA reserves the right to take appropriate actions including barring future involvement in CDA CPD activities and taking legal steps if financial and/or reputational losses are incurred.

Review

This policy shall be reviewed annually.

Approved by:

CDA Board of Directors
February 26, 2024