Canadian Cardiovascular Society Conflict of Interest Policy

The mission of the Canadian Cardiovascular Society (CCS) is to advance heart health for all. The CCS is a leader in setting standards for excellence in heart health and care, building the knowledge and expertise of the heart team, influencing policy, and advocating for the heart health of all Canadians.

The CCS is committed to transparent, unbiased, equitable, and evidence-based processes to preserve and protect the scientific integrity of its programs, projects, and activities. A rigorous process of disclosing, collecting, and managing conflicts of interest (COI) is required to help preserve and protect this integrity. COI may arise out of any relationship, real or perceived, which compromises an individual's objectivity including the financial and non-financial interests of members of CCS committees, working groups, faculty and panels, their families, or their friends.

The purpose of this policy is to guide COI reporting and support rigorous and consistent decisions about participation, risk mitigation, and recusals in CCS projects, programs, and activities where COIs are reported.

1. Definitions

Conflict of Interest (COI)	**A situation in which a member or organization is involved in multiple interests, financial, non-financial or otherwise, and serving one interest could potentially compromise the other.** A **COI** exists when a member's or organization's judgment or decisions concerning a primary interest (such as patient welfare and care, validity of research, award of research grants, quality of medical education, scientific document development) are unduly influenced or compromised by a secondary interest (such as personal or organizational benefit such as financial gain, academic or career advancement, or other financial, academic, or career benefits to family, friends, or colleagues). **A COI may be real or perceived**: – **A real COI is when two or more interests are indisputably in conflict.** – **A perceived COI is the appearance of a COI as judged by outside observers regardless of whether an actual COI exists.**
High-Level Conflict	**A COI where the potential for bias or undue influence is substantial and poses a significant risk to the integrity and objectivity of the decision-making process.** A high-level conflict can arise when a member has a relationship (financial, academic, career, or otherwise) with a high-risk entity that offers products or services or has influence directly impacting the

	member's judgment during their term of service. This may include receipt of consultancy fees from a manufacturer, honoraria, gifts, payments for lectures, continuing professional development (CPD), continuing medical education (CME), teaching, or course development related to the content of a CCS product or program.
Low-Level Conflict	**A COI where the potential for bias or undue influence is minimal and poses a relatively low risk to the integrity and objectivity of the decision-making process.** A low-level conflict, which is insufficient to require any limitations for a member's participation in a CCS program, include local site leadership of a pharmaceutical research study.
High-Risk Entity	**An entity, such as a pharmaceutical company or medical device manufacturer, with significant potential to influence decision-making due to financial interests or other incentives.** High-risk entities include for-profit or non-profit entities with products, services (e.g. pharmaceutical, biotechnology, medical device, insurance companies) that are included in, or would benefit from, CCS programs or products (such as scientific documents, statements).
Low-Risk Entity	**An entity that has minimal potential to influence decision-making due to limited financial interests or other incentives.** Low-risk entities include government or not-for-profit organizations not focused on a specific clinical area of interest related to the issue of involvement or work.
Financial Interest	**Any direct or indirect financial relationship, including but not limited to employment, ownership interests, stock holdings, consulting fees, honoraria, royalties, and research funding.**
Non-Financial Interest	**Any interest other than financial that could affect a member's objectivity, including personal relationships, academic competition, or intellectual beliefs.**
Disclosure	**The act of revealing any financial or non-financial interests that may be perceived as a COI, ensuring transparency and allowing for appropriate management of conflicts.**
Recusal	**The voluntary withdrawal or abstention from participating in decision-making processes, discussions, or activities where a COI exists, to maintain objectivity and integrity.**
Mitigation	**Strategies or actions taken to minimize, manage, or address COI, including but not limited to establishing independent review panels, implementing transparency measures, or imposing restrictions on participation.**

Independence	**The quality of being free from inappropriate influence, bias, or COIs, essential for maintaining the credibility and trustworthiness of CCS products or programs.**
Review Period	**A periodic evaluation process conducted to assess compliance with COI policies, identify potential COIs, and implement necessary measures to maintain integrity and transparency.**
Conflict Start Date	**The earlier of these situations: a) Start date of a contract with a high-risk and/or low-risk entity (written or otherwise), or b) Start of work, activity, contribution with a high-risk entity with which a conflict exists.**
Conflict End Date	**The latter of these situations: a) Last activity, work, contribution performed with a high-risk entity or d) End date of a contract (written or otherwise) with a high-risk entity.**
Retainer Agreement	**Generally, a retainer letter or agreement confirms the terms of engagement for professional services. It sets out the scope of services to be performed, billing matters, and authority to act.** Retainer activities, unless otherwise specified, do not have established end dates; therefore, there is no corresponding end date for the conflict.
Period of Conflict (POC)	**POC is the period 2 years prior to invited and approved participation in a CCS program, project, activity until the formal end of the activity.** The period of conflict is 2 years prior to the start of a CCS Guideline until it is formally published in the Canadian Journal of Cardiology.
Member	**An individual who participates in a CCS project, program or activity, committee, panel, faculty, or working group; the term member includes CCS members and associates, as well as non-members.**

2. Applicability

The COI policy applies to members of the CCS: Board of Directors; Council; Standing Committees; Guideline and Clinical Practice Update (CPU) Panels; CPD Program Scientific Planning Committee and faculty; and working groups, as well as Canadian Cardiology Congress (CCS) Scientific Planning Committee, faculty, moderators, speakers, and authors.

The Chair of each committee, panel or working group and the most senior CCS staff lead (or delegate) are accountable for collecting and reviewing COIs for their project, program, or activity.

3. COI Collection Periods

Members must disclose COIs before participating in a CCS project, program, or activity. Members must also update their disclosure should their COIs change during their participation.

a. Annual disclosure:

Annual disclosure of COIs is mandatory for active Board of Directors, Council, CCS committees, panels, workshops, and faculty members. Disclosures will be collected at the time of annual CCS membership renewal where applicable.

b. Ad-hoc disclosure:

Members must update their disclosures when their COI changes during participation in a CCS project, program, or activity. Ad-hoc disclosures can be prompted by the Chair of the committee, panel, or working group and/or CCS staff when necessary.

4. COI Disclosure Categories

Before participating in CCS projects, programs, or activities, members must provide a COI disclosure even if they have no direct or indirect COI to declare. The disclosure includes:

- Relationship(s) with high-risk and/or low-risk entities either profit and/or non-profit.
- Relationships that might result in any form of COI during the POC.

COI disclosure will be requested in the invitation for participation, annually thereafter, and when there is a change in any aspect of the disclosure during the POC. The COI disclosure categories are:

a) **<u>Financial interest</u>**

i. **Direct financial interest** is owned directly by an individual or entity, or which is under the control of an individual or entity, or which is beneficially owned through an investment vehicle or other intermediary.

Examples include direct payments for services from a high-risk entity (e.g., consultancy fees for a manufacturer, honoraria & gifts, payments for lectures, or other forms of CME/teaching/course development); patents on a drug, product, or device; funded grants or clinical trials sponsored by a commercial organization (for-profit and non-profit); travel/meeting/conference expense sponsorship; personal education funding; and direct stock investments/ownership/employment in a high-risk entity.

ii. **Indirect financial interest** is beneficially owned through an investment vehicle or other intermediary where the beneficiary does not control the intermediary and does not have the authority to supervise or participate in the investment decisions of the intermediary.

Examples include a collective investment vehicle, estate, trust or other intermediary over which the individual or entity has no control; mutual funds or blind trusts; payments to a family member from a high-risk entity; and stock investments/ ownership of a family member in a high-risk entity.

b) Non-financial interest (Intellectual/Academic/Personal)
Non-financial interest is any interest other than financial that could affect an individual's objectivity, including personal relationships, academic competition, or intellectual beliefs.

Examples include a leadership or remunerated role in research projects and/or leadership of clinical trials related to the topic of the activity (excluding site investigator or site principal investigator role in a multicenter trial); a leadership position in a professional organization and/or advocacy group with a high interest in the activity's topic (financial or otherwise); a profession where income is dependent upon specific recommendations that may be included in the specific CCS project, program, or activity; and membership on advisory boards or speakers' bureaus.

Direct and indirect financial interests are high-level conflicts. In some contexts, non-financial interests may also be high-level conflicts. These COIs require management and risk mitigation approaches that reflect the inherent threat of the COI to the independence and/or integrity of the CCS project, program, or activity. Factors such as the duration, nature of the relationship, and degree of relevance to the CCS project, program or activity will be taken into consideration when assessing, managing, and mitigating risk.

Due to the heterogeneity of potential types of COIs resulting from indirect financial interests, these COIs will be reviewed on a case-by-case basis. The magnitude of the interest will help inform the determination of the type of conflict, if any.

5. COI Collection, Determination, Reporting, and Information Retention

CCS staff members must ensure COI disclosures are collected from members to:
- Determine eligibility to join a project, program, or activity
- Determine recusal requirements within projects, programs and activities

Collection
COI must be documented for the duration of the project, program, activity or committee membership. Members must use a standardized disclosure form in MY.CCS.ca system to

report COIs. Upon completion, this data forms the individual's disclosure. If a member has no COIs to report, disclosure of 'no conflicts' is still required. Data collected in MY.CCS.ca system is governed by the CCS Privacy Policy.

Determination

CCS staff must generate a COI report for the Chair about the members of each project, program, or activity: (a) before confirming a member's participation in the project, program, or activity; (b) when a member's COI changes during the project, program, or activity; and (c) annually. The Chair must review the report and determine any recusal requirements and/or risk mitigation strategies.

Reporting

COI reports for panel members are uploaded to ccs.ca on the date of CCS Guideline or CPU publication in the Canadian Journal of Cardiology (CJC). Disclosure requirements for CJC are available at: https://www.sciencedirect.com/journal/canadian-journal-of-cardiology/publish/guide-for-authors. COIs are documented in each Guideline and CPU publication as follows: "The disclosure information of the authors and reviewers is available from the CCS on their guidelines library at www.ccs.ca."

COI disclosures for live CPD programs must be stated verbally and, where applicable, in written form at the beginning of presentations. For asynchronous online activities, COI disclosures must be published in the introductory material of the program.

COI disclosures for CCC must be published in the online program. During live delivery of CCC, speakers must also disclose their COIs verbally and, where applicable, in written form at the beginning of their presentations.

Failure to disclose COIs to the CCS in advance of publication or activity start date (even in the absence of relationships to disclose) will prevent individuals from participating in the CCS project, program, or activity.

Information Retention

The Royal College of Physicians and Surgeons of Canada (RCPSC) requires the CCS retain COI records related to accredited educational activities for 5 years from the date the activity. COI for other CCS projects, programs, and activities must be retained as appropriate.

Consulted Resources

- Canadian Medical Association Journal (CMAJ)

- Canadian Task Force on Preventive Health Care
- Guidelines International Network (GIN)
- National Standard for Support of Accredited CPD Activities
- The Public Health Agency of Canada (PHAC)
- PHAC/CIHR Best Brains Exchange
- Royal College of Physicians and Surgeons of Canada (RCPSC) CPD Activity Accreditation Standards for the Maintenance of Certification (MOC) Program
- Royal College of Physicians and Surgeons of Canada (RCPSC) conflict of interest declaration
- SPOR Evidence Alliance Conflict of Interest Disclosure Policy
- WHO Disclosure of Interest
- Qaseem, A., Wilt, T. J., & Clinical Guidelines Committee of the American College of Physicians*. (2019). Disclosure of interests and management of conflicts of interest in clinical guidelines and guidance statements: methods from the Clinical Guidelines Committee of the American College of Physicians. *Annals of internal medicine*, *171*(5), 354-361.
- Law Society of Saskatchewan: https://www.lawsociety.sk.ca/lessons/retainer-agreements/#:~:text=What%20is%20a%20Retainer%20Agreement,between%20you%20and%20your%20client. Accessed July 22, 2024
- AccountingTools. https://www.accountingtools.com. Accessed July 23, 2024