

CTTI CONFLICTS OF INTEREST POLICY

Conflicts of interest include circumstances that might cause an individual to be influenced or biased in the conduct of a project or in framing of the results.

Definition

For CTTI purposes, the term "Conflict of Interest" (COI) means any financial or other interest which conflicts with the service of the individual because it (1) could significantly impair the individual's objectivity or (2) could create an unfair competitive advantage for any person or organization. The term means something more than individual bias. There must be an interest, ordinarily financial, that could be directly affected by the project. The term COI applies only to current interests.

COI applies not only to the personal interests of the individual but also to the interests of others with whom the individual has substantial common financial interests -- particularly spouses, employers, clients, and business or research partners -- if these interests are relevant to the functions to be performed. Consideration must also be given to the interests of those for whom one is acting in a fiduciary or similar capacity (e.g., being an officer or director of a corporation, whether profit or nonprofit, or serving as a trustee).¹

Strategy

CTTI has a three-part strategy to address potential conflicts of interest: multi-stakeholder approach, disclosure, and transparency.

- **Multi-stakeholder Approach.** To address the complex challenges around clinical trials, CTTI believes it is critical to include all relevant stakeholders in identifying solutions to these challenges. As a matter of practice, CTTI's work engages groups of individuals representing relevant stakeholder perspectives. Because all stakeholders have an equal voice, and decisions are made collectively, no single individual, organization or sector controls or benefits more than others from CTTI activities.
- **Disclosure.** At the time the project team is established, it will complete a conflict of interest disclosure form indicating any potential conflicts of team members relative to the project. Completed forms will be submitted to the Director of Strategy and reviewed by the CTTI Directors to ensure any potential conflicts are appropriately acknowledged and managed.
- **Transparency.** All individuals involved in CTTI activities will be listed on the public website, including their contribution or role and their organizational affiliation.

¹ Adapted from the National Academies of Science, Engineering and Medicine. https://www8.nationalacademies.org/pa/information.aspx?key=Conflict_of_Interest. Downloaded on November 27, 2018.

Executive Committee (EC) Oversight

EC members will receive an annual update on the conflict reviews. In the unusual situation where an individual, organization or sector has a unique interest in, or the potential to receive a unique benefit from, a specific project, the EC will be asked to review the situation directly. In such cases, the EC has full discretion to take appropriate action to minimize the potential conflict.

Examples of potential conflicts which will be reviewed by the EC directly include the following:

- A company's proprietary product is used within the conduct of a project, which has the potential to influence team members or others to use the product in the future.
- An individual or organization provides in-kind contributions (e.g. programming for project survey) for a project beyond the typical types of contributions (e.g. team member).

In addition, an EC champion, project team leader, or staff director may request EC review of a potential conflict.

Policy approved by CTTI Executive Committee on November 30, 2018.