

Conflicts of Interest

Massachusetts General Hospital
December 18, 2014



MASSACHUSETTS
GENERAL HOSPITAL



MASSACHUSETTS GENERAL
PHYSICIANS ORGANIZATION

Background and Introduction

- *Special thanks to Partners Office for Interactions with Industry*
- Partners entities have a long history of promoting fruitful interactions with industry resulting in countless medical advances

But there are concerns about conflicts of interest

- Policies on conflict of interest ensure that relationships with industry are conducted with integrity & transparency

Background and Introduction

- Decisions and judgments relating to our charitable activities should be based on the best interests of our patient care, research and educational missions.
- External financial interests create the concern that our decisions may be biased, or be perceived as being biased, by those financial interests
 - Clinical Care- are patients' interests foremost?
 - Research- is the design, conduct, and reporting of research objective?
 - Education- is the audience receiving unbiased information?
- **Bias can be real, but even the perception of biased decision-making can damage the individual's and institution's reputation, erode public trust and undermine Partners hospitals' charitable activities – and create legal exposures.**



Contact Information for COI Questions

- *MGH Compliance*
 - *Rachel Ackman, Sr. Research Compliance Associate, 617-643-9721, rackman@mgh.harvard.edu*
 - *John Belknap, Chief Compliance Officer, 617-724-9725, jbelknap@partners.org*

- *Partners Office for Interactions with Industry*
 - *617-643-7752 or PHSOII@partners.org*

Partners and HMS Policies

- *What is an Outside Activity?*
 - Consulting, scientific advisory boards or Board of Director positions for:
 - Pharmaceutical companies
 - Medical device companies
 - Financial services companies
 - Any other vendor of Partners
 - ***Regarding Board of Director positions, contact OII***
 - Giving talks or a training presentation paid for by a commercial company
 - Expert witness work
 - Responding to phone or email surveys (***contact OII for these situations***)

Partners and HMS Policies

- *What Outside Activities are prohibited?*
 - Serving in an executive position of a for-profit company engaged in commercial or research activities of a biomedical nature (for full-time HMS faculty and Institutional Officials only)
 - Ghostwriting
 - Certain types of company-paid speaking or training engagements
 - “Speaker’s bureaus”, promotional activity
 - Having certain types of financial interests when you are engaged in research
 - HMS prohibits participating in clinical research on the technology of a company in which you/your family has any personal financial interests, receiving research support from a company in which you/your family owns equity, receiving research support from a company, or doing clinical research on a technology of a for-profit company, for which you serve on the Board of Directors.



Partners and HMS Policies

- *Are there limitations on Partners permitted Outside Activities?*
 - **Compensation** - Payment should not exceed Fair Market Value
 - **Time** – Medical staff who are full-time HMS faculty may spend up to 20% of working time on Outside Activities, not to exceed one day a week, unless limited by your supervisor. Non full-time HMS faculty must check with your supervisor about time permitted on Outside Activities.
 - **Institutional resources** – Cannot make substantial use of institutional resources (space, materials, staff).
 - **Use of name** – Company may not use Partners & hospitals' names.
 - **Intellectual Property** – Agmt must ensure company does not acquire hospital IP.
 - **General** – time and creative energy does not, in the supervisor's judgment, compromise or interfere with responsibilities at Partners
 - **Written Agmt** – required when activity is with an outside entity that is a pharma, medical device, or biotech company, vendor/potential vendor
 - Limited ability to participate in **purchasing decisions**
 - **No gifts!**



Disclosure Obligations

- *When do I have to disclose?*
 - **Annually**
 - This is a **Partners policy requirement** for all individuals involved in the design, conduct, and reporting of research
 - At the time of **grant submission**
 - This disclosure will draw on previous disclosures made by the individual
 - **Within 30 days of acquiring a new SFI**
 - This is a **PHS requirement**, which obligates individuals to update their disclosures on an on-going basis
 - Individuals subject to this requirement must track receipt of payments and file updates on their own initiative
 - Keep track of travel expenses and sponsored travel prior to reaching the \$5,000 disclosure threshold
 - *Note: Stock options in a start-up trigger the reporting requirement*

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