CTTI Conflict of Interest Policy

Status: In Effect | Effective Date: 30 Nov 2018 | Last Updated: 26 Apr 2023

Definition
For CTTI purposes, the term “Conflict of Interest” means any financial or other interest which, with respect to an issue being addressed by a CTTI project or activity, could (1) significantly impair objectivity and/or (2) 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 CTTI activity. The term Conflict of Interest applies only to current interests.

Conflict of Interest 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 or other 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).

Strategy
CTTI has a four-part strategy to address potential conflicts of interest:

- **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.

- **No-Business Zone Commitment:** CTTI fosters a forum for collaborative, multi-stakeholder dialogue. As such, individuals and organizations participating in CTTI activities—including, but not limited to, project team discussions, CTTI-hosted expert meetings, Steering Committee meetings, and CTTI webinars—commit to maintaining an environment free of promotional or business development activities.

- **Disclosure:** Individuals with a conflict of interest must (1) alert their primary CTTI contact to the conflict prior to beginning involvement with CTTI activities, or immediately upon a change in conflict-of-interest status, to ensure that potential conflicts are appropriately acknowledged and managed; and, (2) when discussing or providing input relevant to the conflicted issue, state that conflict for the awareness of other discussants.

- **Transparency:** All individuals directly involved in CTTI activities will be listed on the public website, including their contribution or role and their organizational affiliation. This includes, for example, all members of CTTI project teams, including their role as ‘team member’ or ‘team leader’; all speakers and attendees at CTTI-hosted expert meetings; and speakers, but generally not individual audience members, for public CTTI webinars.

Executive Committee Oversight
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 or activity, the CTTI Executive Committee will be asked to review the situation directly. In such cases, the Executive Committee has full discretion to take appropriate action to minimize the potential conflict. Examples of potential conflicts that will be reviewed include:

- A company’s proprietary product is used within the conduct of a CTTI 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 a project survey) for a project beyond the typical types of contributions (e.g., team member).

In addition, a project’s Executive Committee Champion, project team leader, or staff director may request Executive Committee review of a potential conflict.