

Conflict of Interest Policy Implementation for CancerLinQ

CancerLinQ is a quality measurement and reporting system through which oncologists can harness the depth and power of their patients' clinical records and other data to improve the care they deliver. The key objective of CancerLinQ is to monitor, coordinate, and improve the quality of care provided to cancer patients through the collection, aggregation, and analysis of data extracted from electronic health records (EHRs) of patients from participating practices (Providers). Provider and public confidence in the CancerLinQ system depends on its development in a manner designed to minimize and manage actual and perceived conflicts of interest.

The following procedures provide strategies for recognizing and managing potential conflicts of interest (COI) through the development of CancerLinQ, and in accordance with ASCO's Policy for Relationships With Companies¹ (ASCO's Policy).

I. General Policy

ASCO requires disclosure by individuals involved with the CancerLinQ LLC Board of Governors, Committees, Advisory Groups, and any Subcommittees or successor Committees thereof (CLQ Committees). The CLQ Committees are comprised of individuals who have experience and expertise in the field and who provide advice and recommendations regarding the design, development and implementation of CancerLinQ, and help to advance CancerLinQ in the community.

II. Disclosure

ASCO's Policy is to promote the development of CancerLinQ in a manner that maximizes transparency and public trust. Disclosure of relationships with commercial and other entities is the first step in ASCO's process of evaluating and managing relationships that could result in actual or perceived conflict.

a. General COI Disclosure

All prospective CLQ Committee members will disclose financial interests and other relationships with for-profit health care Companies² (each a Company) in accordance with ASCO's Policy via ASCO's online Disclosure Management System. These disclosures are general and may or may not identify relationships with Companies relevant to CancerLinQ. Disclosure categories include compensation received for employment, leadership positions, consulting activities, speaking

¹ American Society of Clinical Oncology, Policy for Relationships With Companies 2013 JCO2013.49.5002
<http://jco.ascopubs.org/content/31/16/2043.full>

² As a signatory Society to the Council of Medical Specialty Societies Code for Interactions with Companies, ASCO adopts the CMSS Code definition of "Company." A Company is a for-profit entity that develops, produces, markets, or distributes drugs, devices, services or therapies used to diagnose, treat, monitor, manage, and alleviate health conditions. Council of Medical Specialty Societies, Code for Interactions with Companies. www.cms.s.org/codeforinteractions.aspx

engagements, and expert testimony; as well as ownership interests, research funding (to the individual or the institution), and licensing fees and royalties associated with intellectual property interests received by CLQ Committee members themselves and their immediate family members.

An individual's COI disclosures must be current in ASCO's electronic system prior to appointment to a CLQ Committee. CLQ Committee members must keep their COI disclosures up to date by reviewing and confirming their disclosure annually, or whenever a relevant change is made. Disclosures will be available to the CLQ Committee members and staff during meetings, and to any decision making entity acting on CLQ Committee recommendations.

b. Additional Disclosure

In the context of CancerLinQ, relationships with certain entities outside of the health care arena could give rise to actual or perceived bias. Individuals may have a relevant indirect or non-financial interest or relationship with such an entity that is not covered by ASCO's general COI disclosure. Participants or nominees for CLQ Committees should disclose relationships with such entities, whether or not the entity does business primarily in the health care or cancer care sector. In situations where a participant must keep a relationship confidential, the interest should be disclosed to the CLQ Committee chair or appropriate staff member. CLQ Committee members are urged to err on the side of disclosure. Examples of entities for additional disclosure include, but are not limited to:

- Health Information Technology companies (EHR vendors, billing, communications)
- Companies with health care activities such as disease management, clinical pathways, clinical decision support, medical practice management
- General Information Technology companies
- Software companies
- Consulting companies
- Government or regulatory agencies
- Non-profit health or Information Technology advisory boards
- Academic institutions
- Patient advocacy organizations
- Other advocacy bodies

III. CancerLinQ Committees

CancerLinQ's goal is to assemble a diverse and well-qualified group of experts to provide advice and recommendations regarding the system's design, development and implementation.

Having a relationship with a Company does not necessarily mean an individual is biased or has a conflict of interest. However, CancerLinQ's Policy is that certain financial relationships give rise to conflicts of interest that are not capable of being effectively managed. In some instances, CancerLinQ may limit participation of individuals in CLQ Committees where relevant relationships with other entities could give rise to actual or perceived conflict and cannot otherwise be managed.

Employees or holders of significant ownership interest in any entity that is a vendor, supplier, paid consultant, or service provider to CancerLinQ or an affiliate (or individuals who serve in such a role) are not eligible to serve on CLQ Committees or subsidiaries, except that such individuals may serve on the CancerLinQ Board of Governors. Conflicts of interest of individuals serving on the CancerLinQ Board of Governors will be handled pursuant to the Conflict of Interest Policy for Officers and Governors of CancerLinQ LLC.

CancerLinQ staff may develop a COI management plan for CancerLinQ Committee members who have disclosed any other potentially conflicting relationship, which may include recusal from actionable decisions or recusal from discussions or topics.

IV. Exceptions

If required to achieve the goals of CancerLinQ, CancerLinQ may make occasional exceptions to this Policy Implementation, and procedures may be adapted on a case-by-case basis to the extent necessary.

V. Decisions

Questions about the application of this Policy Implementation will be decided by CancerLinQ LLC.

Application:

Applies to CancerLinQ LLC

History:

Adopted by CancerLinQ Board of Governors on February 24, 2015.