

Pain in the Rear View, LLC

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Duality of Interest (DOI) Disclosures

Guidance: This guidance is provided to assist members of Pain in the Rear View, LLC research efforts with disclosure of relationships (financial and other) with commercial entities to manage potential or perceived conflicts of interest relating to Pain in the Rear View, LLC research efforts.

Purpose: The purpose of this guidance is to manage potential bias or the appearance of bias related to commercial entities whose products or services may be used, tested and/or affected by or whose products or services might be affected by the results of Pain in the Rear View, LLC research efforts.

Obligations of Participants Regarding DOIs: It is the obligation of all Pain in the Rear View, LLC associates to comply with all Pain in the Rear View, LLC policies and any overseeing Institutional Review Board (IRB). Non Pain in the Rear View participants are expected to understand and comply with the policies of their individual Institutions and their Institutional Review Boards (IRB).

All Pain in the Rear View, LLC research project personnel should be in full compliance with all relevant DHHS, NIH, FDA and IRB DOI policies as well as all individual institutional DOI policies. Under the DHHS “final rule” (see Subpart F http://grants.nih.gov/grants/policy/coi/fcoi_final_rule.pdf) a duality for the purposes of Pain in the Rear View, LLC research efforts consists of any qualifying (see below) financial affiliation or equity holding in a private entity where that entity could reasonably be interpreted to be affected by the results of Pain in the Rear View, LLC research efforts. Any such duality that is reported to an individual’s Institution must also be reported to Pain in the Rear View, LLC.

A participant’s individual Institution then determines whether a declared duality requires management and the steps to be taken to mitigate the appearance of a duality. The

management plan should also be reported to Pain in the Rear View, LLC that in turn may take additional steps to manage the duality. Regardless of the individual's Institutional requirements, each participant must also disclose any DOI that satisfies the criteria for a significant financial interest as specified by Pain in the Rear View, LLC research efforts.

Who Should Complete a DOI Disclosure Form: All individuals who are participating in the conduct of Pain in the Rear View, LLC research efforts in any capacity (e.g., Principal Investigators, Co-Investigators, Study Coordinators, study staff, consultants, etc.) should complete a DOI Disclosure Form.

Study Duration to Which Guidance Applies: This guidance applies for the duration of any Pain in the Rear View, LLC research efforts, the preceding 12 months prior to completing the Disclosure Form, and until all major primary outcome publications are completed.

Examples of Interest that Should be Disclosed: All activities that would qualify as a duality according to the individual's Institution requirements should be reported to their Institution and also to Pain in the Rear View, LLC research efforts. In addition, regardless of the Institution's requirements, all relationships with commercial entities whose products/services are being used/tested or are in direct competition with those being used/tested should be disclosed to Pain in the Rear View, LLC.

- Ownership of stock, equity, or other financial interest in a company/entity which has products that might be used in or benefit from or be harmed by the results of any Pain in the Rear View, LLC research efforts.
- Employment, office or directorship in any company/entity involved or potentially involved with Pain in the Rear View, LLC research efforts.
- Personal compensation from any company/entity involved or potentially involved with Pain in the Rear View, LLC research efforts.
- Consulting/advisory arrangements with any company/entity involved or potentially involved with Pain in the Rear View, LLC research efforts, including service on: Data and Safety Monitoring Boards, External Evaluation Committees, Advisory Boards, Involvement with grants, contracts, research, training or other support (restricted or unrestricted) from any company/entity involved or potentially involved with a Pain in the Rear View, LLC research effort.

- Travel grants to attend educational symposia provided by any company/entity involved or potentially involved with Pain in the Rear View, LLC research efforts. This includes serving in one of the aforementioned consulting/advisory arrangements.
- Intellectual property rights (i.e. copyright, patent, trademark) related to the activities of Pain in the Rear View, LLC research efforts.
- Relationship with a company/entity that may affect academic advancement or status, such as sponsorship of an endowed chair or establishment of a fund for use by investigators of Pain in the Rear View, LLC research efforts

All of the above applies to companies/entities being studied as well as those in direct competition with the companies/entities being studied as defined above.

DOI Disclosure Procedures: DOI Disclosure Forms should be completed when first engaged in Pain in the Rear View, LLC research efforts and updated on no less than an annual basis. New conflicts should be reported as soon as they are identified by submitting a new DOI form.

Individuals meeting the qualifications for completion of a DOI Disclosure Form should specify their level of interest in combination with the levels of interest of their spouse and children as follows: a) No financial interest or equity, b) Financial interest in any publicly traded entity with a value > \$5,000 including the value of equity interest, c) Financial interest > \$5,000 in a commercial entity that is NOT publicly traded OR ANY equity interest in such an entity.

For example: If an individual and/or the individual's and/or dependent children own stock in a publicly traded company, and the individual and/or the spouse and/or dependent children have received payments from the company (e.g. as a consultant), and the total value of the income received and equity interest exceeds \$5000, then this would be declared as a duality of interest under (b).

If an individual owns equity in a company that is not publicly traded that is worth \$50, regardless of any other financial interest (e.g. income) then this would be declared under (c).

If an individual secures a \$6,000 speaking fee from Pharmaceutical Company Y, whether publicly traded or not, the speaking fee is greater than \$5,000 and therefore would be declared as (b or c).

DOI forms for all participants in Pain in the Rear View, LLC research efforts should be maintained by either the Pain in the Rear View, LLC research effort Coordinating Center (if Pain in the Rear View, LLC is the contractor) or with the research study's own Coordinating Center (if Pain in the Rear View, LLC is the sub-contractor in the study).

DOI Review Procedure: DOI forms will be reviewed by a committee as defined by the research effort's policies. DOIs that are relevant should be reported prior to each study meeting of particular Pain in the Rear View, LLC research group. Change in DOI status should be reported as soon as identified.

Options for Management of DOIs: In addition to the steps instituted by an individual's Institution to manage a reported duality, one or more approaches to the management of DOIs may be exercised at the discretion of each Pain in the Rear View, LLC research effort team. This will be decided on an individual basis according to the policies and procedures of a particular research effort.

- Public disclosure of relevant significant financial interests including disclosure to a research effort's steering committee. In some cases, disclosure alone may be sufficient and no further action is needed. Disclosure should be noted in meeting minutes and may be required in Pain in the Rear View, LLC research effort publications.
- Disqualification from participation in an activity that would potentially be affected by the DOI (e.g., authorship on a paper or voting on any issue related to a company/entity with which they have a relationship).
- Divestiture of significant financial interests to the extent that the financial relationship falls above the stated threshold for DOI.
- Severance of the relationships/activities that create actual or potential DOI.

What Constitutes DOI Violations: Violations involving DOI could lead to removal from a Pain in the Rear View, LLC research efforts' activities and include but are not limited to:

- Failure to disclose a pertinent DOI to Pain in the Rear View, LLC and/or to the individual's institution and/or its IRB (where required by the institution).
- Unwillingness to comply with duality management specified by the individual's institution or Pain in the Rear View, LLC research efforts.
- Failure to comply with Pain in the Rear View, LLC research efforts' DOI

In case of questions, please contact:

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Contact Person/Compliance Coordinator: Deborah J Murphy

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