

# ICER's Policies to Manage Potential Conflicts of Interest

ICER's value assessments are free from financial conflicts of interest from health care companies (see definition below). As an organization, we value transparency and hold ourselves, and our collaborators, to high standards for conducting our work.

As an advocate for transparency in the health care system, we lead by example, by voluntarily disclosing all financial interests that have been reported to us. We do so by different means:

- 1) ICER employees must adhere to ICER's full [Code of Business Conduct and Ethics](#)
- 2) Our independent appraisal committees are subject to limits on financial associations with health care companies and fill out an annual disclosure form, in addition to reporting conflicts of interest for each public meeting
- 3) ICER collaborators (health services researchers and health economists with whom ICER contracts to do our work) report any conflicts of interest ahead of each project, and
- 4) All public meeting participants who provide an oral comment, or participate in the policy roundtable, fill out a conflict of interest form.

ICER reviews this information on an on-going basis to ensure that any conflicts can be appropriately managed. It is important to acknowledge that declaring an interest does not necessarily mean that there is a conflict of interest.

We invite anyone who is declaring their interests based on this policy to disclose any interests they think may impact their judgement. The ICER Senior Leadership team will review any situations or circumstances that fall outside of the categories listed below on a case-by-case basis.

## Definitions:

Health care company: Any life sciences manufacturer and/or life sciences association (for example, pharmaceutical, biotechnology, or medical device companies), pharmacy benefit manager, or health plan, and/or health plan association, etc. Per our definition, this does not include hospitals and/or academic institutions.

Direct salary: salary payments received directly from a health care company (for example, manufacturer A pays individual X directly via check or direct deposit).

Salary support: in many academic institutions, employees (faculty or staff) may receive a percentage of their salary from a health care company's financial support on a specific research project or grant. We define this as salary support.

# Independent Appraisal Committees:

Category	Policy	Time Frame	Details
<b>Employment Restrictions</b>	<p>Voting members cannot be employed by health care companies.</p> <p>Committee members may not receive any income from a speaker's bureau representing a health care company.</p>	n/a	Exception: public payers can participate on ICER's committees as non-voting members.
<b>Disqualifying financial conflicts of interest (this means they cannot work with ICER)</b>	Committee members and their household may not have more than \$25,000 income from one health care company, or over \$50,000 total income from health care companies combined.	In the past 12 months.	<p>Income is defined as:</p> <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> </ul>
<b>Financial conflicts that require recusal from a specific project</b>	Committee members and their household may not have more than \$1,000 income from a health care company that manufactures the product under review, the comparator under review, or the direct competitor of the product under review, or any current therapy and/or therapy under development in the disease space.	In the past 12 months.	<p>Income is defined as:</p> <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received through their institution to support that individual's work or research).</li> </ul>

Category	Policy	Time Frame	Details
<b>Financial conflicts that require disclosure, but not recusal from a specific project</b>	Committee members must report any income from a health care company that manufactures the product under review, the comparator under review, or the direct competitor of the product under review, or any current therapy and/or therapy under development in the disease space.	In the past 12 months.	Income is defined as: <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received through their institution to support that individual's work or research).</li> </ul>
<b>Other disclosure obligations</b>	Committee members must disclose anything else that might be viewed as an important potential influence on their judgement.	n/a	This may include: <ul style="list-style-type: none"> <li>• Previously expressed public opinion (social media, editorial, journal article)</li> <li>• Personal experience with uncommon diseases</li> <li>• Use of any of the technologies under review</li> </ul>

## External Collaborators on ICER Assessments:

Category	Policy	Time Frame	Details
<b>Employment restrictions</b>	External collaborators cannot be employed by health care companies.	n/a	n/a
<b>Disqualifying financial conflicts of interest</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require recusal from a specific project</b>	External collaborators may not have more than \$5,000 income from work related to the product under review, the comparator under review, or the direct competitor of the product under review, funded by any of the manufacturers of those products.	In the past 12 months.	Income is defined as: <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received through their institution to support that individual's work or research).</li> </ul>
<b>Financial conflicts that require disclosure, but not recusal from a specific project</b>	External collaborators must disclose any income from work funded by the manufacturers of the product under review, the comparator under review, or the direct competitor of the product under review.	In the past 36 months.	Income is defined as: <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received</li> </ul>

Category	Policy	Time Frame	Details
			through their institution to support that individual's work or research).

## Expert Reviewers for ICER's Draft Evidence Reports:

Category	Policy	Time Frame	Details
<b>Employment Restrictions</b>	No restrictions.	n/a	n/a
<b>Disqualifying financial conflicts of interest</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require recusal from a specific project</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require disclosure, but not recusal from a specific project</b>	<p>They must report more than \$1,000 income from a health care company that manufactures the product under review, the comparator under review, or any current therapy and/or therapy under development in the disease space.</p> <p>If they are affiliated with an organization, they must report what percentage of the organization's annual funding is received from health care companies and list those companies.</p>	In the past 36 months.	<p>Income is defined as:</p> <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received through their institution to support that individual's work or research).</li> </ul>
<b>Other disclosure obligations</b>	They must report whether they collaborated with any third-party entity to compose feedback that is provided on an ICER report.	n/a	n/a

## Clinical and Patient Experts at ICER's Public Meetings:

Category	Policy	Time Frame	Details
<b>Employment Restrictions</b>	No restrictions.	n/a	n/a
<b>Disqualifying financial conflicts of interest</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require recusal from a specific project</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require disclosure, but not recusal from a specific project</b>	<p>They must report more than \$1,000 income from a health care company that manufactures the product under review, the comparator under review, or any current therapy and/or therapy under development in the disease space.</p> <p>If they are affiliated with an organization, they must report what percentage of the organization's annual funding is received from health care companies and list those companies.</p>	In the past 36 months.	<p>Income is defined as:</p> <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received through their institution to support that individual's work or research).</li> </ul>
<b>Other disclosure obligations</b>	They must report whether they collaborated with any third-party entity to prepare remarks as a public commenter or policy roundtable participant.	n/a	n/a

## Health Care Companies Participating in ICER's Public Meetings:

<b>Category</b>	<b>Policy</b>	<b>Time Frame</b>	<b>Details</b>
<b>Employment Restrictions</b>	n/a	n/a	n/a
<b>Disqualifying financial conflicts of interest</b>	n/a	n/a	n/a
<b>Financial conflicts that require recusal from a specific project</b>	n/a	n/a	n/a
<b>Financial conflicts that require disclosure, but not recusal from a specific project</b>	The representative must disclose which health care company they are employed by.	n/a	n/a

## All Other Participants at ICER's Public Meetings:

Category	Policy	Time Frame	Details
<b>Employment Restrictions</b>	No restrictions.	n/a	n/a
<b>Disqualifying financial conflicts of interest</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require recusal from a specific project</b>	No restrictions.	n/a	n/a
<b>Financial conflicts that require disclosure, but not recusal from a specific project</b>	<p>They must report more than \$1,000 income from a health care company that manufactures the product under review, the comparator under review, or any current therapy and/or therapy under development in the disease space.</p> <p>If they are affiliated with an organization, they must report what percentage of the organization's annual funding is received from health care companies and list those companies.</p>	In the past 36 months.	<p>Income is defined as:</p> <ul style="list-style-type: none"> <li>• Direct salary</li> <li>• Consulting fees</li> <li>• Stocks</li> <li>• Intellectual property rights</li> <li>• Royalties from intellectual property</li> <li>• Loan or debt interest forgiveness</li> <li>• Honoraria</li> <li>• Gifts</li> <li>• Expenses paid for travel, food, drink, or entertainment</li> <li>• Salary support via their academic institution</li> <li>• Research funding (directly paid to individual or received through their institution to support that individual's work or research).</li> </ul>
<b>Other disclosure obligations</b>	They must report whether they collaborated with any third-party entity to prepare remarks as a public commenter or policy roundtable participant.	n/a	n/a