

# USAID MEDICINES, TECHNOLOGIES, AND PHARMACEUTICAL SERVICES (MTAPS) PROGRAM

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Stakeholder meeting discussing aspects of pharmaceutical systems management. Photo credit: William Vasquez



## Managing Conflicts of Interest in Public Pharmaceutical Committees

Technical Highlight | August 2023 | Asia Bureau

USAID MTaPS and WHO developed a tool to standardize the approach to managing conflicts of interest in public pharmaceutical committees.

### Background

Good governance in pharmaceutical systems is a crucial step on the path toward meeting the health-related Sustainable Development Goals and achieving universal health coverage. Governance includes the effective prevention and management of conflicts of interest (COIs) that may compromise the integrity of decision making in the public pharmaceutical sector. A conflict of interest is a situation and a risk that arises when a

person has an interest (such as a financial one) that could potentially interfere with their entrusted obligation, duty, or responsibility to serve a party or perform a role.<sup>1</sup> A COI creates an incentive and increases the risk that an individual's judgment or actions may be compromised, that bad decisions are made, or that corruption can secure a foothold in an organization.

<sup>1</sup> WHO (2022). Managing conflicts of interest: A how-to guide for public pharmaceutical-sector committees in low- and middle-income countries. Geneva: World Health Organization; 2022. License: CC BY-NC-SA 3.0 IGO. <https://apps.who.int/iris/bitstream/handle/10665/363124/9789240057982-eng.pdf>

Adverse outcomes can occur throughout the pharmaceutical system as a result of COIs, including poor quality of care and harm to individuals, wastage of valuable health system resources, and a lack of trust in government institutions. COI in the public pharmaceutical sector is common in high- and low-income countries and is often not well understood. Bringing transparency to decision making in pharmaceutical systems, including improved approaches to COI, is consistent with the US Agency for International Development's (USAID) desire to institutionalize efforts. The USAID Medicines, Technologies, and Pharmaceutical Services (MTaPS) Program has a rich legacy of effective work in pharmaceutical governance. MTAps is well aligned with the World Health Organization (WHO) Department of Health Products Policy and Standards in developing guidelines and manuals for informing decision making, including policies that take COIs into consideration.

## Problem Statement

There is limited information on how COIs are managed in public pharmaceutical decision making, particularly in low- and middle-income countries (LMICs). In 2021, WHO conducted a study on COI management policies and practices in the public pharmaceutical sector in 10 countries in the WHO South-East Asia Region. The common gaps identified included the lack of organized practices for preventing and managing COIs.<sup>2</sup> Organizing efforts to reduce COIs in LMICs can lead to increased timely access to safe, effective, quality-assured medicines and lower out-of-pocket expenditures. As a result, in 2021, MTAps, in collaboration with WHO, set out to develop a manual in response to the need to

understand COIs in public pharmaceutical decision making and the need for guidance on preventing and managing COIs in LMICs.

## Technical Approach

MTaPS, in collaboration with WHO Division of Medicines and Health Products, developed a manual to provide practical guidance on how to prevent and manage COIs in public pharmaceutical systems in LMICs.

MTaPS adopted the following steps in developing and disseminating the manual:

- Developed draft content through literature review and subject matter expert interviews
- Solicited input on draft content from key stakeholders and incorporated feedback in consultation with WHO
- Disseminated the manual via the [Joint Learning Network](#) for Universal Health Coverage; webinars hosted by WHO (reaching 36 participants, with 17 from 4 countries in Asia); and MTAps regional dissemination activities<sup>3,4</sup>

The collaborative work between MTAps and WHO led to a publication entitled “Managing conflicts of interest: A how-to guide for public pharmaceutical-sector committees in low- and middle-income countries.” The manual outlines two strategies for preventing and managing COIs in public pharmaceutical decision making committees:<sup>5</sup>

- Policy and implementation mechanisms
- Prevention and management processes and procedures

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<sup>2</sup> WHO (2022). Conflict of interest management policies and practices in the public pharmaceutical sector in the WHO South-East Asia Region. <https://www.who.int/southeastasia/internal-publications-detail/conflict-of-interest-management-policies-and-practices-in-the-public-pharmaceutical-sector-in-the-who-south-east-asia-region>

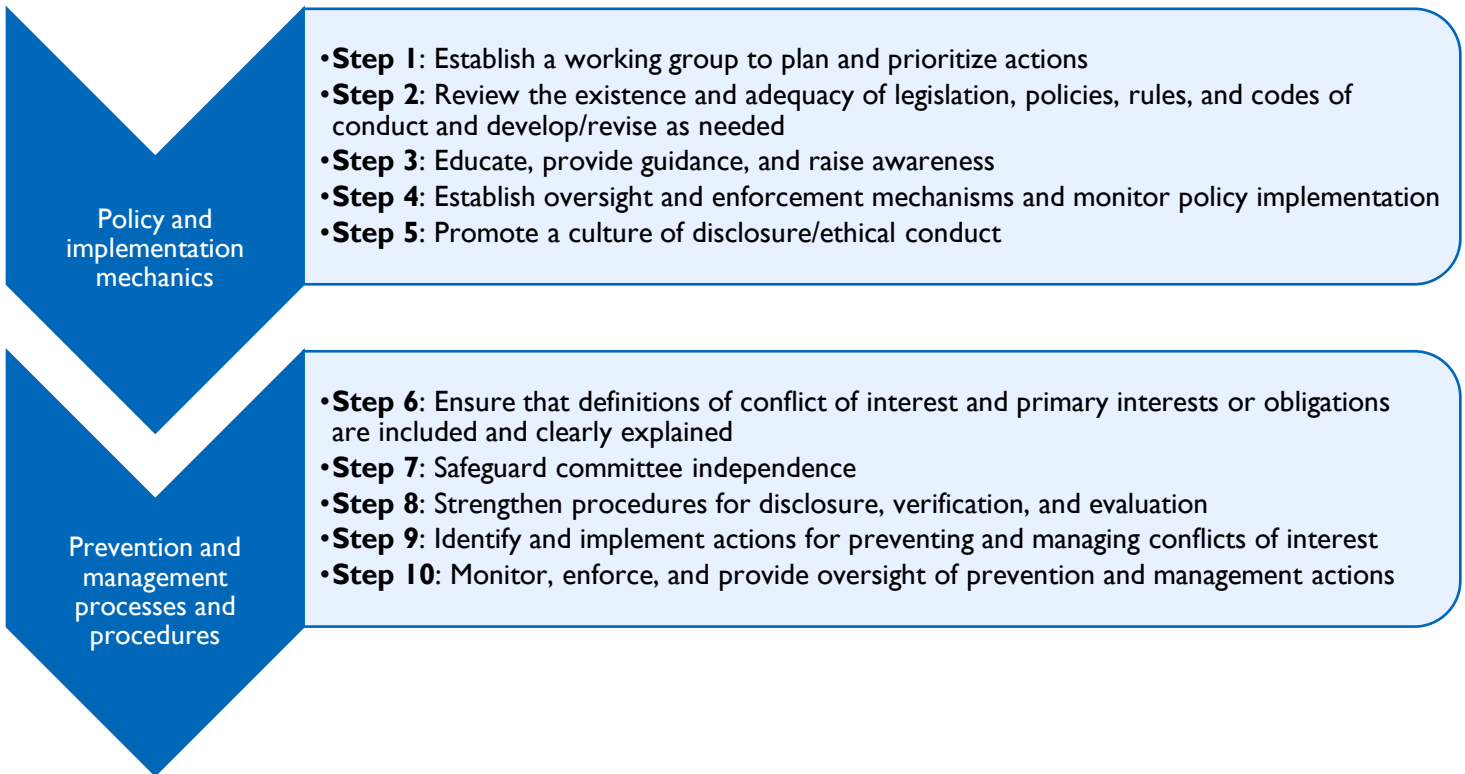
<sup>3</sup> Managing Conflicts of Interest in National Pharmaceutical Systems. <https://www.jointlearningnetwork.org/what-we-do/managing-conflicts-of-interest-in-national-pharmaceutical-systems/>

<sup>4</sup> For more information: <https://www.mtapsprogram.org/our-resources/approaches-and-tools-for-strengthening-pharmaceutical-systems/>

<sup>5</sup> WHO (2022). Managing conflicts of interest: A how-to guide for public pharmaceutical-sector committees in low- and middle-income countries. Geneva: World Health Organization; 2022. License: CC BY-NC-SA 3.0 IGO. <https://apps.who.int/iris/bitstream/handle/10665/363124/9789240057982-eng.pdf>

The manual also sets out 10 steps for executing these strategies, as depicted in figure 1.

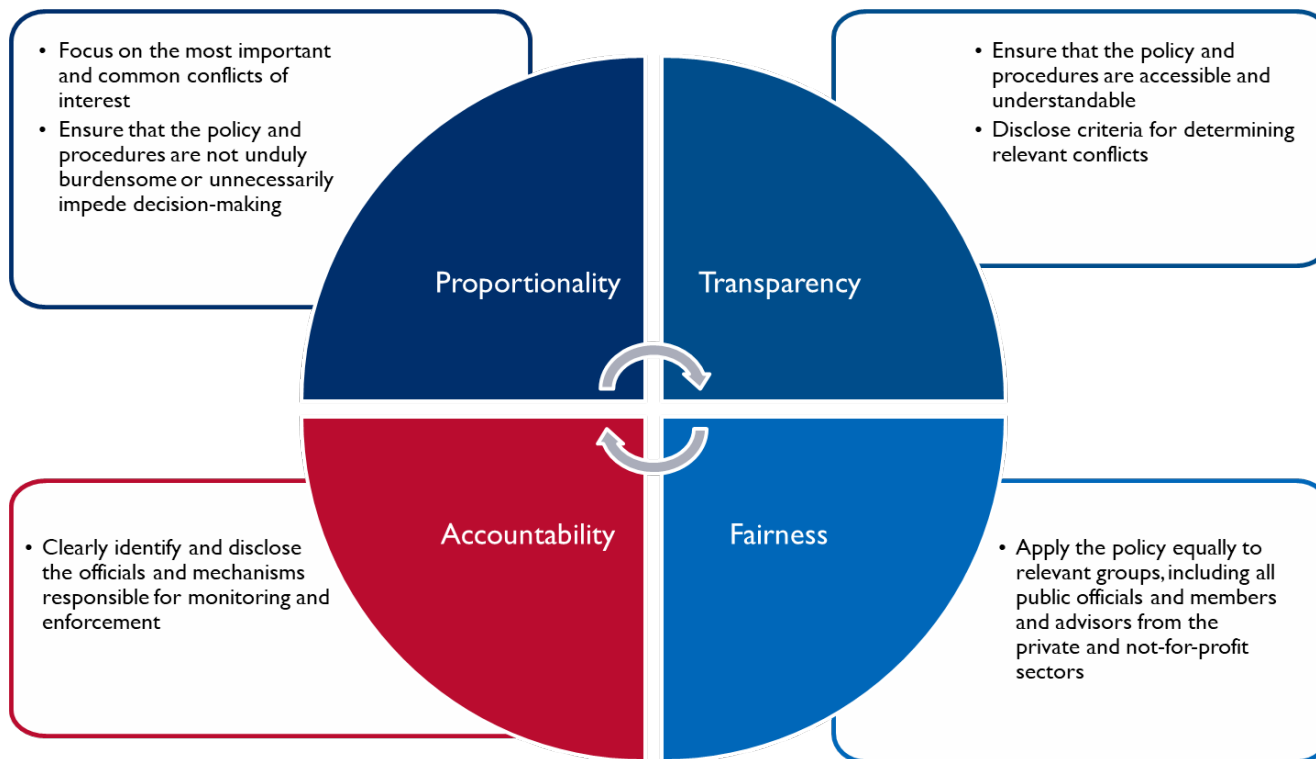
The steps identify how to get started, including forming an initial COI working group and identifying committee members, evaluating the current landscape in a country, and reviewing or developing policies and processes to guard against COI. The steps elaborate approaches for training, monitoring, and enforcement mechanisms, as well as activities to raise awareness and encourage compliance with policies. Finally, the steps outline processes and procedures at the committee level (e.g., procurement and medicine selection committees) to identify and prevent COIs and to implement responses when situations arise.



**Figure 1. Ten steps for improving the prevention and management of COI**

From WHO (2022). Managing conflicts of interest: A how-to guide for public pharmaceutical-sector committees in low- and middle-income countries. <https://apps.who.int/iris/bitstream/handle/10665/363124/9789240057982-eng.pdf>

The manual further discusses the principles of proportionality, transparency, accountability, and fairness that are to be used to guide the development, implementation, and evaluation of COI policies and practices for public pharmaceutical committees (figure 2).



**Figure 2. General principles to guide the development, implementation, and evaluation of COI policies for public pharmaceutical committees**

From WHO (2022). Managing conflicts of interest: A how-to guide for public pharmaceutical-sector committees in low- and middle-income countries. <https://apps.who.int/iris/bitstream/handle/10665/363124/9789240057982-eng.pdf>

The 10 steps outlined in the “Managing conflicts of interest” guide do not need to be followed sequentially and are meant to be implemented in tandem with the four guiding principles for development, implementation, and evaluation of COI policies and practices for public pharmaceutical committees: proportionality, transparency, fairness, and accountability.<sup>6</sup>

## Lessons Learned

MTaPS observed the following lessons from the process of developing the WHO-approved COI guidelines to provide guidance to implementing partners undertaking similar activities:

- To improve efficiency and timeliness of multiple quality reviewers of the manual, stakeholders could have been encouraged to use virtual tools (e.g., cloud-based platforms), which can facilitate timely and in-depth engagement and feedback during content development. This approach would have improved the efficiency of the review process, reducing time to develop a final product.
- Integrating key messages and good governance concepts into interactive knowledge exchanges, such as through platforms like the Joint Learning Network, is an exemplary way to increase engagement with and uptake of the concepts presented in high-level manuals.

<sup>6</sup> WHO (2022). Managing conflicts of interest: A how-to guide for public pharmaceutical-sector committees in low- and middle-income countries. Geneva: World Health Organization; 2022. License: CC BY-NC-SA 3.0 IGO. <https://apps.who.int/iris/bitstream/handle/10665/363124/9789240057982-eng.pdf>

## Conclusions

This manual is a step forward in supporting countries to strengthen policy, prevention, and management of COIs in public pharmaceutical committees. The approach is practical and can be adapted to suit specific contexts. The manual will be updated periodically as more evidence is gathered.

The manual is housed on the WHO website (accessible [here](#)) for anyone to use for improving how COI issues are addressed in workplaces where pharmaceutical product decisions are made. The MTaPS program will continue to disseminate the manual and encourage its use during skills-building workshops, both internally (MTaPS-driven) and externally through global platforms, as it did during the People that Deliver Global Indaba, a forum on human resources for health supply chain management in 2022, the materials for which can be accessed [here](#).<sup>7</sup>

In collaboration with WHO, MTaPS is developing an eLearning course to support use of the manual with decision makers and other stakeholders in the public pharmaceutical sector. Topics include identifying and managing COI and implementing policies to prevent and manage COI. The course will be housed on WHO's open learning platform, OpenWHO ([www.openwho.org](http://www.openwho.org)).

Future areas of work for implementing partners working across LMICs for improved public pharmaceutical policy and decision making include:

- Establishing an international database of COI policies and tools and setting up mechanisms for cross-country collaboration
- Sharing lessons learned on approaches for adapting and applying generic COI-related guidance and tools to specific country and committee contexts
- Building on MTaPS' experience in addressing COI in the public pharmaceutical sector, key areas for further action by all stakeholders include:
  - Provide a safer environment for whistle blowers who want to report important COI risks and effectively implement legislation that protects them
  - Identify metrics and approaches for evaluating the results of COI policies and strategies
  - Disseminate the COI manual and the OpenWHO eLearning course to pharmaceutical systems stakeholders through global networks, as part of efforts to encourage application of COI supportive approaches into regular work practices

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<sup>7</sup> People that Deliver Global Indaba 2022. <https://www.mtapsprogram.org/news-blog/people-that-deliver-global-indaba-2022/>

## Additional Reading

OECD. Managing conflict of interest in the public service: OECD Guidelines and Country Experiences [Internet]. Paris, France: OECD; 2003. Available from: [https://read.oecd-ilibrary.org/governance/managing-conflict-of-interest-in-the-public-service\\_9789264104938-en#page1](https://read.oecd-ilibrary.org/governance/managing-conflict-of-interest-in-the-public-service_9789264104938-en#page1)

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## Acknowledgements

Thank you to the staff from MTaPS Asia Bureau for their support in the development of this technical brief.

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## About USAID MTaPS:

The USAID Medicines, Technologies, and Pharmaceutical Services (MTaPS) Program (2018–2024) enables low- and middle-income countries to strengthen their pharmaceutical systems, which is pivotal to better health outcomes and higher-performing health systems. The program is implemented by a consortium of global and local partners, led by Management Sciences for Health (MSH), a global health nonprofit.

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