



Policy on Collection of Financial Relationships and Resolution of Conflicts of Interest

Yellow-highlighted phrases require client modifications and once made removal of the highlighting.

Purpose

In accordance with the ACCME’s *Standards for Commercial Support of Continuing Medical Education*, the Policy on Collection of Financial Relationships and Resolution of Conflicts of Interest (COI) exists to provide guidance for staff, instructors, planners, reviewers and managers of CME activities sponsored by <CLIENT NAME> <CLIENT ACRONYM> (and applicable educational partners). This policy addresses the underlying philosophy of disclosure to learners, mechanisms to collect disclosure information and the parties from whom financial disclosure shall be collected, the mechanisms to resolve COI, and requirements to make disclosure to learners prior to the start of an activity.

Guiding Principles Relating to COI and its Disclosure

<CLIENT ACRONYM> is guided by what is in the best interest of the public, always deferring to independence from commercial interests, and keeping CME separate from product promotion. The following are guiding principles for the collection, management and resolution of COI.

Policy

Identifying Conflict of Interest

A Financial Disclosure Form shall be provided to individuals involved with a CME activity that *have the following roles*:

- Instructor/Faculty
- Reviewer/Planner/Course Director/Editor or Writer
- Staff, who manage the content/development of the CME activity (not logistics)

Recipients of financial disclosure forms must complete and return the document within three weeks of receiving it as a condition for participation in the role of planner/reviewer/course director/faculty/author/editor or writer/staff manager and/or contracted medical writer for the CME activity. Reporting guidance is as follows:

- Any personal financial relationship during the previous 12-month period represents a potential conflict of interest, and therefore must be reported. This also includes spouses and life partners.
- A COI is present when both (a) the relationship is financial and occurred within the past 12 months and (b) the individual has the opportunity to affect the content of CME.

Processing COI Forms

- Staff project managers have primary responsibility for initial processing of conflict of interest forms and documenting reported information that requires resolution.
- The <STAFF TITLE> will be consulted with cases in which the resolution is unclear or where disqualification is an option.
- The <CHIEF MEDICAL OFFICER><CHAIR OF THE <CME COMMITTEE><CHAIR OF THE CME ADVISORY BOARD><CHAIR OF THE MEDICAL ADVISORY BOARD> is an additional resource for resolution of COI when the <STAFF TITLE> is not available or in cases when he/she recuses him/herself.
- Options for resolution of COI include:
 - Substitution of a person with no COI or minimal levels of COI
 - Review of CME content by a qualified reviewer that is not the person that developed the content
 - Referencing the best available evidence in all CME activities in which potential conflicts exist
 - Requesting the instructor or planner to sever financial relationships with the commercial interest
 - Assigning the person with COI to a role in which therapeutic options will not be recommended
 - Excluding that part of the instruction or disqualification of the presenter

Documenting Resolution of COI

For Faculty . . .

- Completed Financial Disclosure Forms will be maintained in the activity file
- The resolution of COI by staff and/or the <NAME OF CME COMMITTEE><CHIEF MEDICAL OFFICER> will be documented on the Resolution of COI Form.

For Planners . . .

- Staff and/or the <CME COMMITTEE><ADVISORY BOARD> will take cognizance of planners from whom disclosure forms indicate a COI
- Mechanisms to resolve COI for planners are as follows:
 - Replace planners with significant COI with other experts that are not conflicted, if possible
 - When replacing planners is not feasible, staff and/or the <CME COMMITTEE><ADVISORY BOARD> must provide stringent oversight of the planning process to ensure objectivity, fair balance and absence of commercial bias
 - Faculty/Planner Agreements—on which the Planner attests that he or she will plan the activity objectively, with fair balance and without commercial bias—must be provided, signed by the planner, and received by <CLIENT NAME> prior to the commencement of planning; should new planners be added after the planning process begins, those persons shall not commence their work until their financial relationships disclosure has been received and there is resolution of any relevant COI
 - When significant COI is present, final presentation content must be reviewed prior to the execution of the activity and documentation provided that demonstrates objectivity, fair balance and absence of commercial bias

For Reviewers . . .

- Reviewers should not have any relevant COI
- If COI is present, another reviewer should be selected with no COI
- In those rare instances where every potential reviewer has one or more conflicts and there is no qualified reviewer without COI, then two reviewers should be utilized as a check-and-balance

Implementation

- **For Instructors**

- Financial Disclosure Forms will be attached to the Faculty Letter with clear instructions on due date for their return
- Failure to return financial disclosure information will result in disqualification
- Instructors that have current promotional relationships with a CI on the same topic as the CME activity may have an irreconcilable COI; should their level of expertise require their continued involvement in planning, they will be recused from specifying treatment options in course content

- **For Planners and Managers**

- As soon as external physician planners and reviewers for the activity are identified, a Financial Disclosure Form must be provided to them in writing with instructions to complete and immediately return
- Staff that affect the content of CME, or contracted medical writers, will complete a disclosure form annually and that information shall be transparent to the learners
- <NAME OF CME COMMITTEE> members will complete a disclosure form annually

Transparency to Learners

Learners will be provided with information on identified COI from any of the above categories of persons that affect the content of CME, and that information will be positioned in course materials such that it is read by learners prior to the execution of the CME activity.

This policy was approved by <add> on <date>.