

**Policy for Disclosure and Resolution of Conflict of Interest  
in CME Activities  
Southern Illinois University School of Medicine**

As an ACCME-accredited sponsor of CME, SIU School of Medicine must ensure balance, independence, objectivity, and scientific rigor in all its educational activities. The content or format of CME activities and related materials must be crafted to promote improvements in quality of healthcare and not to promote proprietary business or commercial interest.

All faculty participating are expected to disclose to the audience any real or apparent conflicts of interest with any commercial or proprietary entity that produces healthcare-related products and/or services relevant to the content that is being planned, developed, or presented for a CME activity so that any conflict may be resolved. This includes any financial relationships\* within the last 12 months, as well as known financial relationships of spouse, domestic partner, or immediate family member.

\*Types of relationships may include: full-time or part-time employee, independent contractor, consultant, research or other grant recipient, paid speaker or teacher, membership on advisory committees or review panels, ownership interest (product/royalty/licensing fees, owning stocks, shares, etc.) or any other financial relationship.

**Timeframes**

- For course directors and planning committee members, disclosure and resolution should occur before topics and speakers are selected.
- For speakers and authors, disclosure and resolution must occur before presentations are made or manuscripts finalized. Note: In instances where conflicts that could substantively alter the program content or speakers are likely, disclosure and resolution for speakers should occur before topics and speakers are finalized.

Responsibilities:

- The Office of CME: The OCME is responsible for obtaining and reviewing disclosures from course directors, planning committee members, and speakers. The OCME will inform the course director if there are conflicts to be resolved. If the course director discloses a potential conflict, the OCME will refer the matter to the Chair of the CME Committee. The OCME will prepare disclosure summaries for the course syllabus and ensure that the course file has documentation of disclosure to the Office of CME, of conflict resolution, and of disclosure to participants.
- Course director. Course directors are responsible for resolving speakers' conflicts of interest. The course director will be consulted when others who control content have failed to provide disclosure information after repeated attempts by the Office of CME. Individuals who do not disclose will be disqualified.

## Procedures for “Regular” CME Courses

1. Initial planning meeting. The OCME will explain ACCME requirements and the course director’s role in disclosure and resolution.
2. Course director(s) and planning committee members disclosure and resolution.
  - a. Disclosure. The OCME will provide disclosure forms for the initial planning meeting with course directors. The forms should be completed at the meeting. If the form is not completed at the meeting, the OCME will send disclosure forms for immediate completion. The OCME will confirm receipt of forms and inform planners if a course director or planners either: (1) repeatedly fail to return a completed form or (2) return a form with a current conflict of interest.
  - b. Failure to provide disclosure. The Director of CME will address the specific circumstances of the situation, assuring that a completed form is received or dealing with the disqualification of the course director or planner. Difficult situations will be referred to the Chair of the CME Committee. Anyone who refuses to disclose will be disqualified.
  - c. Resolving course director’s or planner’s conflict of interest. The OCME will work with the course director or planner to identify a faculty member with no relevant relationship to review course planning and assure the independence of content. (Discussion can be initiated at course planning meeting.)
3. Speaker disclosure and resolution.
  - a. Disclosure. As soon as the preliminary agenda is established and before the course brochure is printed, the OCME will send the disclosure and attestation form to speakers. The OCME will confirm receipt of forms and inform the course director if 1) an individual fails to return a completed form and 2) an individual has returned a form with a current conflict of interest.
  - b. Failure to provide disclosure. If the speaker does not disclose, the course director must disqualify the speaker.
  - c. Resolving speaker’s conflicts of interest. The OCME will ask the course director to resolve the conflict of interest. The OCME must have documentation of all disclosures and of resolution before the final program in the course syllabus is printed.
4. Disclosure to participants. The OCME will prepare the disclosure information to be included in the syllabus and file documentation in the course file.

## Regularly Scheduled Series (RSS’s)

The above policies and procedures also apply to RSS’s. The time frame should be as follows: At the beginning of the fiscal year, the course director and planning committee members must complete the disclosure and attestation form and submit it with the application for credit. If the course director or planners disclose a potential conflict, the Director of CME will appoint a member of the CME Committee to review and resolve the conflict.

For Tumor Boards and other case-based activities: At the beginning of the fiscal year, the course coordinator should obtain disclosures from those physicians who regularly present cases. Any potential conflicts of interest should be referred to the Office of CME for resolution. The coordinator

should summarize the disclosures and post the summary next to the sign-in sheet at each session of the activity.

For Grand Rounds and activities that have a different speaker each week, the course coordinator should obtain a disclosure from the speaker as soon as the speaker is selected. If the speaker discloses a potential conflict of interest, the course director should resolve the conflict.

### **Relevant ACCME Standards**

2.1 The (CME) provider must be able to show that everyone who is in a position to control the content of an education activity has disclosed all relevant relationships with any commercial interest to the provider. The ACCME defines “relevant financial relationships” as financial relationships in any amount occurring within the past 12 months that create a conflict of interest.

2.2 An individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, a teacher, or an author of CME, and cannot have control of, or responsibility for, the development, management, presentation or evaluation of the CME activity.

2.3 The (CME) provider must have implemented a mechanism to identify and resolve all conflicts of interest prior to the education activity being delivered to learners.

6.1 An individual must disclose to learners any relevant financial relationship(s), to include the following information:

- The name of the individual;
- The name of the commercial interest(s);
- The nature of the relationship the person has with each commercial interest.

6.2 For an individual with no relevant financial relationship(s), the learners must be informed that no relevant financial relationship(s) exist.

### **Methods of Resolving Conflict of Interest**

Conflict of interest can be resolved in several ways:

- Changing the focus of the presentation so that the content is not about products or services related to the commercial entity
- Limiting the presentation to specific areas, such as epidemiology and pathophysiology, in which the financial relationship is not relevant.
- Peer review and revision of the content of the presentation
- Ending the relationship that causes the conflict
- Selecting an alternate speaker
- Omitting recommendations for specific products
- Making recommendations that are based on structured review for best evidence

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