

**Policy for Disclosure of Conflict of Interest  
and  
Procedures for Meeting ACCME Requirements  
Regarding Disclosure and Resolution of Personal Conflicts of Interest  
When Producing CME Courses at  
Southern Illinois University School of Medicine**

**Policy**

It is the policy of the Office of CME at Southern Illinois University School of Medicine to ensure balance, independence, objectivity, and scientific rigor in all its educational activities. All faculty (SIUSOM and guest) 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 spouses, domestic partners, or immediate family members.

\*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.

**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.

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.

## Resources

Office of CME resources include:

- Form: “Conflict of Interest: Disclosure and Attestation” (also defines relevant relationships)
- \* Information sheet: “Implications of New ACCME Requirements for Course Directors”
- Modified “Course Planning Checklist” that includes item about disclosure and resolution under “faculty”
- General letter to faculty explaining new ACCME requirements

## 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

## Timeframes and Responsibilities

Time frames. Disclosure of relevant relationships and resolution of current conflicts of interest should occur in time frames related to role:

Staff in the Office of CME and members of the CME Committee shall complete a faculty disclosure form at the beginning of each fiscal year. A new form should be completed and submitted to the Office of CME if there is anything additional to disclose during the fiscal year.

- For course directors and planning committee members, disclosure and resolution should occur before the overall program content (i.e. topics and speakers) is finalized (i.e. the brochure printed).
- 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 may more appropriately occur before the overall program content (i.e. topics and speakers) is finalized.

Responsibilities. For “regular” CME courses (such as full-day activities) the following responsibilities are typical. An assumption is that for “regular” courses most individuals controlling CME content do not have relevant relationships. Collecting disclosures is primarily

an administrative task. There should be few instances of failure to provide a disclosure and infrequent current conflicts to be resolved.

- Course director. Course directors should be involved in disclosure and resolution processes only when necessary. Course directors should be consulted when others who control content have failed to provide disclosure information after repeated administrative attempts. (Failure to disclose will affect program content because those individuals will not be allowed to participate.) Course directors are responsible for resolving conflicts of interest because those decisions involve judgments about course content.
- Director of CME. The Director of CME is responsible for educating course directors about their responsibilities. The Director of CME oversees the resolution process when the course director has a conflict of interest by identifying an appropriate faculty member who does not have a conflict of interest to review the planned program for balance and absence of bias. The Director of CME will help address unusual circumstances, such as the failure of a speaker to provide a disclosure.
- Meeting Planners. Meeting Planners are responsible for requesting and obtaining disclosure information from course directors, planning committee members, and speakers. Meeting Planners inform the Director of CME when the course director has a conflict of interest or when a speaker fails to provide a disclosure. They inform course directors when speakers have a conflict of interest. Meeting Planners prepare disclosure information for the course syllabus. The Meeting Planners ensure that the course file has documentation of disclosure to the Office of CME, of conflict resolution, and of disclosure to participants.

### **Procedures (sequence) for “Regular” CME Courses**

1. Planning meeting agenda. The Director of CME or a Meeting Planner will explain the ACCME requirements (using the disclosure and attestation form) and the course director’s role in disclosure and resolution.
2. Course director(s) disclosure and resolution.
  - a. Disclosure. The Director of CME or Meeting Planner will provide disclosure forms in the information packets 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 Meeting Planner should send disclosure forms for immediate completion. The Meeting Planner should confirm receipt of forms and inform the Director of CME if a course director either: (1) repeatedly fails to return a completed form or (2) returns 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.
  - c. Resolving course director’s conflict of interest. The Meeting Planner will work with the course director (and chairman of the content division or department if necessary) 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.) If the course director's conflicts are related to conflicts of course planning committee members or speakers, the "reviewer" also assumes the function of the course director in resolving these other individuals' conflicts of interest. The Meeting Planner should have documentation of resolution before a brochure is printed. That documentation should be retained with the disclosures in the course file.

3. Planning committee member disclosure and resolution.

- a. Disclosure. The Director of CME or the Meeting Planner will provide disclosure forms in the information packets for any planning committee members attending 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 Meeting Planner should send disclosure forms for immediate completion. The Meeting Planner should confirm receipt of forms and (1) inform the Director of CME if an individual repeatedly fails to return a completed form and (2) inform the course director if an individual has returned a form with a current conflict of interest.
- b. Failure to provide disclosure. The Meeting Planner will work with the Director of CME, and the course director if necessary, to address the specific circumstances of the situation, assuring that a completed form is received or dealing with the disqualification of the planning committee member.
- c. Resolving planning committee member's conflicts of interest. The Director of CME will ask the course director to resolve the conflict of interest. The Office of CME must have documentation of disclosure and of resolution before a brochure is printed.

4. Speaker disclosure and resolution.

- a. Disclosure. After the course brochure is printed, the Meeting Planner will request disclosure information from speakers, asking for a prompt return of the information. The Meeting Planner should confirm receipt of forms and (1) inform the course director if an individual repeatedly fails to return a completed form and (2) inform the course director if an individual has returned a form with a current conflict of interest.
- b. Failure to provide disclosure. The Meeting Planner will work with the course director to address the specific circumstances of the situation, ensuring that a completed form is received. If a completed form is not received, the course director must disqualify the speaker.
- c. Resolving speaker's conflicts of interest. The Meeting Planner will ask the course director to resolve the conflict of interest, involving the Director of CME if resolution is not received in a reasonable time. The Meeting Planner must have documentation of all disclosures and of resolution before the final program in the course syllabus is printed.

5. Disclosure to participants. The Meeting Planner will prepare the disclosure information to be included in the syllabus.

6. Disclosure documentation. The Meeting Planner will file the forms documenting the disclosure of relationships to the Office of CME and the resolution of conflicts of interest in the

course file. The Meeting Planner will also file a copy of the syllabus, which documents that the Office of CME provided the disclosure information to participants.

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