

Disclosure of Financial Relationships / Conflict of Interest (COI) Policy for Accredited Continuing Medical Education

Purpose

The purpose of this policy is to ensure that all accredited continuing medical education (CME) activities provided or jointly provided by Southern Illinois University School of Medicine are designed and implemented in accordance with the **ACCME Standards for Integrity and Independence in Accredited Continuing Education**. This policy addresses potential conflicts of interest (COI) to maintain the integrity, transparency, and independence of CME content. The Office of Continuing Professional Development will retain records for a minimum of six years.

Scope

This policy applies to all individuals who are in a position to control the content of CME activities, including but not limited to:

- Faculty/presenters
- Course directors
- Planning Committee Members
- Content / Peer Reviewers
- Authors
- Content developers

Definitions

- **Relevant Financial Relationship:** Any financial relationship in any amount occurring within the past 24 months between an individual and an ineligible company (defined by ACCME as those whose primary business is producing, marketing, selling, reselling, or distributing healthcare products used by or on patients).
- **Conflict of Interest (COI):** A situation in which an individual has a financial relationship with an ineligible company that could potentially bias the content of the CME activity.
- **Mitigation:** The process of addressing conflicts of interest to ensure CME content is not influenced by commercial bias.

Policy Requirements

1. Disclosure of Financial Relationships

All individuals in control of CME content are required to disclose all financial relationships with ineligible companies within the past 24 months, regardless of the relevance to the content.

Disclosure must include:

- The name of the ineligible company
- The nature of the financial relationship (e.g., speaker, consultant, advisory board member)
- The timeframe of the relationship

Any individual in control of CME content that refuse to disclose financial relationships with ineligible companies will not be permitted to serve in any role that controls content, including planning committees, faculty, etc.

2. Identification of Relevant Financial Relationships

The Office of Continuing Professional Development (or its designee) will review disclosures to identify relevant financial relationships. A financial relationship is considered relevant when the content of the CME relates to the products or business lines of the ineligible company with which the individual has a relationship.

3. Mitigation of Conflicts

All relevant financial relationships must be mitigated **prior to the individual's involvement** in the planning or delivery of the CME activity.

Mitigation strategies may include:

- Peer review of content for bias and balance
- Additional attestations
- Changing the role of the individual
- Recusal from the activity
- Replacement of the individual if COI cannot be mitigated

Documentation of the mitigation process is required and must be maintained by the Office of Continuing Professional Development for accreditation records.

4. Disclosure to Learners

All relevant financial relationships and mitigation efforts must be disclosed to learners before the start of the CME activity. If no relevant relationships exist, learners will be informed that the individuals in control of content have no relevant financial relationships.

Sample learner disclosure:

“[Name] has disclosed [nature of relationship] with [ineligible company]. This relationship has been mitigated.”

5. Commercial Support & Exhibitors

If a CME activity receives commercial support or includes exhibitors, it must be overseen by the Office of Continuing Professional Development:

- A written agreement will be executed between the Office of Continuing Professional Development and the commercial supporter or exhibitor
- The support must be used in accordance with ACCME guidelines
- Learners must be informed of the source and nature of commercial support

6. Content Integrity

All CME content must be:

- Free from commercial bias
- Based on best available evidence
- Balanced and objective
- Independent of ineligible companies' influence

Non-Compliance

Failure to comply with this policy may result in:

- Removal from the CME activity
- Disqualification from future participation in CME planning or delivery

Policy Review

This policy will be reviewed and updated at least annually, or as needed to remain in compliance with current ACCME requirements.

Last updated: January 5, 2026