



IUSM CME Policy

Disclosures Relevant to Potential Commercial Bias

In accordance with the [Accreditation Council of Continuing Medical Education \(ACCME\)](#), the IUSM CME requires disclosure and management of both individual and institutional financial ties to industry. Disclosure information is used to determine if a conflict exists; resolve the conflict by initiating a content validation process; and, advise learners of the information. The intent is not to prevent an individual who has relationships with or interests in commercial entities from participating, but rather, to insure that such relationships are identified openly and resolved. Disclosing to learners all relevant financial relationships assists learners in forming their own judgments about the presentation and the presence of commercial bias with full disclosure of the facts. This disclosure contributes to the transparency and accountability of the program.

- All individuals who are in a position to control the content of an educational activity are expected to disclose to the audience any “relevant” financial relationships during the past 12 months that may have a bearing on the subject matter of the CME activity.
- Individuals subject to this requirement include, but are not limited to, activity directors and program chairs, planning committee members, CME staff, faculty/speakers/presenters, authors and editors, expert reviewers, moderators, panel members, joint sponsor staff and other educational partners who are in a position to control content.
- Completed disclosure forms must be received and reviewed by the IUSM CME staff at least 30 days prior to the educational activity. An individual who refuses or fails 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. Reminders (calls, e-mails, faxes) shall be sent at reasonable periods prior to the deadline.
- CME staff will complete disclosures on an annual basis.
- The following information regarding relevant financial relationship(s) of all individuals in a position to control CME content will be disclosed to learners: a) the name of the individual; b) the name of the commercial interest(s) with which the relationship exists; and, c) the nature of the relationship the individual has with each commercial interest.
- Disclosures must never include the use of a trade name or a product-group message.
- For an individual with no relevant financial relationship(s), the learners will be informed that no relevant financial relationship(s) exist.
- Any disclosure that reveals a conflict of interest will be resolved prior to the educational activity according to the process outlined in the *Resolution of Conflict of Interest* policy.
- The source of all support from commercial interests will be disclosed to learners. When commercial support is “in-kind,” the nature of the support must be disclosed to learners.

- All disclosure information will be provided to learners prior to the beginning of the educational activity, including any information in which a conflict has been identified and resolved. This information is presented either in a *Disclosure Summary* (for courses) or stated at the beginning of the learning segment for all others.
- CME activities will be evaluated by participants to determine if the content was free of bias and met acceptable scientific standards.
- This policy is in effect irrespective of commercial support of the activity.

Definitions

- *Conflict of Interest*
Circumstances create a conflict of interest when an individual who is in a position to control the content of a CME-credited activity has both a relevant financial relationship with or interest in a commercial interest and has the opportunity to affect CME content about products or services of that commercial interest with which he/she (or spouse/partner) has a financial relationship.
- *Commercial Interest*
The ACCME defines a commercial interest as any proprietary entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients with the exemption of non-profit or government organizations and non-health care related companies.
- *Commercial Support*
Commercial Support is financial or in-kind contributions given by a commercial interest, which is used to pay all or part of the costs of a CME activity. Examples of costs associated with CME activities include speaker honoraria or travel expenses, meeting space, meals, and so forth.
- *Financial relationships*
Financial relationships are those relationships in the past 12 months in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit in any amount. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received or expected. ACCME considers relationships of the person involved in the CME activity to include financial relationships of a spouse or partner.
- *'Relevant' Financial Interests*
ACCME focuses on financial relationships with commercial interests in the 12-month period preceding the time that the individual is being asked to assume a role controlling content of the CME activity. ACCME has not set a minimal dollar amount for relationships to be significant. Inherent in any amount is the incentive to maintain or increase the value of the relationship. The ACCME defines 'relevant' financial relationships as financial relationships in any amount occurring within the past 12 months that create a conflict of interest.