



IUSM CME Policy

Resolution of Conflict of Interest (COI)

Based upon financial disclosures submitted by faculty and planning committee members as defined in the IUSM CME policy on [Disclosures Relevant to Potential Commercial Bias](#), IUSM CME will identify and resolve conflicts of interest identified for any individual who is in a position to influence or control the content of an educational activity. IUSM CME will resolve all conflicts of interest prior to the educational activity being delivered to learners. In the event of a conflict of interest (COI), IUSM CME will notify learners on the *Disclosure Summary* that the conflict of interest has been resolved.

Identification of Conflicts of Interest (COI)

Planning team members must disclose their relevant financial relationships prior to the activity planning using a *Disclosure of Relevant Financial Relationships* form. The speakers, presenters and authors must submit their completed disclosure forms at least 30 days prior to their presentations.

Disclosures are used to determine whether or not a conflict exists. Factors to be considered in identifying whether an individual who is in a position to control the content of an activity has a COI include:

- The focus and content of the educational activity
- The individual's role in the activity
- An individual's past financial relationships with or interests in a commercial entity
- An individual's past financial relationships with or interests in a commercial entity pertaining to content of the activity

Procedure to Resolve Conflicts of Interest (COI)

If the individual has no financial relationship, no further action is required. If the individual has financial relationships with one or more commercial interests, the CME staff assesses potential risk. If a conflict is suspected, the review is forwarded to the Associate Dean or Director of CME for resolution. The activity chair or other IUSM qualified professional reviews the content and completes the *Resolution of Conflict of Interest* form stating action taken. If the individual has a relationship with one or more commercial interests, including relationships with commercial supporters of the CME activity, IUSM CME may identify an independent content reviewer to conduct a secondary review. All joint sponsor activities will have an independent IUSM content reviewer appointed to conduct a secondary review.

Mechanisms to Resolve Conflicts of Interest (COI)

The following are potential mechanisms that can be used to resolve a conflict:

- Change the focus of the presentation so that the content is not about products or services related to the commercial entity
- Review the presentation slides and handouts in light of evidence-based guidelines by the activity chair or a peer and recommend changes if appropriate
- Change the role of the person with a conflict of interest so that it is no longer about products or services of the commercial interest (e.g., address condition, but not treatments)
- Limit the presentation or material to specific areas in which the financial relationship is not relevant (e.g., presentation limited to data/research – someone else address recommendations)
- Ask planners, authors or faculty members to divest themselves of the relationship that is producing the conflict of interest

- Select or substitute an alternate presenter and/or planner with no conflict of interest

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) 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.

Reviewed and Revised: June, 2009