

Keck School of Medicine of USC

Office of Continuing Medical Education

CONFLICT OF INTEREST RESOLUTION POLICY

INTRODUCTION:

The Accreditation Council for Continuing Medical Education (ACCME) requires that all accredited CME providers of CME have a mechanism in place for identifying and resolving potential conflicts of interest prior to an educational activity. The Keck School of Medicine of USC uses financial disclosure forms and CME Disclosure Attestation Forms, which have been reviewed and vetted by the Keck School of Medicine Office of Continuing Medical Education (KSOM OCME), as tools to identify and resolve potential conflicts of interest.

POLICY:

1. All contributors (activity directors, planning committee members, teachers/authors, reviewers and any others planning or participating in CME activities) must complete a Financial Disclosure Form and disclose any relevant financial relationships between themselves and commercial organizations. All disclosures will be shared with the audience prior to the educational activity.
2. Financial Disclosure Forms will be reviewed prior to the CME activity by the KSOM OCME or its designee, in cases of joint sponsorship, and if a conflict exists, an appropriate course of action will be determined and taken.
3. An individual who refuses to disclose relevant financial relationships will be disqualified from being an activity director, planning committee member, or teacher/author of a CME activity and cannot have control of, or responsibility for, the development, management, presentation, or evaluation of CME activity.
4. The KSOM OCME will document in writing how identified or perceived conflicts of interest are resolved.
5. The following mechanisms for resolving conflicts of interest may be used:
 - A. ***Signed Attestation:*** By completing and signing the CME Disclosure Attestation Form, the contributor agrees to comply with all mandatory ACCME disclosure and guidelines and said conflicts or relationships will not bias or otherwise influence their involvement in the CME activity, practice recommendations will be limited to those based on the best available evidence (or absence of evidence), and all recommendations will be consistent with generally accepted medical practice.
 - B. ***Audience Evaluation:*** Attendees will be advised of their right to expect non-biased presentations and queried, following the activity, regarding their impressions concerning bias (or the absence of bias) within the activity. Activity Directors and teachers/authors will receive copies of the evaluation summaries and comments.
 - C. ***Prior Speaker Evaluations:*** Historical data, relating to the particular faculty from previous evaluations, can be used to document status of commercial bias.
 - D. ***Altering Control Over Content:*** An individual's control of CME content may be altered to remove the opportunity to affect content related to the products/services of a commercial interest. Acceptable methods include but are not limited to:
 - ***Select someone else to control that part of the content*** - If a proposed presenter/author has a conflict of interest related to the content, choose someone else who does not have a relationship to the commercial interests related to the content.
 - ***Change the content of the person's assignment*** - The role of a person with a conflict of interest can be changed within the CME activity so that he/she is no longer teaching about issues relevant to the products/services of the commercial interest. For example, an individual with a conflict of interest regarding products for treatment of a disease state could address the pathophysiology or diagnosis of the disease rather than the therapeutics.
 - ***Limit the content to a report without recommendations*** - If an individual has been funded by a commercial company to perform research, the individual's presentation may be limited to the data and results of the research. Someone else can be assigned to address broader implications and recommendations.
 - ***Limit the sources for recommendations to those based on best available evidence*** - Rather than having a person with a conflict of interest present personal recommendations or personally select the evidence to be presented, limit the role of the person to reporting recommendations based on formal structured reviews of the literature with the inclusion and exclusion criteria stated (evidence-based).
 - E. ***Peer Review/Independent Content Validation:*** An informed learner or peer, with no identified conflict of interest, may review content to ensure that the presentation will be independent and balanced and will be presented without bias.
 - F. ***Altering Financial Relationships:*** Contributor's relationship with commercial interest has changed or discontinued, and in doing so, no duty remains to introduce bias into the content. The relationship must be disclosed to learners for 12 months.
 - G. ***Elimination:*** Contributors who are perceived as having conflicts of interest or being biased may be eliminated from consideration as resources (committee members, teachers, authors, etc.) in subsequent certified CME activities.
 - H. ***Firewall:*** The planning and development of educational content for Accredited CME activities are completed by activity directors and planning committees in conjunction with the Office of CME prior to the solicitation of industry / commercial support to ensure educational content is completely independent of industry / commercial influence. Accredited CME activities and industry promotion are physically segregated to ensure that accredited CME activities are independent of influence from commercial interest and serve the public interest. All sources of commercial support will be disclosed to all learners.

This policy will be reviewed annually by the OCME.