SOM OP: 60.04, Identification and Resolution of Conflicts of Interest

PURPOSE: The purpose of this policy is to provide guidance to course directors, CME staff, planning committee members, and presenters regarding the identification and resolution of conflicts of interest in continuing medical education activities.

REVIEW: This policy will be reviewed on September 1st of each odd-numbered year by the Managing Director for Continuing Medical Education. If a revision to the policy is recommended, the CME Committee will review and approve changes.

POLICY/PROCEDURE:

1. **Policy.** It is the policy of Texas Tech University Health Sciences Center's Department of Continuing Medical Education to ensure balance, independence, objectivity, and scientific rigor in all its educational activities. Conflicts of interest occur when planners or presenters have affiliations with pharmaceutical companies, biomedical device manufacturers, or other corporations whose products or services are related to the presentation topic. Any real or apparent conflict of interest related to the content of the continuing education activity shall be disclosed and resolved prior to the presentation.

2. **Procedures.**
   
a. All individuals who are in a position to control the content of an educational activity must complete and sign a disclosure statement. This disclosure is updated annually or upon a change in affiliation with an identified industry support company. (This procedure complies with Standard 6 of the ACCME Standards for Commercial Support.)

b. Persons in a position to control content include course directors, CME staff, planning committee members, and presenters.

c. An individual with no identified affiliations are assumed to have no conflicts of interest, and no restrictions are imposed.

d. A course director or member of a planning committee who has affiliation with a company that has products or services related to the presentation topic shall recuse himself or herself from the control of content of the activity.

e. A presenter with an identified affiliation shall submit an electronic copy of his or her presentation at least 72 hours in advance of the presentation. The project coordinator for the Department of CME shall review content for potential conflict of interest. In the event a possible conflict is identified, the coordinator shall advise the course director. One of the following methods shall be used to resolve the conflict:
1) The course director will conduct a peer review to validate content and ensure fair balance. The presenter’s course presentation and handout materials shall be modified as needed.

2) A qualified presenter without a conflict of interest shall replace the presenter who has the conflict.

3) The presenter with the conflict of interest eliminates his or her affiliation(s) with industry support companies that have ties to the content being presented.

f. The project coordinator shall disclose affiliations and non-affiliations of all presenters to the learners in writing prior to the start of the educational activity.

g. Participants shall evaluate CME activities regarding their perceptions of the presenter’s conflict of interest regarding the topic discussed. If the participants perceive the presence of bias, the course director shall discuss with the presenter. Utilization of the presenter in the future shall be strongly discouraged by the Department of CME.

3. **Restrictions.** An individual who refuses to disclose relevant financial relationships will be disqualified from controlling the planning and production of a CME activity.