



**SOM OP: 60.04 Disclosure and Resolution of Conflicts of Interest**

**PURPOSE:** The purpose of this policy is to provide guidance to course directors, 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 1<sup>st</sup> 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:**

**Policy**

It is the policy of Texas Tech University Health Sciences Center Office of Continuing Medical Education to abide by the ACCME Standards for Commercial Support specifically Standards 2 and 6 and to comply with Criterion 7 of the accreditation criteria. It is the policy of TTUHSC to secure disclosure of relevant relationships with commercial interests from all those who control the content (speakers, authors, planners, etc.) of education activities and will resolve any conflicts of interest prior to the beginning of the activity.

A commercial interest is defined as an entity developing, producing, marketing, re-selling, or distributing health care goods or services used on, or consumed by, patients. Governmental agencies and providers of direct patient care services are not considered to be commercial interests.

**Procedures**

1. Everyone in a position to control the content of a CME educational activity and their spouse/partner will disclose all relevant financial relationships with any ACCME defined commercial interests (including name of the commercial interest and nature of the relationship) using the Disclosure Statement form provided by the Office of CME. A commercial interest is defined as an entity developing, producing, marketing, re-selling, or distributing health care goods or services used on, or consumed by patients. Governmental agencies and providers of direct patient care services are not considered to be commercial interests.
2. TTUHSC Office of CME maintains disclosures on a fiscal year basis. Those who control content and their spouse/partner (planners/presenters) should disclose any relationships that have occurred within the past 12 months that may be applicable from September 1 through August 31. In the event of a change in relationship status, those who control content must notify the CME project manager for his/her activity and complete an updated disclosure statement.
3. Any individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, teacher, or an author of CME, and cannot have control of or responsibility for the development, management, presentation or evaluation of the CME activity.
4. Conflicts of interest occur when those who control content (planners or presenters) have financial relationships with commercial interests (pharmaceutical companies, biomedical device manufacturers, or other corporations) whose products or services are related to the presentation topic. Any conflict of interest related to the content of the continuing education activity shall be resolved prior to the presentation.
5. Any relevant financial relationships that are disclosed will be resolved using a single or combination of methods appropriate for the situation and activity. Possible methods to employ are:

For presenters with a conflict of interest:

- a. Presenters will be advised to use clinical recommendations with the best available evidence from the medical literature.
- b. Presenters will refrain from making recommendations regarding products and services, e.g., limit talk to pathophysiology diagnosis and/or research findings
- c. Presenters will submit their talk/slides in advance to allow adequate time for peer review by non-conflicted person selected by the planning committee.
- d. Presenters may divest themselves of this financial relationship.

For planning committee members:

- a. A conflicted planner will recuse her/himself from participation in planning discussions (speaker selection, area of content and objectives) related to their conflict of interest.
- b. Non-conflicted members of the planning committee may suggest speakers, areas of content, objectives, etc.

Other methods:

- a. Planners/presenters will recommend an alternative speaker for the topic for the planning committees consideration
  - b. The institutional CME Committee may be engaged to review the planners' choices of selection of presenters, content, topics, etc.
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6. Letters to planning committee members and presenters will reflect TTUHSC's commitment to compliance with the ACCME Standards for Commercial Support. Letters to planning committee members and presenters will also set forth the strategies which will be employed to resolve conflicts of interest.
  7. The Office of CME will disclose affiliations and non-affiliations of all those who control content to the learners in writing prior to the start of the educational activity via one or more of the following methods:
    - a. Disclosure flyer in packet/syllabus materials
    - b. Documented disclosure announcement in introductory remarks
    - c. Printed disclosure statement on evaluation
  8. Participants will evaluate CME activities regarding their perceptions of bias or promotion in the education content. 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 Office of CME.