

Managing Conflicts of Interest in Continuing Medical Education Activities

For all accredited CME activities, conflicts of interest must be: identified, managed, shared with participants, and documented. **This process must be completed seven days before the scheduled activity for CME credit to be awarded.**

What is a Conflict of Interest (COI)?

A *Conflict of Interest* arises when an individual has a *relevant financial relationship* with a *commercial interest* whose products or services will be discussed during the course of a CME activity (for example, a pharmaceutical company or medical device manufacturer).

Government agencies, 501-C non-profit organizations, and non-healthcare related companies (i.e., NIH, for-profit hospitals, insurance companies, or book publishers) are not considered commercial interests, and therefore do not cause *Conflicts of Interest*.

Determining COI Management Pathway

There are two ways to manage *Conflicts of Interest*, determined by the content of the proposed activity.

FULL CONFLICT OF INTEREST MANAGEMENT FOR ALL INVOLVED (IDENTIFY, MANAGE, SHARE, DOCUMENT):

Most activities include the potential for discussion of medical products (drugs, devices or services) used on or consumed by patients. **In these cases, all individuals planning or presenting content must disclose the presence (or absence) of relevant financial relationships.** Follow all 4 steps below.

SIMPLE DISCLOSURE TO PARTICIPANTS THAT AN ACTIVITY DOES NOT INCLUDE ANY DISCUSSIONS OF MEDICAL PRODUCTS (SHARE, DOCUMENT):

This is rare in Medical Education but might include purely non-clinical activities such as research conferences or faculty development workshops. **No relationships can exist so there is no need for any individual to undergo full conflict of interest management. However, the absence of relationships for the overall activity must still be disclosed to participants before it begins.** Follow only the Share and Document steps below.

Steps: Identify, Manage, Share & Document



Identify: Do Individuals Have Conflicts of Interest?

All individuals must identify relevant financial relationships (i.e., conflicts of interest) if the content dictates.



Manage All Conflicts of Interest

A *Independent Content Reviewer* (a designated individual without conflicts) must review the content to ensure presentations are free from commercial bias and balanced in content.



Share Information with Participants

Inform participants of the presence (or absence) of conflicts of interest for all individuals associated with the activity.

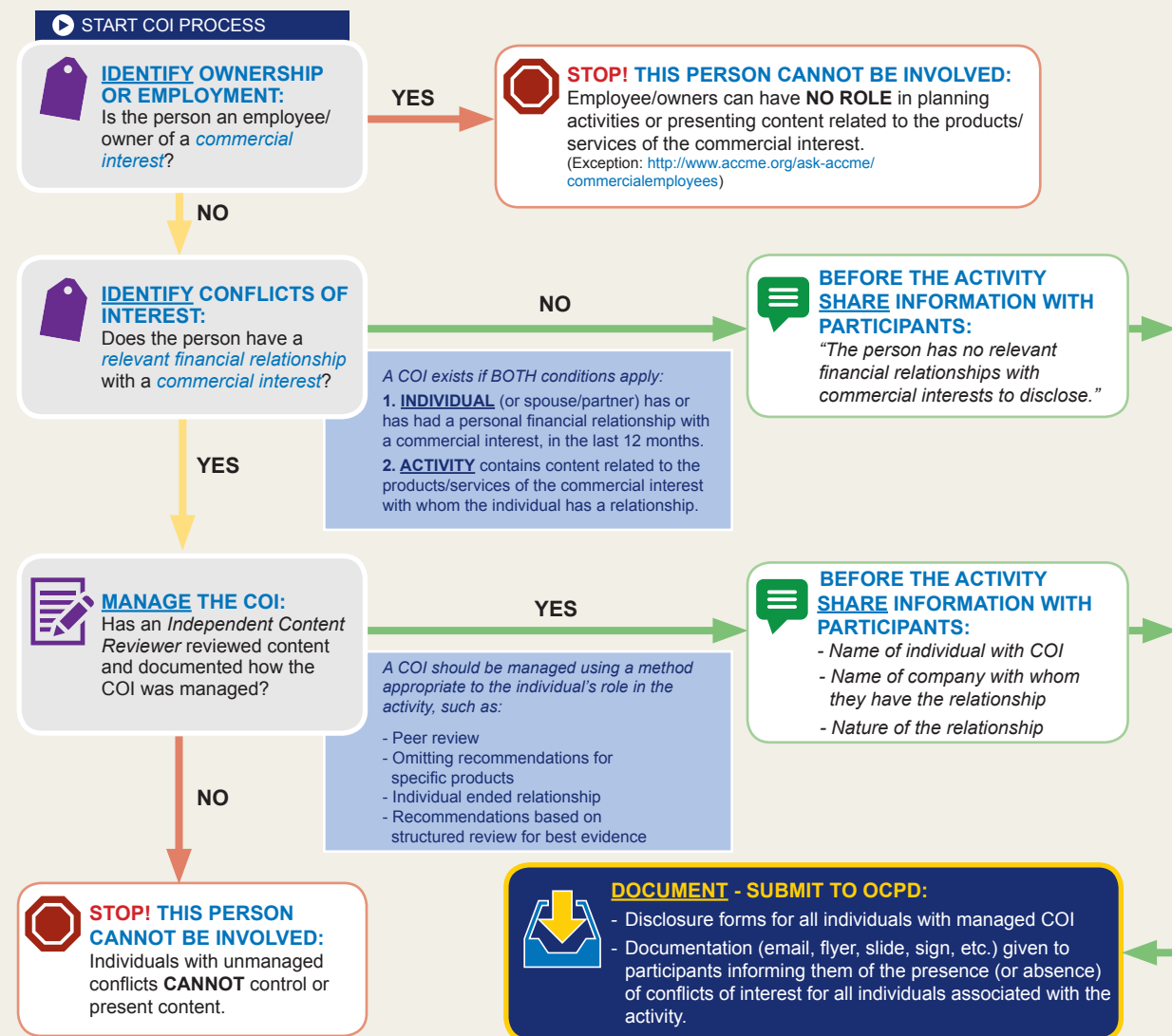


Document: Submit All Documentation to OCME&LL

Documentation must be submitted to OCME&LL.

FULL COI MANAGEMENT:

Activity is clinical in nature; may include discussion of medical products (drugs, devices, or services)



SIMPLE DISCLOSURE TO PARTICIPANTS:

Activity is purely non-clinical in nature; no discussion of medical products (drugs, devices, or services)

