



# CONTINUING MEDICAL EDUCATION POLICY AND PROCEDURE MANUAL

<b>OFFICE OF CONTINUING MEDICAL EDUCATION</b>	
<b>NUMBER:</b>	22
<b>SUBJECT: Identifying and Resolving Conflicts of Interest in CME</b>	
<b>ORIGINATION DATE: 2/05</b>	
<b>CURRENT REVISION DATE:</b>	
<b>PAGE: 1</b>	<b>OF 1</b>

## **SUBJECT: Identifying and Resolving Conflicts of Interest in CME**

In order to meet the Standards for Commercial Support the provider must have a mechanism in place to identify all relevant financial relations with any commercial interest, determine whether these relationships create a conflict of interest with the individual's control of content, and if so have a mechanism to resolve all conflicts of interest prior to the education activity.

1. EVMS CME requires that all individuals involved in planning, authoring, or presenting a CME activity complete the form "Disclosure of Relationships, Identifying and Resolving Conflict of Interest in CME".
2. All presenters are given information describing "content validation" and the expectation that their presentation will be compliant. This is clearly stated on the "Disclosure of Relationships" form.
3. When significant relationships are disclosed and when the content may be influenced by such a relationship, a conflict of interest is determined to exist.
4. Conflicts of interest forms will be reviewed prior to the CME activity by the Office of CME and the appropriate course of action will be determined. This may include review by the course director, planning committee, CME Committee, and/or the specific department.
5. Conflicts of interest can be resolved by
  - A. Altering the financial relationships. Individuals may change their relationships with commercial interests (e.g. discontinue contracted services). This way, no duty, loyalty, or incentive remains to introduce bias into the CME content
  - B. Altering control over CME content. An individual's control of CME content can be altered in several ways to remove the opportunity to affect content related to the products and services of a commercial interest. These include the following:
    - Choosing someone else to control that part of the content.
    - Change the focus of the CME activity.
    - Change the content of the person's assignment so that it is no longer about products or services of the commercial interest.
    - Limit the content to a report without recommendations by limiting it to data and results of research, and assigning someone else to address broader implications and recommendations.
    - Request a peer review to validate content. This is to ensure that all scientific research referred to, reported or used in CME in support or justification of patient care recommendations conforms to the generally accepted standards of experimental design, data collection and analysis.
  - C. Disqualifying the speaker, author or planner and select a replacement.
6. Disclosure of all relationships and the resolution of conflicts of interest will be provided to the CME participants.