

**CINCINNATI CHILDREN'S HOSPITAL MEDICAL CENTER
CINCINNATI, OHIO**

Continuing Medical Education Policy

**DISCLOSURE OF FINANCIAL RELATIONSHIPS
RESOLUTION OF CONFLICT OF INTEREST
PROCEDURES**

The following procedures are in support of the *Disclosure of Financial Relationships and Resolution of Conflict of Interest*.

As stated in the Cincinnati Children's policy, all individuals in a position to influence or control the content of a CME activity are required to disclose any relevant financial relationships in any amount occurring within the past 12 months related both to content and to commercial support of the activity. All identified potential conflicts of interest must be resolved in order for individuals to continue to participate in the CME activity. As a general rule, if individuals question whether a financial relationship is relevant, the relationship should be disclosed. If the financial relationship is not significant, it will be resolved by the CME staff. If an individual has any questions regarding disclosures, they should contact the Cincinnati Children's CME office.

Division CME Activity Requirements

Divisions that contact the CME department regarding a CME activity will be given the following pieces of information:

- *Policy on Disclosure of Financial Relationships and Resolution of Conflict of Interest*
- *Procedures for Disclosure of Financial Relationships and Resolution of Conflict of Interest*
- *Disclosure of Financial Relationships*
- *Resolution of Conflict of Interest*

Each member of the planning committee should complete a *Disclosure of Financial Relationships* form upon their first meeting. Completed forms should be immediately returned to the CME office.

The CME staff, in consultation with the planning committee, will determine a timeframe needed to receive completed *Disclosure of Financial Relationships* forms from all proposed CME presenters. The CME staff will provide all proposed CME presenters with copies of the *Policy on Disclosure of Financial Relationships and Resolution of Conflict of Interest* and the *Disclosure of Financial Relationships*. The CME staff will also communicate the deadline for completed forms to the proposed faculty. A maximum of three reminders for this information will be sent to proposed faculty. The CME staff will keep the planning committee updated on the return rate and any financial relationships disclosed on returned *Disclosure of Financial Relationship* forms.

One week prior to the deadline date, the CME staff will inform the planning committee of any unreturned *Disclosure of Financial Relationships* forms and any unresolved conflicts of interest.

If a potential CME presenter does not complete the *Disclosure of Financial Relationships* form within the agreed upon timeframe, the planning committee will either:

remove and/or replace the proposed faculty member, or

decide that the individual will remain on the agenda, and the activity will not receive CME credit. If part of an activity is refused CME credit, it shall be communicated to the learner.

Prior to the beginning of the CME activity, CME staff will communicate to learners all disclosure information received from all individuals in a position to influence and/or control CME content. Although it is not necessary to disclose how potential conflicts were resolved, the following statements will be communicated to the learner (if applicable):

No conflicts of interest:

“Planning committee members and/or faculty were determined to have no conflicts of interest pertaining to this activity.”

Conflicts of interest:

If a conflict of interest exists for either a member of the planning committee and/or a presenter, the following information should be communicated to the learner:

- The name of the individual
- The name of the commercial interest
- The nature of the relationship the individual has with each commercial interest

In addition, the following sentence should be communicated: “All planning committee members’ and/or faculty’s identified conflicts of interest pertaining to this activity were resolved prior to the activity.”

All CME activities will be evaluated to determine the perception of commercial bias. Evaluation methods may include evaluation form, peer-review, and activity monitoring.

Any concerns as a result of these evaluation methods should be handled accordingly including possible disqualification in future CME activities.

Disclosure of Financial Relationships and Resolution of Conflicts of Interest for all individuals in a position to influence or control the content of a CME activity, including planning committee members and CME presenters

CME staff will forward the *Policy on Disclosure of Financial Relationships and Resolution of Conflict of Interest* and the *Full Disclosure Statement Form* to all individuals in a position to influence or control the content of a CME activity. All individuals in a position to influence or control the content of a CME activity are required to complete and return the *Full Disclosure Statement Form* to the CME department.

If the individual is a planning committee member, any financial relationship identified that could impact the content during the planning process will require that the planning committee member recuse him/herself from the discussion.

If the individual does not complete the required disclosure information by the deadline date, s/he will be ineligible to continue to participate on the planning committee and/or to present. If applicable, the planning committee or division will be informed of the individual's ineligibility. They will either:

remove and/or replace the individual, or

decide that the individual will remain, and the activity will not receive CME credit. If part of an activity is refused CME credit, it shall be communicated to the learner.

CME staff will review completed disclosure information from the individual. If s/he has no potential conflict to resolve (no relevant financial relationships), the individual will be confirmed.

If the individual has a potential conflict of interest, the following steps will be used for resolution:

- If the financial interest cited does not relate to the CME activity, the individual will be confirmed. The resolution will be documented and placed in the activity folder.
- If the financial interest cited does relate to the CME activity and suggests a possible conflict of interest, the CME staff will contact the planning committee and/or division to review the existing mechanisms to resolve conflict of interest. If the possible conflict of interest relates to the planning committee, the CME staff will consult with the CME Medical Director.
- If the mechanisms in place are sufficient and a conflict of interest is not identified, the individual will be confirmed. The resolution will be documented and placed in the activity folder.
- If the mechanisms are not sufficient, and there is still the possibility of conflict of interest, the CME staff will contact the individual to obtain further information. If by using the additional information, the CME staff determines that there is no conflict of interest, the individual will be confirmed. The resolution will be documented and placed in the activity folder.

If by using the additional information, the CME staff determines that there is a conflict of interest that cannot be resolved, the CME committee will be notified. Upon committee review, it will be decided whether the conflict is unresolvable. If the conflict is resolvable, the individual will be confirmed. The resolution will be documented and placed in the activity folder. If the conflict is unresolvable, the individual will be ineligible. If the individual is ineligible, the planning committee and/or division will be informed of the individual's ineligibility. They will either:

remove and/or replace the individual, or

decide that the individual will remain, and the activity will not receive CME credit. If part of an activity is refused CME credit, it shall be communicated to the learner.

The resolution will be documented and placed in the activity folder.

If there is an extenuating circumstance requiring the last-minute addition of a presenter, disclosure must still be obtained and reviewed, and potential conflicts of interest, if any, must be identified and resolved. If time does not permit correction of written materials in which disclosure information is communicated, disclosure for the presenter must be made verbally prior to the presentation and noted in the activity file.

The CME staff will report the number of potential conflicts and their resolution to the CME committee on a regular basis.