

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

Continuing Medical Education Policy

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

PURPOSES:

1. To ensure quality, objective CME activities through the use of objective and evidence-based content
2. To ensure compliance with accreditation requirements of the Ohio State Medical Association (OSMA)/Accreditation Council for Continuing Medical Education (ACCME) and recommendations of the FDA, especially with regard to pharmaceutical products
3. To provide activity participants with disclosure regarding planning committee and faculty involvement with commercial parties that may impact the information presented

POLICY:

Circumstances can create a conflict of interest when an individual has an opportunity to affect CME content about products or services of a commercial interest with which s/he has a financial relationship.

All individuals in a position to influence or control the content of a CME activity, including but not limited to, faculty and activity planning groups/committee members and CME committee members, are required to disclose to the CME department and to the learner any relevant financial relationships in any amount occurring within the past 12 months related both to content and to commercial support of the activity, including:

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

Disclosure should only include the parent or corporate name of the commercial interest, not a trade name or product-group message.

Only relevant financial relationships with a commercial interest should be disclosed. A “commercial

interest” is defined as a “proprietary entity producing health care goods or services, with the exception of non-profit or government organizations and non-health care related companies. The ACCME does not consider providers of clinical service directly to patients to be commercial interests.

A “financial relationship” is defined as relationships in which the individual and/or the individual’s spouse or partner, benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (ie stocks, stock options or other ownership interest, excluding mutual funds), or other financial benefit. Relevant financial relationships are financial relationships in any amount occurring within the past 12 months.

All identified potential conflicts of interest must be resolved in order for individuals to continue to participate in the CME activity. The resolution process and outcomes must be documented in the CME activity file.

The following mechanism(s) may be used to resolve potential conflicts of interest prior to the CME activity:

- The best available evidence is used to support the presentation.
- A peer review process is used to review content prior to the presentation.
- Content will be altered to eliminate the conflict.
- The individual eliminates his/her relationship with the commercial interest.
- The individual is replaced as a presenter, organizer, etc..

In addition, all CME activities will be subject to monitoring for compliance with this policy and for peer-review for potential commercial bias.

Individuals failing to disclose relevant financial relationships on a timely basis and/or refusing to comply with the *Disclosure of Financial Relationships/Resolution of Conflict of Interest* policy will be excluded from participation in the CME activity or CME credit will be denied to the activity.