

I. Policy

Disclosure and Resolution Policy

To outline a process for assuring the Commercial Support Guidelines from ACCME relative to Planner and Faculty disclosure and resolution are met routinely.

II. Purpose

All conflicts of interest must be resolved prior to planner or faculty controlling any content approved for *AMA PRA Category 1 Credit™*.

III. Definitions

- A. ACCME – Accreditation Council for Continuing Medical Education is the nationally recognized accrediting agency for continuing medical education.
- B. *AMA PRA Category 1 Credit™* – AMA’s Physician’s Recognition Award Credit System; also, referred as Category 1 CME.
- C. CMA – California Medical Association is an advocacy organization active in the legal, legislative, reimbursement and regulatory areas on behalf of California physicians and their patients.
- D. CME – Continuing Medical Education: Educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public, or the profession.
- E. CME Provider – Hospitals, professional societies and other entities that provide accredited CME to physicians.
- F. Planner – Anyone in a position to control (design, make changes to) content during the planning stages of a CME activity.
- G. Author – Anyone who controls content for a CME activity that is of a written nature.
- H. Commercial Interest – “Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.”
- I. Relevant Financial Relationships (RFR) – Those relationships in which the individual benefits in any amount by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g. Stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, clinical trials, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received or expected. ACCME considers relationships of the person involved in the CME activity to include financial relationships of a spouse or domestic partner.
- J. Conflict of Interest (COI) – A relationship with a commercial interest (a) that benefits the individual in any financial amount and (b) that has occurred in the past twelve (12) months;

and the opportunity to affect the content of CME about the products or services of that commercial interest.

- K. Resolution of Conflict of Interest – To alter the financial relationship with the commercial interest; and/or alter the individual's control over the CME content about the products or services of the commercial interest.

IV. Procedure

- A. The CME Coordinator sends a Faculty Disclosure Form and a copy of the ACCME Standards on Commercial Support to all faculty.
- B. CME Committee member planners are given a new Planner Disclosure Form each year and asked to complete and sign it.
- C. Planner Disclosure forms asks for disclosure of all RFRs that could possibly become a COI in any topic that may be approved for CME credit.
- D. Faculty are asked for disclosure of any RFRs relating to the specific topic being presented.
- E. At each CME Committee meeting member planners are asked if their disclosures have changed since the last meeting and are reminded that if they have any RFRs relative to the activities planned, they need to recuse themselves from planning content.
- F. Any planner, faculty, or author not willing to make disclosure will not be allowed to control content of any CME activity.
- G. Any planner with a RFR that becomes a COI must recuse him/herself from controlling content in any manner.
- H. Faculty/Author who list RFRs, whether or not the RFRs are COIs, will be required to submit his/her PowerPoint slides and/or other written materials to the CME Coordinator at least one week prior to the scheduled activity.
- I. CME Coordinator will submit the PowerPoint slides and/or written materials to a physician member of the CME Committee.
- J. A copy of the review, approval, request for change, etc. of the slides and/or written materials will be kept in the activity file until after the next IMQ survey of the CME program.
- K. If review of slides/materials reveals any type of bias, the faculty/author will be asked to make necessary changes to removed bias.
- L. If faculty/author does not make requested changes, prior to the activity, the activity will not be given CME credit.
- M. A disclosure statement of all who controlled content must be made to the learners prior to the start of the activity either in writing or verbally.
- N. Disclosure must include the following:
 1. Name of planner, faculty, author who has or does not have a RFR
 2. Whether the RFR is a COI
 3. The type of RFR
 4. The commercial company with which the RFR exists
 5. How the COI was resolved

6. Whether or not a commercial grant was received for the activity

- O. Written attestation of verbal disclosure of the above must be signed, placed in the activity file within 30 days, and kept in the activity file until after the next IMQ survey of the CME program.
- P. Proof of written disclosure must be kept in the activity file until after the next IMQ survey of the CME program.

V. References

- A. ACCME Standards for Commercial Support
- B. IMQ/CMA CME Accreditation Standards Manual

VI. Cross-References

- A. None.

VII. Associated Documents

- A. Planner Disclosure Form
- B. Faculty Disclosure Form
- C. Disclosure Statement

VIII. Approvals

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| A. CME Committee | March 15, 2012, March, 2017 |
| B. Medical Executive Committee | April 10, 2012, April 11, 2017 |
| C. Board of Directors | April 17, 2012, April 25, 2017 |