

**Office of Continuing Medical Education
University of Virginia School of Medicine
Planning Committee/Faculty/Author Disclosure**

Policy

The University of Virginia School of Medicine, as an ACCME accredited provider, endorses and strives to comply with the Accreditation Council for Continuing Medical Education Standards of Commercial Support, Commonwealth of Virginia statutes, University of Virginia policies and procedures, and associated federal and private regulations and guidelines on the need for disclosure and monitoring of proprietary and financial interests that may affect the scientific integrity and balance of content delivered in continuing medical education activities under our auspices.

The University of Virginia School of Medicine requires that all CME activities accredited through this institution be developed independently and be scientifically rigorous, balanced and objective in the presentation/discussion of its content, theories and practices.

Definition of Conflict of Interest (COI)

According to the ACCME Standards of Commercial Support (approved September 2004), a **conflict of interest** is present when individuals in a position to control the content of CME (or their spouses/partners) have a relevant personal financial relationship with a commercial entity that benefits the individual and may ultimately bias the presentation of that content to colleagues and participants. These factors listed below serve as part of the foundation for development of fair and balanced education:

- both a financial relationship (in any amount) with a commercial interest occurring within the past 12 months
- and the opportunity to affect the content of CME about the products or services of that commercial interest.

These relationships must reflect **direct** relationships between the proprietary entity and the individual. The nature of the relationship and its effect on the individual's primary professional role, commitments and responsibilities on the content of the continuing medical education activity must be considered during the planning phase of the CME activity and communicated to participants.

Examples of **direct** relationships may be found in the following scenarios:

- Employment, management positions
- Independent contractor (contracted research and clinical trials)
- Consultant
- Speaker's Bureaus and teaching engagements
- Membership on Advisory Committees or review panels
- Other activities when remuneration is received or expected

In all these situations, the individual may receive financial benefits that can be described as salary (retainer), royalties, intellectual property rights, consulting fees, honoraria, ownership

interests (stocks, stock options, etc. excluding diversified mutual/retirement funds not under the individual's control).

The Role of the ACCME Accredited Provider

The University of Virginia Office of Continuing Medical Education, as the designated ACCME entity for the School of Medicine, is responsible for creating a mechanism to identify, review and resolve all conflicts of interests for **all individuals involved in the planning and implementation of an ACCME accredited CME activity.**

The University of Virginia Office of Continuing Medical Education incorporates the following strategies as part of the overall planning process:

- Identify the presence or absence of any financial relationship that may constitute a potential conflict of interest for all individuals involved in the planning and implementation of the proposed CME activity (planning committee members, faculty presenters, etc.).
- Failure of any individual to provide disclosure immediately disqualifies that individual from participation in the planning and/or implementation of the proposed CME activity.
- Implement educational planning and design strategies that work to ensure that content is scientifically rigorous, evidenced-based and balanced, and reflects the current standards of care and/or future directions of medicine and healthcare.
- Monitor and manage its continuing medical education activities in accordance with the current standards, regulations and guidelines outlined by the constituencies involved in the delivery of continuing medical education, research and patient care.
- Document the processes for needs assessment, content validation, and educational design that provide for fair and balanced discussion of the desired topics.
- Foster opportunities for interactivity; differences of opinion and/or dialogue which we believe serve as the foundation for professional development and continuous improvement in approaches to patient care.
- Monitoring the execution of CME activities to validate the presence/absence of commercial bias and the consistent application of the standards of quality education for physicians and other healthcare professionals.

Procedures for Managing Conflict of Interest

1. Disclosure and Resolution

The University of Virginia Office of Continuing Medical Education identifies the presence or absence of relevant financial relationships for all planning committee members, course directors, invited faculty presenters/authors, and staff through the use of a standardized disclosure form. If a COI is identified, one of the mechanisms listed below may be used to resolve it:

- A. **Alter financial relationships** – Individuals may choose to discontinue or alter their relationship with a commercial entity and eliminate any bias associated with the proposed CME content.

- B. **Alter control over content** – The individual and/or UVA CME can elect to alter the educational design, format or content or individual responsibilities to maintain the scientific rigor, integrity and balance of the CME activity. These options include:
- Select someone else to present/author that portion of the content.
 - Alter the focus of the CME activity in a way that broadens the discussion and focuses on the patient care issues rather than the characteristics/influence of products or services.
 - Alter the individual’s responsibilities in planning and implementation to areas that are not related to products and services—for example, limit discussion to pathophysiologic basis of specific conditions.
 - Limit the content to a report on the “current state of the art” without recommendations.
 - Limit the sources of recommendations to evidence-based sources that provide systematic and clearly defined parameters.
- C. **Peer-Review of Content** – Independent review and validation of content can verify the scientific bases and integrity of the content as well as the consistency with the overall educational design. Peer review will follow these two standards:
- **Clinical medicine** recommendations will be based on evidence currently accepted within the profession of medicine as acceptable justification for indications and contraindications for the care of patients.
 - **Scientific research** referenced, utilized and/or included in CME activities will conform to generally accepted standards of experimental design, data collection and analysis.

2. Educational planning and design of CME activities

The University of Virginia Office of Continuing Medical Education will continue its longstanding practice of integral involvement in all of its CME accredited activities. The planning processes for both direct and jointly sponsored activities require early involvement of the UVA CME office, active participation in the development and implementation of the CME activity and overall financial management/supervision of these activities.

Specific strategies have been highlighted as consistent elements in the UVA CME management of its CME activities. These approaches include:

- A. Implement educational planning and design strategies that work to ensure that content is scientifically rigorous, evidenced-based and balanced and reflects the current standards of care and/or future directions of medicine and healthcare.
- B. Monitor and manage its continuing medical education activities in accordance with the current standards, regulations and guidelines outlined by the constituencies involved in the delivery of continuing medical education, research and patient care.
- C. Document the processes for needs assessment, content validation, and educational design that provide for fair and balanced discussion of the desired topics

- D. Foster opportunities for interactivity, differences of opinion and/or dialogue which we believe serve as the foundation for professional development and continuous improvement in approaches to patient care.
- E. Monitor the execution of CME activities to validate the presence/absence of commercial bias and the consistent application of the standards of quality education for physicians and other healthcare professionals.

3. Situations where Conflict of Interest cannot be effectively resolved

While the University of Virginia Office of Continuing Medical Education strives to be flexible, accessible and helpful in the development and implementation of accredited CME activities, there are some situations where adequate resolution of COI may not be possible. Several examples of these situations include:

- Requests for CME credit by individuals and/or groups after the planning for the CME activity has occurred with faculty and/or content selections already determined
- Short planning timeframes that don't permit adequate planning and implementation of required ACCME and UVA CME policies and procedures
- Inappropriate processes in educational planning and/or financial management that are not consistent with ACCME, Commonwealth of Virginia and/or UVA CME policies and processes.

Approved by the UVA CME Committee May 2005