

# PROCEDURES FOR DISCLOSING AND RESOLVING CONFLICT OF INTEREST

Office of Continuing Professional Development and Evaluation Studies, VCU  
School of Medicine (CPDE)

August 30, 2005

## **HISTORY:**

In September, 2004, the Accreditation Council for Continuing Medical Education (ACCME) issued Updated Standards for Commercial Support of Continuing Medical Education (Standards). Under the previous Standards, speakers/authors participating in activities designated for **AMA Category 1 Credit™** by the VCU School of Medicine were merely asked to disclose *whether* they had any *significant* financial relationships with commercial interests who were supporting the activity, or whose products, devices, or services speakers/authors might *discuss* in their presentations. Information from these disclosures was announced/published in detail to participants of the activity.

## **NEW POLICY:**

Effective with all activities planned beginning May 1, 2005 and later, all Speakers, Course Directors/Program Chairs, Planning Committee Members, Moderators, Authors/Editors, and any others "in a position to control content" must disclose any financial relationships they may have with commercial interests *relevant* to their roles or presentations in the program development/delivery. Since all relevant financial relationships are considered conflicts of interest (COIs), all such COIs must be **resolved** and the method(s) of resolution must be reported to the audience. Examples of how COI can be resolved are provided on the accompanying *Conflict of Interest Disclosure Form*.

## **INSTRUCTIONS TO PRESENTERS/AUTHORS/MODERATORS:**

CPDE requires all those involved in these roles of an activity:

- To disclose their relevant financial relationships with commercial interests, and
- attest that **either** no clinical recommendations will be made regarding products or services relevant to their COI, **or**
- attest that their program content will be supported by the best evidence available from all sources.

Additionally, CPDE reserves the right to submit all educational content to peer review to further verify its objectivity and scientific rigor.

## **INSTRUCTIONS TO PLANNING COMMITTEE MEMBERS/PROGRAM COORDINATORS:**

CPDE requires all those involved in the planning and logistics of a CME activity to disclose their relevant financial relationships with commercial interests, and that they will:

- either, recuse themselves from influencing any aspect of the program planning where topics and speakers are recommended or selected, or
- attest that their relevant financial relationships with commercial interests will not affect the portions of the program over which they may exert control

Decisions under these policies and procedures are under the authority of the Associate Dean for CPDE, with appeals to the Dean, SOM, and all decisions of the Dean being final.

**Refusal to submit a timely disclosure will result in the prohibition of that individual's participation in the activity; or that activity or pertinent segment of the activity will not be designated for credit.**