Flowchart for the Identification and Mitigation of Personal Conflicts of Interest for certified CME

ACCME ACCREDITED

THE UNIVERSITY OF TENNESSEE HEALTH SCIENCE CENTER
COLLEGE OF MEDICINE - KNOXVILLE
CONTINUING MEDICAL EDUCATION

Every person in control of content (planners, course directors, and speakers) for the CME activity must provide **disclosure** prior to the activity.[2]

START

Is the person an employee or owner of an ACCME-defined ineligible[1] company?

NO

Does the person have a relevant financial relationship with an ACCME-defined ineligible company[3]?

NO

The absence of relevant financial relationships with ineligible companies will be disclosed to learners.

DONE

Yes

STOP! Employees or owners of ACCME-defined ineligible companies can have **NO ROLE** in the planning or implementing of a CME-certified activity related to their products/services

Yes

Mitigation is conducted with the use of a Content Review Form[4]. The disclosure form will be reviewed, along with the presentation slides (if relevant).

The relationship(s) will be disclosed to learners:

- **Name if Individual**
- **Nature of Relationship**
- **Company**

DONE

1. The ACCME defines ***ineligible companies*** as those whose primary business is producing, marketing, selling, re-selling, or distributing health care goods or services used by or on patients.

2. There is no minimum threshold for financial ***disclosures***; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies within the past 24 months. Individuals must disclose regardless of their view of the relevance of the relationship to the education.

3. Financial relationships of any dollar amount are defined as ***relevant*** if the educational content is related to the business lines or products of the ineligible company.

4. Non-conflicted activity directors and/or independent reviewers are responsible for ensuring that all CME-certified activities are compliant with the ACCME Standards for Integrity and Independence in Accredited Continuing Education and thus, will review the disclosed financial relationships for all who are in control of the activity content. This ***mitigation*** process includes non-conflicted co-activity directors, planning committee members, speakers, and content reviewers.