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# Conflict of Interest Disclosure Policy and Mitigation Process

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## Introduction

As part of our commitment to maintaining the integrity and independence of our accredited continuing medical education (CME) activities, we adhere to the Standards for Integrity and Independence in Accredited Continuing Education as established by the Accreditation Council for Continuing Medical Education (ACCME).

## Collection of Information

All planners, faculty, and others in control of educational content are required to disclose all financial relationships with ineligible companies (see Glossary) within the past 24 months. This includes any financial relationships, regardless of the amount, with companies whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

## Identification of Relevant Financial Relationships

The ACOS reviews all disclosed financial relationships to determine their relevance to the educational content. Financial relationships are considered relevant if the educational content is related to the business lines or products of ineligible companies.

## Exclusion of Owners and Employees of Ineligible Companies

Individuals who are owners or employees of ineligible companies are excluded from controlling content or participating as planners or faculty in accredited education, except in specific circumstances outlined in Standard 3.2 of the ACCME Standards. These exceptions include situations where the content of the activity is not related to the business lines or products of their employer/company, or when the content is limited to basic science research and does not involve care recommendations.

## Mitigation of Relevant Financial Relationships

Appropriate steps, such as peer review and content validation, are taken to mitigate relevant financial relationships before individuals assume their roles. This includes ensuring that content is free from commercial bias and that all recommendations are based on current science, evidence, and clinical reasoning.

## Documentation and Disclosure to Learners

ACOS documents the steps taken to mitigate relevant financial relationships and discloses information to learners. Disclosures include:

- Names of individuals with relevant financial relationships
- Names of ineligible companies
- Nature of the relationships
- Statement that all relevant financial relationships have been mitigated

## Glossary of Terms

**Ineligible Company:** An ineligible company is one whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. For specific examples of ineligible companies, visit [accme.org/standards](http://accme.org/standards).

## Examples of Financial Relationships Include:

- Advisory Board/Fees

- Consulting/Consulting Fees
- Expenses/Food & Beverage
- Grants/Research
- Materials/Equipment
- Speakers Bureau/Honorarium
- Royalties/Patent
- Employment/Salary
- Founder/Owner
- Management Position/Medical Director/CMO
- Equity Interest/Stocks in Privately Held Company
- Stock Options in Privately Held Company
- Stocks/Shares in Publicly Traded Company

Financial relationships with ineligible companies in the 24-month period preceding the date of the request for information must be disclosed. ACCME has not set a minimal dollar amount for relationships to be relevant. Inherent in any amount is the incentive to maintain or increase the value of the relationship.

### **Contact Information**

For any questions, please contact:

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