Policy on Collection and Resolution of Conflict of Interest

1.0 PURPOSE

In accordance with the ACCME Standards for Commercial Support of Continuing Medical Education updated on September 27, 2004, the Policy on Collection and Management of Conflict of Interest exists to provide guidance for staff, instructors, planners and managers of CME activities sponsored by Beth Israel Medical Center and St. Luke’s & Roosevelt Hospitals (BIMC & SLRHC). This policy addresses the underlying philosophy of disclosure to learners, mechanisms to collect disclosure information and the parties from which COI shall be collected, the mechanisms to resolve COI, and requirements to make actual disclosure to learners.

2.0 GUIDING PRINCIPLES RELATING TO COI AND ITS DISCLOSURE

BIMC & SLRHC is guided by what is in the best interest of the public, always deferring to independence from commercial interests, independence and keeping CME separate from product promotion. – These are the basic guiding principles for the collection and management of COI.

3.0 POLICY

3.1 Identifying Conflict Of Interest

1. A Conflict of Interest Disclosure Form shall be provided to individuals involved with a CME activity that have the following roles:
   - Instructor/Faculty
   - Planner/Course Director
   - Manager of the content/development of the CME activity (not logistics)

2. Recipients of COI forms must complete and return the document within two weeks of receiving it as a condition for participation in the role of Course Director, planner or faculty/instructor for the CME activity
3.2 Thresholds for COI
1. Any personal financial relationship during the previous 12 month period represents a potential conflict of interest, and therefore must be reported. This also includes spouses and life partners.
2. A COI is present when both (a) the relationship is financial and occurred within the past 12 months and (b) the individual has the opportunity to affect the content of CME about the products or services of that commercial interest.
3. This does not include employees of educational institutions or hospitals that receive grants as part of their employment.

3.3 Elimination of COI Through Careful Advance Planning
1. COI issues can be eliminated when potential instructors and planners chosen do not have a significant financial relationship with commercial interests supporting the CME activity
2. If initial information about a potential instructor or planner identifies financial relationships that produce a conflict, then the COI must be resolved, or the individual must rescue himself/herself from participation in the area of the conflict.

3.4 Processing COI Forms
1. The Course Director has primary responsibility for processing COI forms and resolving evident COI as reported on the forms.
2. Options for resolution of COI include:
   - Substitution of a person with no COI or minimal levels of COI
   - Use of a stringent Peer Review Process in which content is validated for fair balance
   - Referencing the best available evidence in all CME activities in which potential conflicts exist
   - Relegating the person with COI to a role in which therapeutic options will not be recommended
   - Excluding that part of the instruction from receiving CME credits
   - Requesting the instructor or planner to sever financial relationships with the commercial interest
3. The Course Director will defer a final decision on controversial cases to the CME Committee.

3.5 Documenting Resolution of COI
1. Completed COI Disclosure Forms will be maintained in the activity file
2. The resolution of COI by staff and/or the CME Committee will be documented in writing and will be included in the activity files.

4.0 IMPLEMENTATION

4.1 For Instructors
1. COI Disclosure Forms will be attached to the Faculty Letter with clear instructions on due dates for submission to the CME department.

4.2 For Planners and Course Directors
1. As soon as planners and Course Directors for the activity are identified – whether they are from SLRHC & BIMC or an educational partner – a COI Disclosure Form must be provided to them in writing with instructions to complete and immediately return.

4.3 For Regularly Scheduled Conferences (RSC)
1. The RSC’s Course Director will review potential speakers either weekly or annually (for repeat faculty), to determine COI for speakers.
2. The RSC Manager and the Manager of CME, together with the Course Director, will resolve identified conflicts and document that process for the files.

4.4 Inclusion in Continuous Quality Improvement Briefing to the CME Committee
1. A summarization of COI actions shall be provided to the CME Committee.
2. The results of the discussion shall be documented for the files and include:
   - Issue identified
   - Actions taken
   - Changes to the system that were implemented