UC San Diego CME Conflict of Interest Policies and Procedures

CONFLICT OF INTEREST POLICY FOR PROGRAM PLANNERS, SPEAKERS AND AUTHORS OF CONTINUING MEDICAL EDUCATION (CME) ACTIVITIES

The Mission of the University of California, San Diego Continuing Medical Education (UCSD CME) is to provide needs based education for physicians and health care providers to improve knowledge, competence and performance and enable the optimum provision of health care.

UCSD CME requires that the content of CME activities and related materials provide balance, independence, objectivity, and scientific rigor. Planning must be free of the influence or control of a commercial entity, and promote improvements or quality in healthcare. All recommendations in CME activities involving clinical medicine must be based on evidence accepted within the medical profession. All scientific research used to support patient care recommendations must conform to generally accepted standards of experimental design, data collection, and analysis.

Conflict of interest is created when individuals in a position to control the content of CME, or their spouses/partners, that have a relevant personal financial relationship within the past 12 months with a commercial interest that produces, markets, re-sells, or distributes health care goods or services consumed by, or used on patients that benefit the individual in any financial amount and therefore, may bias their opinions and teachings. This may include receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research and clinical trials), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities for which remuneration is received or expected.

UCSD CME providers will identify, review and resolve all conflicts of interest that persons involved in the development, management and presentation disclose prior to an educational activity being delivered to learners. Individuals who fail or refuse to disclose relevant financial relationships will be disqualified from the CME activity.

Conflicts of interest may be resolved by 1) altering the financial relationship with the commercial interest, 2) altering the individual’s control over CME content about the products or services of the commercial interest, and/or 3) validating the activity content through independent peer review. Persons in a position to control the content of CME must attest to content objectivity.
Identified conflicts of interest will be disclosed to CME activity participants. Activities will be evaluated by participants and in some cases peer reviewers to determine if the content was free of commercial bias and met acceptable scientific standards.

(continued)

UCSD CME PROCEDURES FOR MANAGING CONFLICT OF INTEREST (COI)

Disclosure and Resolution

UCSD CME will identify relevant financial relationships prior to awarding AMA PRA Category 1 Credit™ for CME activities. All persons in a position to influence or control CME content (course directors, program planning committee members, speakers, authors, and staff) will complete a standardized disclosure form. Information about funding will be requested to identify CME activities at higher risk for commercial bias.

The disclosure form will request relevant financial relationships. If a COI is identified, one of the mechanisms below will be used to resolve it.

A. **Altering financial relationships.** Individuals may change their relationships with commercial interests (e.g., discontinue contracted services), thereby eliminating any conflict of interest related to the CME content.

B. **Altering control over content.** An individual’s control of CME content can be altered in several ways to remove the opportunity to affect content related to the products and services of a commercial interest. These include the following:

   - Choose someone else to control that part of the content. If a proposed presenter or planner has a conflict of interest related to the content, someone else who does not have a relationship to the commercial interests related to the content may present or plan this part of the content.

   - Change the focus of the CME activity so that the content is not about products or services of the commercial interest that is the basis of the conflict of interest.

   - Change the content of the person’s assignment so that it is no longer about products or services of the commercial interest. For example, an individual with a conflict of interest regarding products for treatment of a condition could address the pathophysiology or diagnosis of the condition, rather than therapeutics.

   - Limit the content to a report without recommendations. If an individual has been funded by a commercial company to perform research, the individual’s presentation may be limited to the data and results of the research. Someone else can be assigned to address broader implications and recommendations.
• Limit the sources for recommendations. Rather than having a person with a conflict of interest present personal recommendations or personally select the evidence to be presented, limit the role of the person to reporting recommendations based on formal structured reviews of the literature with the inclusion and exclusion criteria stated (‘evidence-based’). For example, the individual could present summaries from the systematic reviews of the Cochrane Collaboration.

C. **Independent Content Validation** – Conflict of interest may be resolved if the CME material is peer reviewed and:

• All the recommendations involving **clinical medicine** are based on evidence that is accepted within the profession of medicine as adequate justification for indications and contraindications in the care of patients.

• All **scientific research** referred to, reported or used in the CME activity in support or justification of patient care recommendations conforms to the generally accepted standards of experimental design, data collection and analysis.

*The Declaration on the disclosure form will request that the person involved in the CME activity affirm their commitment, via signature, to ensure balance, independence, objectivity, and scientific rigor in UCSD CME activities.*

**Review and Resolution**

Identified conflicts of interest will be reviewed by UCSD CME, Associate Dean for CME, course director, planning committee, CME Advisory committee, and/or UCSD medical departments, as appropriate. Additional information on the CME activity may be collected for review. If a COI cannot be resolved through the mechanisms identified above, **AMA PRA Category 1 Credit™** will not be approved.

**Oversight**

The COI and the types of mechanisms used for resolution will be disclosed to CME activity participants. Activities will be evaluated by participants and peer reviewers to determine if the content was free of bias and met acceptable scientific standards.