**Ensure Content is Valid**

# Accredited providers are responsible for ensuring that their education is fair and balanced and that any clinical content presented supports safe, effective patient care.

1. Clearly describe the level of evidence on which the presentation is based and provide enough information about data (study dates, design, etc.) to enable learners to assess research validity.

2. Ensure that, if there is a range of evidence, that the credible sources cited present a balanced view of the evidence.

3. If clinical recommendations will be made, include balanced information on all available therapeutic options.

4. Address any potential risks or adverse effects that could be caused with any clinical recommendations

# FACULTY DISCLOSURE POLICY (NEW PLEASE REVIEW 2021)

**Collect information:** Collect information from all planners, faculty, and others in control of educational content about all their financial relationships with ineligible companies within the **prior 24 months**. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with **ineligible companies**. **Individuals must disclose regardless of their view of the relevance of the relationship to the education.**

Disclosure information must include:

1. A financial relationship, in any amount, exists between the person in control of content and an ineligible company.

2. The financial relationship existed during the past 24 months.

3. The content of the education is related to the products of an ineligible company with whom the person has a financial relationship.

**HIPAA Compliance**

To comply with the Health Insurance Portability and Accountability Act (HIPAA), we ask that all program planners and instructional personnel insure the privacy of their patients/clients by refraining from using names, photographs, or other patient/client identifiers in course materials without the patient’s/client’s knowledge and written authorization.

I agree that my presentations will be in compliance: \_\_\_\_\_\_\_\_\_\_\_\_\_(INITIAL HERE)

As Course Director/Planner/Course Faculty/Presenter of the course named below, I have read and agree to adhere to the policies stated above:

Printed Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ CME Activity Title and Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**SAINT LOUIS UNIVERSITY CME**

**COI REVIEW & RESOLUTION FORM INSTRUCTIONS**

# Clarifications, Suggestions and Answers

**Q: When do relationships create "conflicts of interest?" (SCS 2.1)**  
A: The ACCME considers financial relationships to create actual conflicts of interest (COI) in CME when individuals have both a financial relationship with a commercial interest **and** the opportunity to affect the content of CME about the products or services of that commercial interest.

**Q: Is failure to return or provide disclosure information on relevant financial relationships the same as a refusal to disclose?**  
A: Yes. Refusal to disclosure is not limited to the explicit act of saying "no" to a provider's request for such information. Unresponsiveness that precludes the provider from implementing a mechanism to identify and mitigate a COI is equivalent to a refusal. – Speaker materials must be received with enough time to identify and mitigate potential conflicts of interest.

**Q: Can a provider choose to implement a mechanism to mitigate conflicts of interest only for relationships they deem to have created "substantial" conflicts of interest?**  
A: No. If there is any relevant financial relationship, there is a conflict of interest. A mechanism to mitigate conflicts of interest must be implemented in all such cases.

**Possible Mitigation Strategies: The SLU CME Office will discuss next steps for anyone that has a conflict. Mitigation strategies must be implemented prior to the person assuming their role in planning or implementing the content of a CME activity.**

**Mitigation steps for planners** (choose at least one) ✓ Divest the financial relationship ✓ Recusal from controlling aspects of planning and content with which there is a financial relationship ✓ Peer review of planning decisions by persons without relevant financial relationships ✓ Use other methods (please describe): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Mitigation steps for faculty and others** (choose at least one) ✓ Divest the financial relationship ✓ Peer review of content by persons without relevant financial relationships ✓ Attest that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines) ✓ Use other methods (please describe):