Flowchart for the Identification and Resolution of Personal Conflicts of Interest

Meeting the Expectations of ACCME’s Criterion 7

(Last updated: February 1, 2017)

Use this flowchart at the beginning of your planning process for CME activities to ensure independence from ACCME-defined commercial interests. Start at A below. For step-by-step instructions for using this flowchart, visit www.accme.org/coiflowchart.

A

Is the content related to products or business lines of an ACCME-defined commercial interest?

Yes

For each person in control of content for the CME activity...

B

Is the person an employee/owner of an ACCME-defined commercial interest? (SCS 1)

Yes

Employees of ACCME-defined commercial interests can have no role in the planning or implementation of CME activities related to their products/services. (SCS 3) Done!

No

Disclosed to Learners

Before the activity, disclose to learners that there are no relevant financial relationships with ACCME-defined commercial interests for anyone who was in control of the content of the activity. (SCS 6.2) Done!

C

Does the person have a relevant financial relationship with an ACCME-defined commercial interest? (SCS 2.1)

Yes

Yes, there is a relevant financial relationship.

Provider takes an active role to resolve conflicts by:

- recusing person from controlling aspects of planning and content with which they have a conflict of interest and/or
- using peer-review of planning decisions (for planners) by person(s) that do not have conflicts of interest related to the content and/or
- using peer-review of content (for authors/presenters) by person(s) that do not have conflicts of interest related to the content and/or
- making sure to ensure that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines) and/or
- using other methods that meet ACCME’s expectations

Implement your process to resolve the potential conflict-of-interest arising from their relevant financial relationship. (SCS 2.3)

Disclosed to Learners

Before the activity, disclose to learners the name(s) of the individual(s), name of the ACCME-defined commercial interest with which they have a relevant financial relationship(s) and the nature of the relationship. (SCS 6.1) Done!

No

Disclosed to Learners

Before the activity, disclose to learners that the person(s) have no relevant financial relationship(s) with ACCME-defined commercial interests to disclose. (SCS 6.2) Done!

D

Is there a relevant financial relationship? If you can check all 4 boxes below, you’ve identified a relevant financial relationship with an ACCME-defined commercial interest that must be resolved before the activity occurs.

- Financial relationship between person in control of content (or their spouse/partner) and an ACCME-defined commercial interest
- Any amount ($)
- In the past 12 months
- Products/services of the ACCME-defined commercial interest (with which they have the financial relationship) are related to the content of the CME activity

Yes

Done!

Footnotes

1. The use of employees of ACCME-defined commercial interests as faculty and planners or in other roles where they are in a position to control the content of accredited CME is prohibited, except in specific situations. For more information, visit this Ask ACCME frequently-asked-question regarding commercial employees.

2. There are a range of approaches providers can use to resolve potential conflicts of interests. For more information, visit ACCME’s Provider Examples of Compliance and Noncompliance for Criterion 7 on www.accme.org.