



Conflict of Interest Resolution/Disclosure Cases

Beth Banner, CHCP
Manager, Office of Continuing Education



Disclosure

- ◆ I have no relevant financial relationships to disclose.



What is a relevant financial relationship?

- ◆ **Relevant financial relationships** are financial relationships in any amount, which occurred in the twelve-month period preceding the time that the individual was asked to assume a role controlling content of the CME activity, and which relate to the content of the educational activity, causing a conflict of interest.

Using ACCME's Flowchart for Identifying and Resolving Personal Conflicts of Interest. ACCME.org. <http://www.accme.org/education-and-support/video/tutorials/using-accme-s-flowchart-identifying-and-resolving-personal>. Accessed July 19, 2017.



Who is in control of content?

- ◆ If someone in connection to the activity has the opportunity to affect the content, they are “in control of content.”
- ◆ Those individuals in a position to control the content of an educational activity might include (but are not limited to) **planners, faculty, authors, committee members, content reviewers, editors, and staff** depending on the accredited provider's processes for developing educational activities.

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What is a commercial interest?

- ◆ A *commercial interest* is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.
- ◆ The ACCME does not consider providers of clinical service directly to patients to be commercial interests - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.

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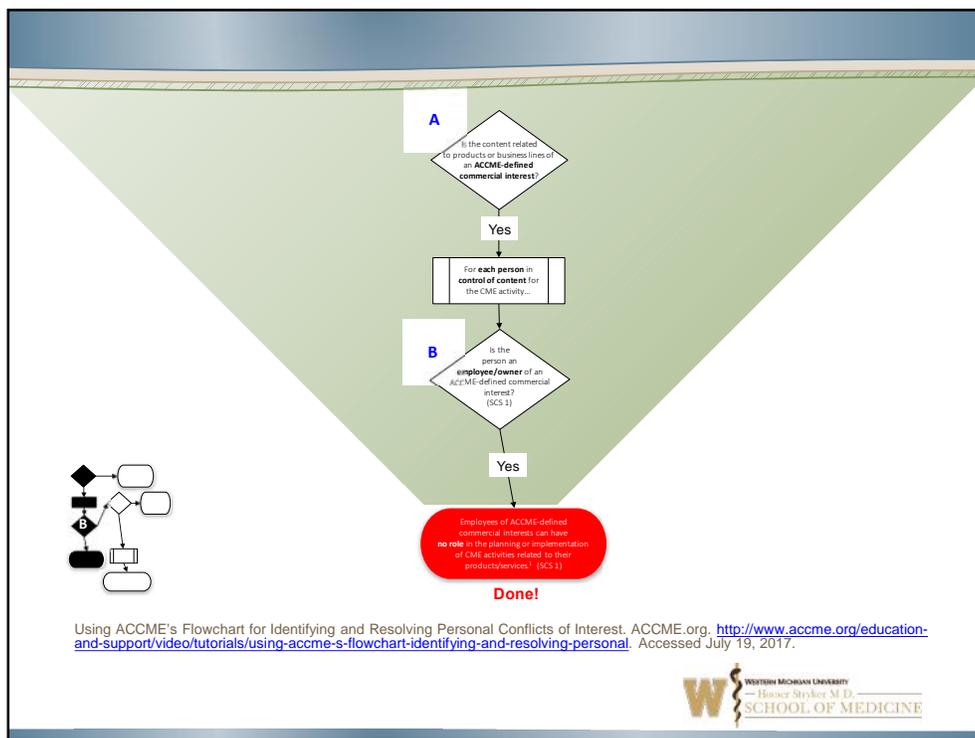
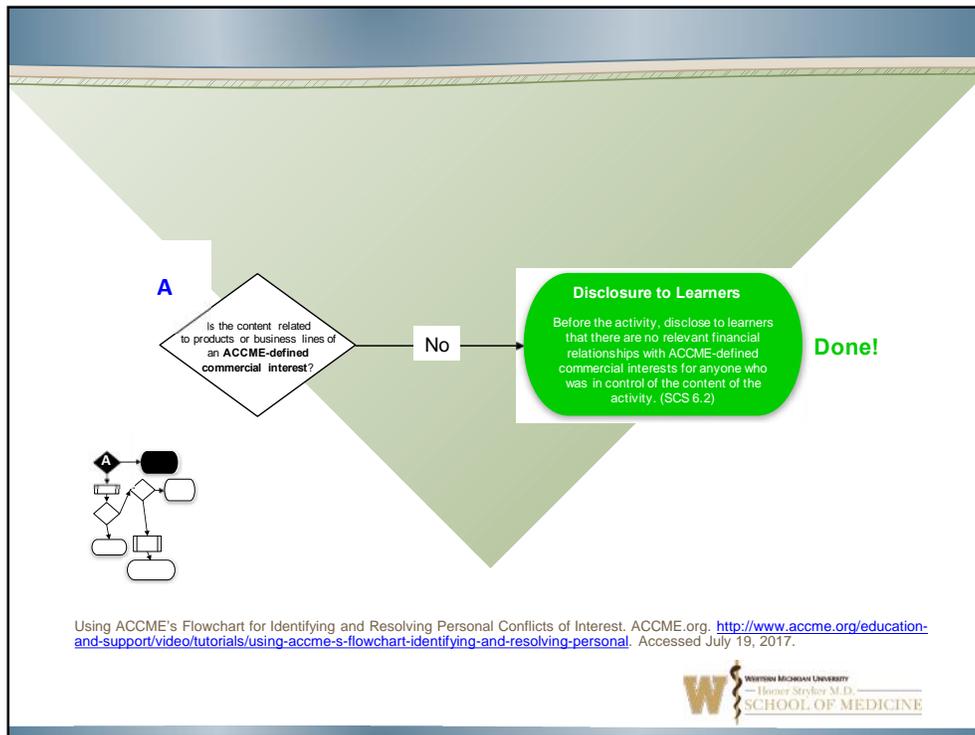
What is *not* a commercial entity?

- ◆ 501-C Non-profit organizations*
- ◆ Government organizations
- ◆ Non-health care related companies
- ◆ Liability insurance providers
- ◆ Health insurance providers
- ◆ Group medical practices
- ◆ For-profit hospitals
- ◆ For profit rehabilitation centers
- ◆ For-profit nursing homes
- ◆ Blood banks
- ◆ Diagnostic laboratories

*Note, ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint provider, but they can be a commercial supporter.

Definition of a Commercial Interest. ACCME.org. <http://www.accme.org/requirements/accreditation-requirements-cme-providers/policies-and-definitions/definition-commercial-interest>. Accessed July 19, 2017.





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)

No

C

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

No

Disclosure 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!

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

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C

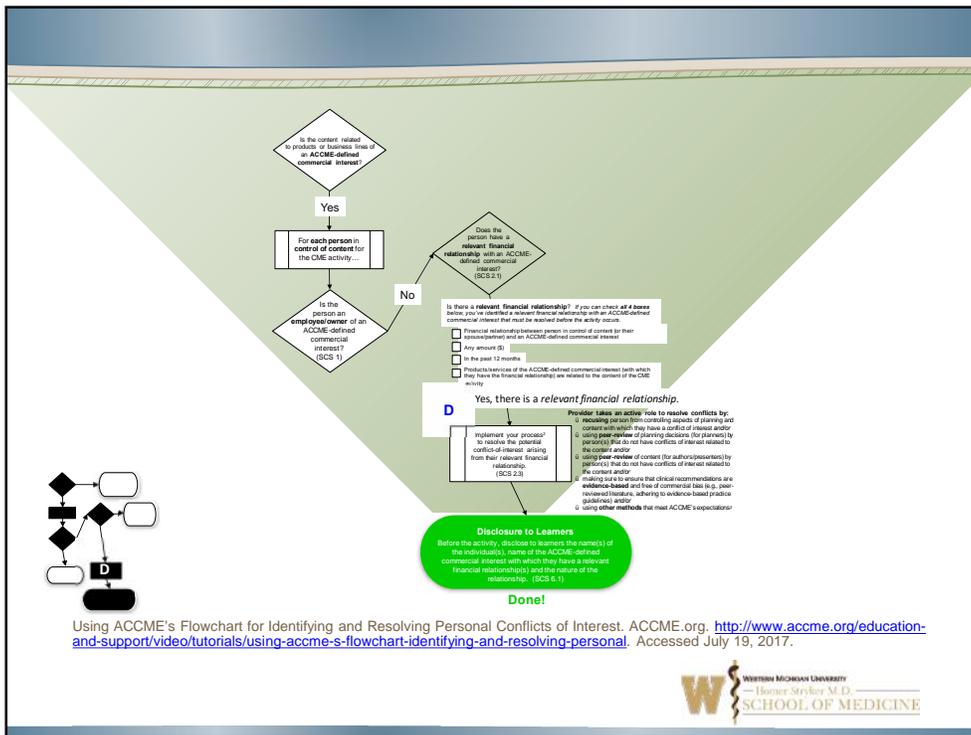
Does the person have a relevant financial relationship with an ACCME-defined commercial interest? (SCS 2.1)

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.

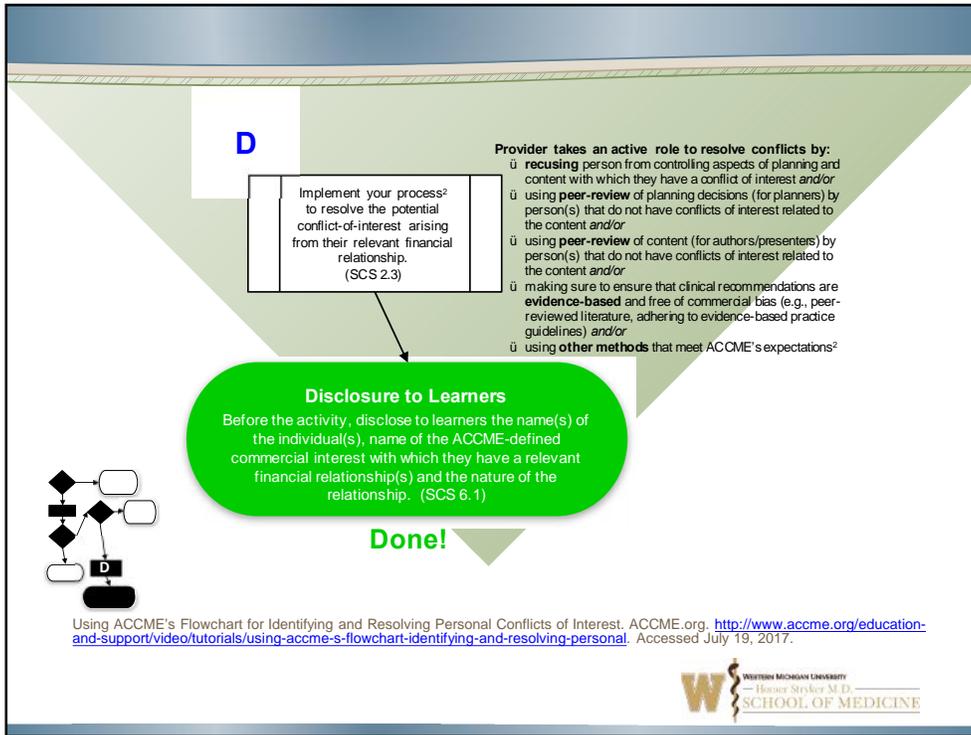
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Case Studies



Case #1

- ◆ Activity:
 - Much Ado About Clotting: A Guide For Your Clinical Practice
- ◆ Disclosure:
 - Stephen Moll; Speaker; Consultant; Boehringer-Ingelheim, Janssen Pharmaceuticals



Case #1

◆ A:

- Are Boehringer-Ingelheim and Janssen ACCME-defined commercial interests?

YES



Case #1

◆ B:

- Is Dr Moll an employee/owner of Boehringer-Ingelheim and/or Janssen?

NO



Case #1

◆ C:

- Is there a financial relationship?
YES
- In any amount?
YES
- In the past 12 months?
YES
- Do Boehringer-Ingelheim or Janssen's products relate to the activity?
???



Case #1

◆ Additional Information:

- Boehringer-Ingelheim makes a variety of products including an anti-clotting combination of dipyridamole and acetylsalicylic acid (trade names Aggrenox®, Asasantin®).
- Rivaroxaban (trade name Xarelto®) is an anti-clotting drug made by Janssen.



Case #1

◆ C:

- Is there a financial relationship?
YES
- In any amount?
YES
- In the past 12 months?
YES
- Do Boehringer-Ingelheim or Janssen's products relate to the activity?
YES

Case #1

◆ Resolution:

- We reviewed Dr Moll's slides prior to the activity. No commercial bias was perceived.
- Dr Moll's financial relationships were disclosed to learners in a slide at the beginning of his presentation.

Case #2

- ◆ Activity:
 - 2017 Sports Medicine Symposium-
Return to Play
- ◆ Disclosure:
 - Bradley Toepper; Planning Committee;
Employee; Bronson Healthcare Group,
Western Michigan University



Case #2

- ◆ A:
 - Are Bronson Healthcare Group and/or
Western Michigan University ACCME-
defined commercial interests?

NO



Case #2

- ◆ Resolution:
 - No conflict of interest
 - A handout indicated listed the speakers with relevant financial disclosures and stated that all others involved in the planning and presentation had no financial relationships to disclose.



Case #3

- ◆ Activity:
 - Coming Together 2016: A Community Conference on Addiction and Recovery
- ◆ Disclosure:
 - Michael Liepman; Planning Committee; Speakers' Bureau; Reckitt Benckiser Ltd. (a.k.a. Indivior; a.k.a. Direct Success) Alkermes Inc.



Case #3

◆ A:

- Are Reckitt Benckiser Ltd and/or Alkermes Inc ACCME-defined commercial interests?

YES



Case #3

◆ B:

- Is Dr Liepman an employee/owner of Reckitt Benckiser Ltd and/or Alkermes Inc?

NO



Case #3

- ◆ C:
 - Is Dr Liepman in control of content?

???

Case #3

- ◆ Additional Information:
 - Although listed on the application as a member of the planning committee, Dr Liepman was in the late stages of cancer and did not participate in the planning of this activity.

Case #3

- ◆ C:
 - Is Dr Liepman in control of content?
NO
 - Is the relationship financial, in any amount?
N/A
 - In the past 12 months?
N/A
 - Do Reckitt Benckiser Ltd and/or Alkermes Inc's products relate to the activity?
N/A



Case #3

- ◆ Resolution:
 - As Dr Liepman was a WMed faculty member, we were aware of his illness and contacted the activity coordinator to confirm that not he was participating in planning the activity.
 - No conflict of interest
 - A handout indicated that no one involved in the planning or presentation of the activity had relevant financial relationships to disclose.



Acknowledgements

My thanks to Courtney Puffer for assisting with case selection



References

1. Flowchart for the Identification and Resolution of Personal Conflicts of Interest. ACCME.org. <http://www.accme.org/news-publications/publications/tools/flowchart-identification-and-resolution-personal-conflicts>. Accessed July 19, 2017.
2. Using ACCME's Flowchart for Identifying and Resolving Personal Conflicts of Interest. ACCME.org. <http://www.accme.org/education-and-support/video/tutorials/using-accme-s-flowchart-identifying-and-resolving-personal>. Accessed July 19, 2017.
3. Definition of a Commercial Interest. ACCME.org. <http://www.accme.org/requirements/accreditation-requirements-cme-providers/policies-and-definitions/definition-commercial-interest>. Accessed July 19, 2017.

