



Office of the Dean
School of Medicine

Policy Title: Policy on Continuing Medical Education Conflicts of Interest

Last Review/Revision/Approval: June 2022

Review Cycle: 4 years

Body Responsible for Review/Revision: Continuing Medical Education Advisory Committee

Responsible Dean: Associate Dean for Academic Affairs

**Relevant LCME Element:
(if applicable)** 1.2

Policy Statement/Purpose:

The primary goal of the LSU Health Sciences School of Medicine Continuing Medical Education (LSU CME) office is to provide high-quality, evidence-based education that meets the needs of the LSU School of Medicine community and its stakeholders. The LSU School of Medicine-New Orleans is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to certify eligible education for *AMA PRA Category 1*™ credit.

This conflict of interest policy aims to maintain the educational integrity of CME activities by managing and mitigating potential conflicts of interest that may arise in the planning and presentation of certified education. Education must be independent of industry influence and the ACCME's *Standards for Integrity and Independence in Accredited Continuing Education Standard 3* provides guidance for managing this process. This policy meets the ACCME's criterion for managing conflicts of interest in continuing medical education and may be modified to maintain accreditation standards.

Policy Directives:

The LSU School of Medicine-New Orleans conflict of interest policy is as follows:

All those in a position to influence educational content must provide an accurate and timely LSU CME disclosure that requests all financial relationships with ineligible companies within the past 24 months. Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products

used by or on patients. There is no minimal financial threshold; you must disclose all financial relationships, regardless of the amount, with ineligible companies. Disclosure includes all financial relationships, whether you view the financial relationship as relevant to the education. The primary mechanism to collect this information is an electronic form.

Once received, this information is reviewed to ensure eligibility to participate in planning, presenting, authoring, or influencing educational content. This may require additional information and require initiation of our mitigation process. Confirmation on a CME activity is not confirmed until this determination is made by the LSU CME office.

CME COI Process Steps

Step 1: Collect Information

In the initial planning stages of the activity-during the initial planning meeting to discuss activity elements-the process and management for collecting disclosures of those in control of the content and LSU CME policies are discussed. In this meeting with activity planners, all activity planners are identified. LSU CME mechanism for identifying financial relationships with ineligible companies is by using an electronic disclosure form. Each person determined to be in control of content is required to complete a disclosure form in a timely manner. The CME office will review the information once it is collected.

Step 2: Exclude Owners and Employees of Ineligible Companies

Individuals who are owners or employees of ineligible companies are not eligible to participate in accredited education. Three very narrow exceptions exist for their participation. Please contact the LSU CME office to discuss.

Step 3: Identify Relevant Financial Relationships

Completed disclosure forms will be reviewed to determine which financial relationships are relevant to education. Financial relationships are relevant if the educational content and individual can control is related to the business lines or products of the ineligible company. Only the CME office or their designee can make the relevance determination decision.

Step 4: Mitigate Relevant Financial Relationships

The CME office will take steps to prevent all those with financial relationships from inserting commercial bias into content. This process differs depending on the role the individual has in the activity, the content presented, the learning format and the timing of the activity.

- **Planner with Relevant Financial Relationship(s)**

Planners with relevant financial relationships will have all planning decisions reviewed by non-conflicted planners who are deemed eligible and qualified to make content decisions. This process aims to have a non-biased, unconflicted, content expert review the planning decisions (i.e. speaker selection, agenda, evaluation and commercial support). The additional planner is expected to fully participate as a planner for the duration of the activity to ensure

no influence from financial relationships exists. The additional planner will review all faculty decisions and all content.

- **Speaker with Relevant Financial Relationship(s)**

Speakers with relevant financial relationships will be asked to provide a copy of their presentation at least business 5 days prior to the date of the activity. The presentation will be reviewed by the CME staff and CME staff will send the completed disclosure, copy of the presentation and initial findings to the activity medical director (AMD). This process aims to have the AMD, a non-biased, unconflicted, content expert review the presentation materials

The AMD will review and reply with their findings. A final decision and/or any recommendations to edit content, is communicated to the presenter. The presenter is given the option to present with the changes or, in some instances, present without the ability to offer CME credit. Typically, this process is performed by email and requires additional time and timely responses from all parties involved.

Step 5: Disclose All Relevant Financial Relationships to Learners Prior to the Start of the Activity

Learners are informed of the presence or absence of relevant financial relationships for all individuals in control of content prior to the beginning of the activity. The CME office provides each activity with disclosure slides or a handout with disclosure information. The method of communicating this information is discussed in the planning meeting and, as a general rule, we attempt to have this information communicated to learners two different ways prior to the activity. Slides are updated as needed on the SharePoint site for most activities.

For activities where there is a moderator or introductory remarks, disclosure slides are presented at the beginning of the conference. For activities with handouts, the information is available on the handout distributed at registration.

In general, LSU CME intends to communicate this information using two methods for each activity. This is often dependent upon activity format and delivery and discussed in the planning meeting.

Key Definitions

Definition of Conflict of Interest: A potential conflict of interest arises when an individual has the opportunity to influence CME content about products or services of an ineligible company with which they have a financial relationship with in the past 24 months.

Disclosure Requirements: All CME faculty, planners, and authors or those deemed to have influence are required to disclose any financial relationships that could be perceived as a conflict of interest. This disclosure is necessary to ensure that the educational content is free from commercial bias.

Mitigation Process: The policy mandates that any disclosed conflicts of interest must be reviewed and resolved before the CME activity is approved. This is to ensure that the content remains objective and unbiased.

Documentation: Individuals involved in CME activities must complete a disclosure form, which is reviewed as part of the planning process. This documentation is necessary for maintaining the integrity of the CME program.