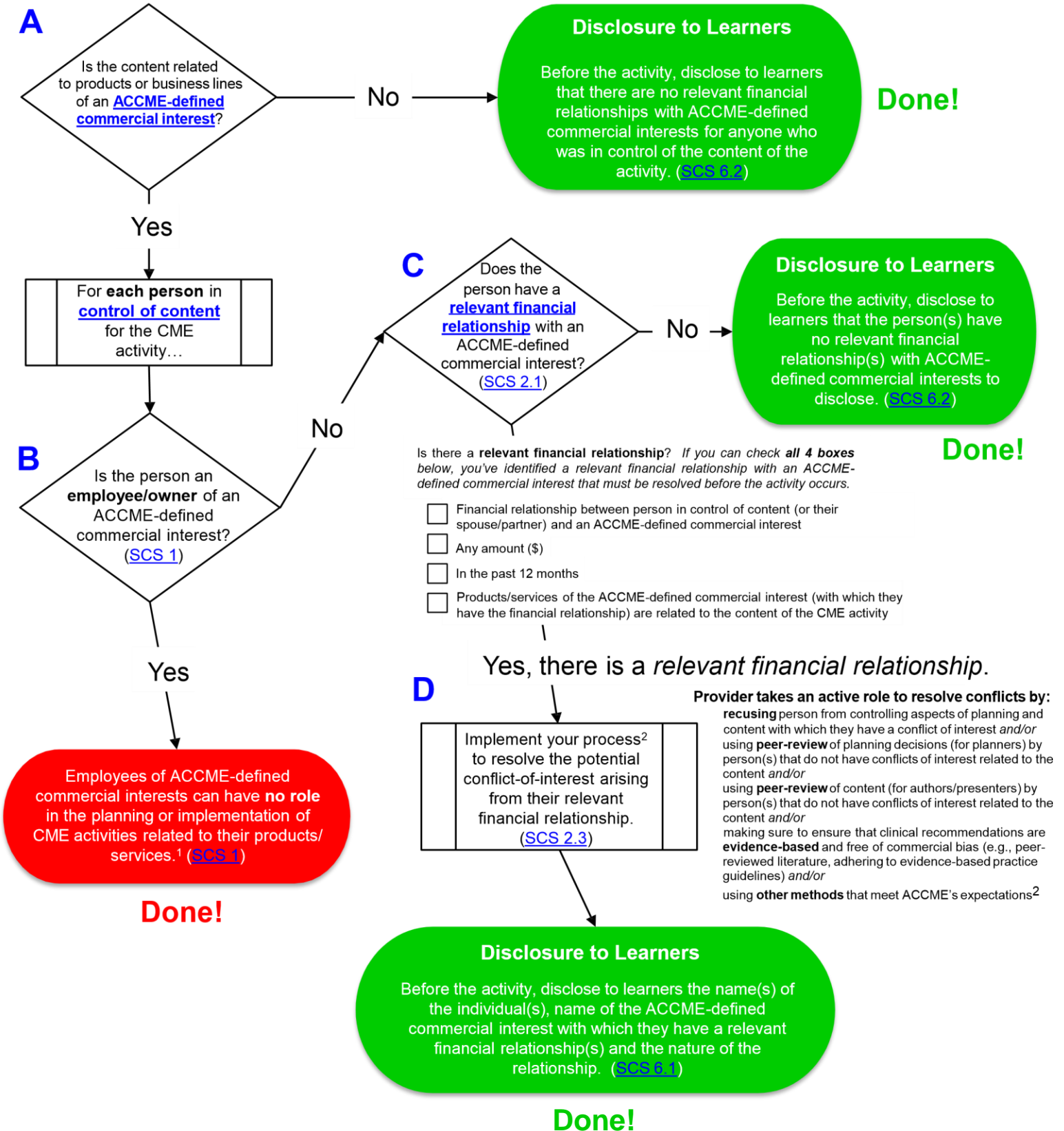




# Flowchart for the Identification and Resolution of Personal Conflicts of Interest Meeting the Expectations of ACCME's Criterion 7

(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](http://www.accme.org/coiflowchart).



## ACCME DEFINITIONS

**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.

**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 (see “Conflict of Interest” definition below). The ACCME considers financial relationships to create conflicts of interest 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.

**Conflict of Interest:** The ACCME considers financial relationships to create conflicts of interest 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. The ACCME considers content of CME about the products or services of that commercial interest to include content about specific agents/devices, but not necessarily about the class of agents/devices, and not necessarily content about the whole disease class in which those agents/devices are used.

## ACCME F.A.Q:

**Are there any circumstances when employees/owners of ACCME-defined commercial interests can be in a position to control the content of accredited CME?**

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 the specific situations specified here. **The ACCME has identified 3 special-use cases where employees of ACCME-defined commercial interests can have a specific, limited role in accredited CME activities.** In each scenario—as in every accredited CME activity—the expectations of ACCME’s Accreditation Requirements, including the Standards for Commercial Support, must be met:

1. Employees of ACCME-defined commercial interests can control the content of accredited CME activities when the content of the CME activity is not related to the business lines or products of their employer. *Note: The definition of “related” for employees and owners differs from the definition used for COI resolution. For the former, they said it cannot be related in any way – therefore, if a product or service deals with heart rhythm care, an employee or owner would not be allowed. For regular COI, a presenter could cover pacemakers, but not a specific type of pacemaker that would be made by a commercial interest with which there is a relationship.*
2. Employees of ACCME-defined commercial interests can control the content of accredited CME activities (e.g., as planners, authors, or speakers [including poster presentations]) when the content of the accredited CME activity is limited to basic science research (e.g., pre-clinical research, drug discovery) or the processes/methodologies of research, themselves unrelated to a specific disease or compound/drug. In these circumstances, the accredited provider must be able to demonstrate that it has implemented processes to ensure employees of ACCME-defined commercial interests have no control of CME activity content that is related to clinical applications of the research/discovery or clinical recommendations concerning the business lines or products of their employer.
3. Employees of ACCME-defined commercial interests can participate as technicians in accredited CME activities that teach the safe and proper use of medical devices. In this circumstance, the accredited provider must demonstrate that it implements processes to ensure that employees of ACCME-defined commercial interests have no control of CME activity content that is related to clinical recommendations concerning the business lines or products of their employer.

## What are the resolution options for Presenters/Session Chairs?

- **Resolution 1:** Replace the presenter/session chairs.
- **Resolution 2:** Assign different content to presenter/session chair to avoid conflict of interest.
- **Resolution 3:** Limit the presentation/session to report without recommendations.
- **Resolution 4:** Utilize peer review of content prior to the program (*default resolution for enduring products and Board Review because slides are always available in advance of the activity*).
- **Resolution 5:** Limit sources of recommendations to scientifically peer-reviewed, evidence-based, and unbiased literature and guidelines.  
(*default resolution for presenters for Scientific Sessions and other live activities; other resolutions to be considered if Resolution 5 is not practical for a specific case*).

For more information, visit [this Ask ACCME frequently-asked-question](#) regarding commercial employees.

\*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](http://www.accme.org).

\*\*\*The **ACCME** defines a **commercial interest** as “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**.”