CONFLICT OF INTEREST (COI) MANAGEMENT AND RESOLUTION

Individual cannot participate in planning and/or teaching the educational activity

Disclosure sent to all individuals in a position to influence or control content of educational activity

Is individual willing to complete disclosure?

Yes

Document decision and discussion between OCPD and Planning Committee. No financial disclosure forms need to be completed.

No

Disclosure information is reviewed by OCPD and designated planning committee reviewer

Does individual disclose financial relationships?

Yes

Update COI grid per COI Grid Guidelines

Individual can participate in educational activity planning

No

Is the relationship a relevant financial relationship with an ACCME-defined commercial interest and therefore presents a potential COI?

Yes

If all 4 boxes are checked, it's a relevant financial relationship

- 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 prior to the activity
- Products/services of the ACCME-defined commercial interest with which the person has the financial relationships are related to the content of the CME activity

Are all 4 boxes checked?

Yes

Before activity, disclose to learners there are no relevant financial relationships with ACCME-defined commercial interests for anyone who was in control of the activity's content.

No

Actions to manage and resolve COI
- Review presentation content (peer or independent review)
- Contact speaker regarding presentation content
- Refer to Course Director or Planning Committee member for additional review
- Other actions as needed

Determine appropriate action to manage and resolve COI

Can COI be managed or resolved?

Yes

Update COI grid with COI management or resolution plan and notes, per COI Grid Guidelines

Individual can participate in planning CME activity per COI management and resolution plan

No

Individual cannot participate in planning/teaching educational activity

Owners/Employees of an ACCME-defined commercial interest cannot participate in planning/teaching an accredited activity.

See ACCME Resource: Flowchart for the Identification and Resolution of Personal Conflicts of Interest

Updated 7/2019
Conflict of Interest review must be documented

No financial relationship(s) disclosed
Update “Is there a potential COI” column on COI grid to “no”, include your initials and the date

Non-relevant financial relationship(s) disclosed
Update “Is there a potential COI” column on COI grid to “no”, include your initials and the date

Relevant financial relationship(s) disclosed
• Update “Is there a potential COI” column on COI grid to “yes”, include your initials and the date
• Determine which of the following COI management/resolution action plan will effectively manage or resolve this COI
  o Review presentation content (peer or independent review)
  o Contact speaker regarding presentation content
  o Refer to Course Director or Planning Committee member for additional review
  o Other actions as needed (include detailed notes on COI grid)
• Update “COI management/resolution plan” column to reflect which action plan was taken
• Update “Notes” column on COI grid with additional information

Learners must be informed of disclosure information prior to the start of the activity

For activities with content related to products/business lines of an ACCME-defined commercial interest
Include disclosure information in onsite materials distributed to learners and/or include a disclosure slide that is displayed prior to the start of the educational content; see available slide template. Communication with faculty should stress the importance of providing complete and accurate financial disclosure information. In the event that a speaker makes an update to her/his disclosure information, make note of this information on the COI grid.

For activities with content that is NOT related to products/business lines of an ACCME-defined commercial interest as determined by OCPD and Planning Committee, no Financial Disclosure forms are collected
Include disclosure information in onsite materials distributed to learners and/or include a disclosure slide that is displayed prior to the start of the educational content. Language should reflect, “There are no relevant financial relationships to report on behalf of the planning committee or presenters. This activity provides a focus on __________ and does not discuss healthcare goods/services.”