



# ASSOCIATION OF PHYSICIANS OF PAKISTANI-DESCENT OF NORTH AMERICA

## **APPNA CME Conflict of Interest (COI) Policy and Procedure**

(Approved September 18, 2017)

Association of Physicians of Pakistani-descent of North America (APPNA) Office of Continuing Medical Education requires that all CME certified activities be developed free from the control of a commercial interest<sup>1</sup> and be balanced, objective, and scientifically rigorous.

### ***Definition of Conflict of Interest (COI)***

A conflict of interest exists when individuals in a position to control the content of a CME activity have a relevant personal financial relationship with a commercial interest that benefits the individual and may ultimately bias the content being presented. The following factors serve as part of the foundation for potential COI:

- A financial relationship (in any amount) with a commercial interest occurring within the past 12 months and
- The opportunity to affect the content of CME about the products or services of that commercial interest.

When the individual's interests are aligned with those of a commercial interest, the interests of the provider are in 'conflict' with the interests of the public. The interests of the people controlling CME must always be aligned with what is in the best interests of the public

### ***The Role of APPNA CME***

APPNA CME, as the designated Accreditation Council for Continuing Medical Education (ACCME) entity for APPNA, is responsible for creating a mechanism to identify, manage and resolve all conflicts of interests for all individuals involved in the planning and implementation of an ACCME certified activity.

APPNA CME incorporates the following strategies as part of the overall planning process of CME activities:

- Identify financial relationship that may constitute a potential conflict of interest for all individuals involved in the planning and implementation of the proposed CME activity (planning committee members, faculty presenters, authors, etc.).
- Disqualify any individual who fails to provide disclosure from participation in the planning and/or implementation of the proposed CME activity.
- Implement educational planning and design strategies that work to ensure that content is balanced, scientifically rigorous, and evidenced-based and reflects the current standards of care and/or future directions of medicine and healthcare.
- Monitor and manage CME activities in accordance with the current standards, regulations and guidelines outlined by the constituencies involved in the delivery of continuing medical education, research and patient care.
- Document the processes for needs assessment, gap analysis, content validation, and educational design that provide for fair and balanced discussion of the desired topics.
- Monitor the execution of CME activities to validate the presence/absence of commercial bias and the consistent application of the standards of quality education for physicians and other healthcare professionals.

### ***Procedures for Identifying, Managing, and Resolving Conflicts of Interest***

All individuals in a position to control the content of a CME activity (planning committee members, speakers, authors, etc) are required to complete the APPNACME disclosure and attestation form in which they disclose their financial relationships as well as attest that any and all clinical recommendations made for patient care will be based on the best available

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<sup>1</sup> 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.



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evidence, that a balanced view of therapeutic options will be given, and that the content will be developed in accordance with the ACCME Content Validation Statement.

APPNA CME implements primary and secondary COI resolution methods for all CME-certified activities; the primary resolution method is implemented for all individuals in a position to control the content of a CME activity. The secondary resolution methods are implemented for all individuals who have identified financial relationships with commercial interests through the primary resolution method.

### Primary COI Resolution Method for All Activity Types:

Completion of the APPNA CME disclosure and attestation form as described above. In addition, learners will have the opportunity to identify any perceived commercial bias through the course evaluation.

### Secondary COI Resolution Method Options by Activity Type:

Directly Sponsored, Live Courses (including regularly scheduled series<sup>2</sup>):

- Course Director(s) prospectively review the content and complete a “Resolution of Conflict of Interest” form stating the action taken to resolve the COI; completed forms must be returned to APPNA CME, or
- The speaker(s) prospectively provide slides to APPNA CME for review prior to presenting; content is revised as needed according to the results of the review.

Directly Sponsored, Enduring Materials (i.e., print, Internet-based):

- All content will be prospectively reviewed and approved by APPNA CME prior to the release of the activity; content will be revised as needed according to the results of the review.

Jointly/Co-sponsored Activities (APPNA Certifies with outside entity):

- All content will be prospectively reviewed and approved by APPNA CME and the APPNA faculty member prior to the release of the activity; content will be revised as needed according to the results of the review.

Note: if the activity involves a moderator who has identified conflicts of interest and has no identifiable content to be reviewed, then the resolution method for that moderator consists of completion of the APPNA CME disclosure and attestation form.

In addition, the following prospective action may be taken to resolve potential COI depending on the financial relationships identified by the individuals:

Reported COI	Prescribed Prospective Action for Resolution
<i>Level 1:</i> No financial relationships	No action required; faculty letter instructs presenter on rules for developing CME content.
<i>Level 2:</i> Individual has financial relationships with one or more commercial interests.	<ul style="list-style-type: none"> <li>• APPNA CME reviews content and makes edits as needed, OR</li> <li>• CME Activity Chair / RESA Committee Chair reviews content and completes COI resolution form stating</li> </ul>

<sup>2</sup> Because presentations given as part of regularly scheduled series primarily consist of case discussions, presentation of clinical research findings, morbidity and mortality discussions, tumor boards, etc. the secondary resolution method will be utilized at the CME office’s discretion.



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	action(s) taken
<p><i>Level 3:</i> Individual has financial relationships with one or more commercial interests, including relationships with commercial supporter(s) of CME activity.</p>	<ul style="list-style-type: none"> <li>• APPNA CME reviews content and makes edits as needed, OR</li> <li>• CME Activity Chair / RESA Committee Chair reviews content and completes COI resolution form stating action taken</li> <li>• APPNA CME may identify an independent content reviewer to conduct a secondary review, if necessary</li> </ul>
<p><i>Level 4:</i> Individual is an employee/owner of an ACCME-defined commercial interest</p>	<ul style="list-style-type: none"> <li>• APPNA strictly prohibits employees/owners of ACCME-defined commercial interests from having a role in the planning or implementation of a CME activity.</li> <li>• Employees/owners of ACCME-defined commercial interests are disqualified from participation in CME activity.</li> </ul>

For an overview and process flow for identifying and resolving of personal conflicts of interest, use flowchart on page 4.

### ***Timing of the Identification, Management, and Resolution of Conflicts of Interest***

CME Activity Chair(s) and RESA Committee Chair:

- Upon submission, review and approval of CME Application; review of disclosure and attestation will commence. Any individual violating APPNA CME’s policy on COI may be disqualified.
- Financial relationship(s) is reviewed by CME staff:
  - No COI identified: no action will be taken and planning process can continue.
  - COI is identified: CME staff will determine how topics and faculty were determined and obtain evidence that the topics represent a balanced, Evidence Based Medicine (EBM) approach.

Faculty/Speaker/Author:

- Completion of the APPNA CME disclosure and attestation no less than **30 days prior** to the date of the presentation.
- Financial relationship(s) is reviewed by CME staff:
  - No COI is identified: no action will be taken and the individual can proceed with developing content.
  - COI is identified: CME staff will determine the appropriate secondary resolution method as described above.

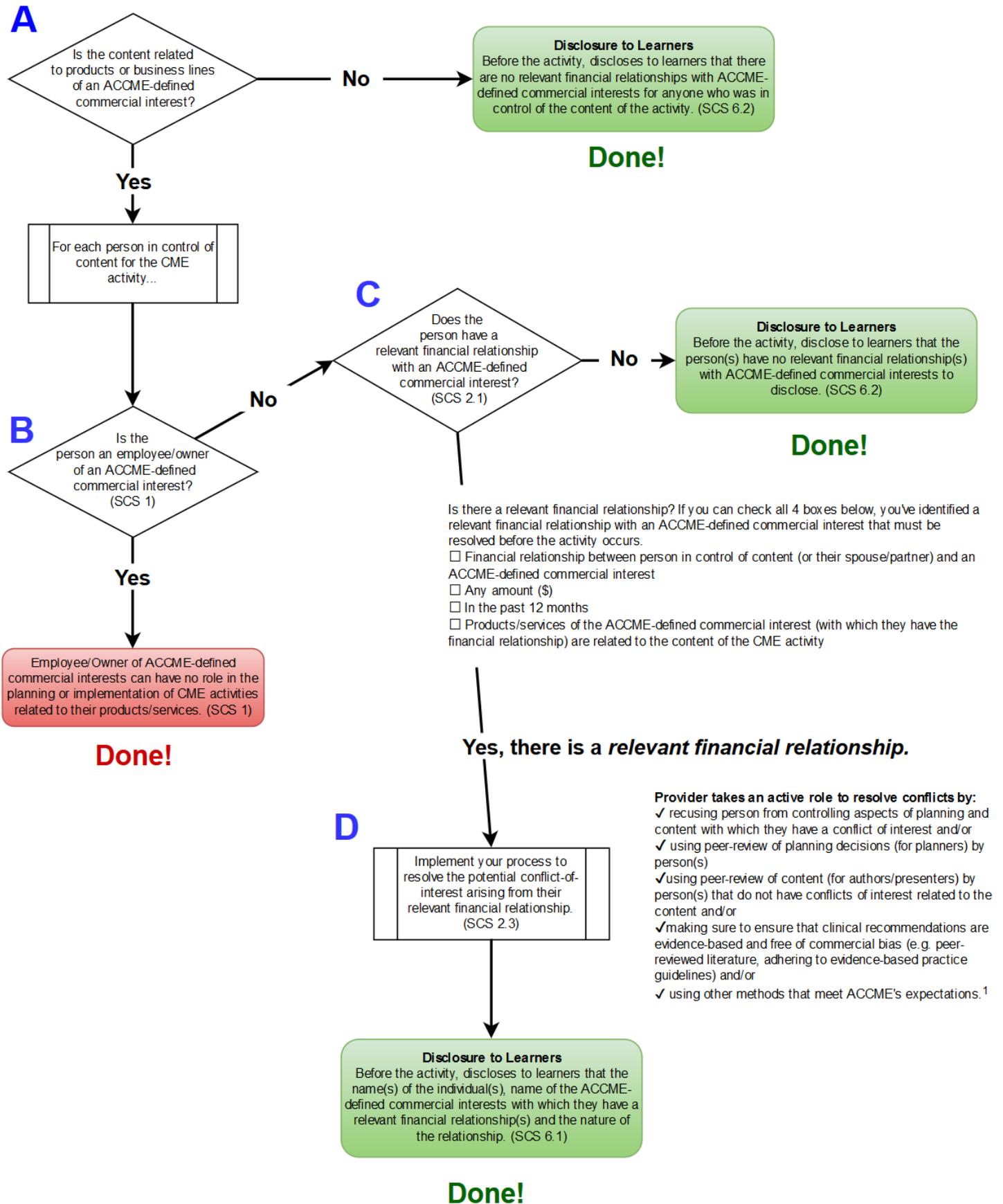
### ***Situations where Conflict of Interest cannot be effectively resolved***

While APPNA CME strives to be flexible, accessible and helpful in the development and implementation of CME certified activities, there are some situations where adequate resolution of COI may not be feasible. In these situations, CME certification will not be provided. Examples of these situations include:

- Requests for CME certification of the content after the majority of the planning for the CME activity has occurred with faculty and/or content selections already determined;
- Short planning timeframes that don’t permit adequate planning and implementation of required ACCME and APPNA CME policies and procedures;
- Inappropriate processes in educational planning and/or financial management that are not consistent with ACCME and/or APPNA CME policies and processes.

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

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.**



### Footnotes

There are a range of approaches providers can use to resolve potential conflicts of interest. For more information, visit ACCME's Provider Examples of Compliance and Noncompliance for Criterion 7 on [www.accme.org](http://www.accme.org)