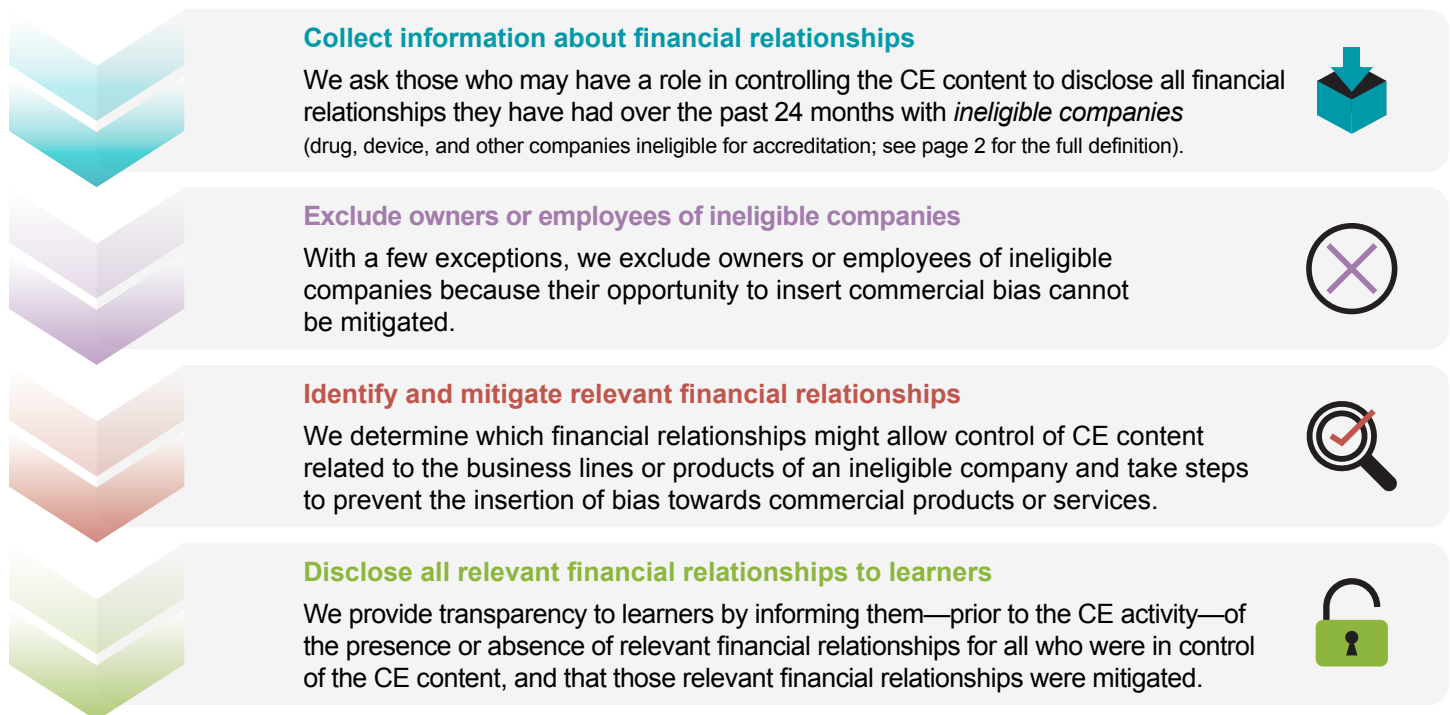


## What Is The Process To Ensure Independence From Commercial Influence In Accredited Continuing Education?

As the stewards of the learning environment for healthcare professionals, accredited continuing education (CE) plays a critical role in navigating the complex interface between industry and the health professions. Through our accreditation, we ensure professionals have access to learning and skill development activities that are trustworthy and are based on best practices and high-quality evidence. These activities must serve the needs of patients and not the interests of industry. This document provides an overview of the process we use to protect the integrity and independence of accredited CE activities.



### There are educational situations that allow you to skip these steps...

**Accredited CE providers do not need to identify, mitigate, or disclose relevant financial relationships for education that meets one or more of these exceptions.**

Will the accredited education be non-clinical, such as leadership or communication skills training?

Will a learner group be solely in control of content of the accredited education, such as a spontaneous case conversation among peers?

Will this be self-directed education where the learner controls their educational goals and reports on changes that resulted, such as learning from teaching, remediation, or a personal development plan?

**Explore these opportunities with your CE staff.**

# How Do I Participate In The Planning and Presentation of Accredited Continuing Education?

Help us to build trust with the health professional learners that depend on our accredited continuing education and expect it to be free from commercial influence. The content below outlines the information we need you to share with us.

## Who needs to disclose?

If you play any of these roles in accredited continuing education, you need to disclose financial relationships.

### Planners



Examples: Planning committees, CE staff, editors, activity directors

### Faculty/Teachers



Examples: Speakers, panelists, instructors, trainers, coaches, educational consultants

### Authors



Examples: Writers, editors, instructional designers, content developers, educational researchers, CE staff

### Reviewers



Examples: Peer reviewers, editors, CE staff

## What needs to be disclosed?

You must disclose all your financial relationships over the past 24 months with ineligible companies on this list.

Disclose relationships whether or not they have already ended during the past 24 months.

### Advertising, marketing, or communication firms

whose clients are ineligible companies

### Bio-medical startups

that have begun a governmental regulatory approval process

### Compounding pharmacies

that manufacture proprietary compounds

### Device manufacturers or distributors

### Diagnostic labs

that sell proprietary products

### Growers, distributors, manufacturers or sellers of medical foods and dietary supplements

### Manufacturers of health-related wearable products

### Pharmaceutical companies or distributors

### Pharmacy benefit managers

### Reagent manufacturers or sellers

*These are companies whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.*

*They are **ineligible** to be accredited in the ACCME System.*

There is no minimal threshold or amount and the financial relationships you disclose should include any of these roles.

### Owner

(e.g., sole proprietor, stockholder in privately-held company)

### Employee

### Executive role

### Researcher

### Consultant, Advisor, Speaker

### Independent contractor

(including contracted research)

### Royalties or patent beneficiary

### Individual publicly traded stocks and stock options

*Diversified mutual funds do not need to be disclosed.*

*Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.*

# How Do We Identify and Mitigate Relevant Financial Relationships?

An important part of our process to protect the integrity of accredited continuing education (CE) is determining when those who can control the content of CE have financial relationships that would allow them to insert commercial bias or influence into the education. We take steps to prevent all those with relevant financial relationships from inserting commercial bias into content. This is mitigation.

## Consider everyone who can control content

**Review financial relationship disclosures before those who can control content of accredited continuing education (CE) assume their roles.**

### Planners



Examples: Planning committees, CE staff, editors, activity directors

### Faculty/Teachers



Examples: Speakers, panelists, instructors, trainers, coaches, educational consultants

### Authors



Examples: Writers, editors, instructional designers, content developers, educational researchers, CE staff

### Reviewers



Examples: Peer reviewers, editors, CE staff

## Exclude owners and employees

**First, we must exclude owners and employees of ineligible companies from controlling content or participating as planners or faculty in accredited CE.**

### Owners



### Employees



*Owners and employees of ineligible companies have a legal duty to act in their company's best interests. They are considered to have unresolvable financial relationships and must not be allowed to influence or control planning, delivery, or evaluation of accredited CE.*

**There are three exceptions when owners and employees of ineligible companies can participate as planners or faculty in accredited CE.**



Content of the CE is not related to the business lines or products of their employer/company.



Content of the CE is limited to basic science research (e.g., pre-clinical research and drug discovery), methodologies of research, and no care recommendations are given.



Participating as technicians to teach the safe and proper use of medical devices, do not recommend whether or when a device is used.

## Is the financial relationship related to the content?

**Determine if the educational content the person can control is related to the business lines or products of the ineligible company with whom they have a financial relationship.**

Would the person's role in the CE activity allow them to insert commercial bias into the content?

Is the content of the CE activity that the person can control related to the products or business lines of the ineligible company?

## Mitigate relevant financial relationships

**Before the person assumes their role in the CE activity, take steps to mitigate by preventing all those with relevant financial relationships from inserting commercial bias into content.**

### Planners, reviewers



*Making decisions related to the scope and direction of the content, educational goals, identification of practice gaps and needs, selecting speakers, authors, reviewers*

### Faculty/teachers, authors



*Teaching, writing, producing and delivering education*

### End the financial relationship

(including having ended the relationship within 24 months).

**Recuse individual from controlling aspects of planning and content with which there is a financial relationship.**

**Peer review planning decisions and review determinations by persons without relevant financial relationships.**

### End the financial relationship

(including having ended the relationship within 24 months).

**Recuse individual from controlling aspects of planning and content with which there is a financial relationship.**

**Peer review of content by persons without relevant financial relationships.**

**Attest that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines).**

## Disclose to learners

**Before learners engage in the accredited CE, disclose all relevant financial relationships to learners.**

Disclosure to learners includes:

**The names of the individuals with relevant financial relationships.**

**The names of the ineligible companies with which they have relationships.**

**The nature of the relationships.**

**A statement that all relevant financial relationships have been mitigated.**

**The absence of relevant financial relationships (if applicable).**

This resource for accredited continuing education providers is the product of the Working Group, *Applying Standards for Integrity & Independence in Academic CPD: Successful Frontline Management*, from the ACCME 2021 Meeting.

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