

Purpose

In accordance with the ACCME's Standards for Commercial Support of Continuing Medical Education, the Policy on Identification and Resolution of Conflicts of Interest (COI) exists to provide guidance for course directors, staff, instructors, planners and managers of CME activities provided by The NYU School of Medicine (NYU SOM). This policy addresses the underlying philosophy of disclosure to learners, mechanisms to collect disclosure information and the parties from whom COI information shall be collected, the mechanisms to resolve COI, and requirements to make disclosure to learners.

Policy

- **Identifying Conflicts of Interest.** A Conflict of Interest Disclosure Form shall be provided to individuals involved with a CME activity who have the following roles:
 - Planner/Course Director
 - Manager of the content/development of the CME activity (not logistics)
 - Presenter/Faculty Member/Author
 - Independent Reviewer
- COI disclosure forms for the Planners, Managers of content/development, Independent Reviewers, and Course Director(s) are collected at the time of application for the CME activity. Approval of an application will not occur without receipt of forms for these individuals.
- Faculty/Instructors/Authors will be assigned the Financial Disclosure form and Activity Disclosure form at the time they are assigned as speakers. They must complete and submit the form prior to their participation in the CME activity as a condition for participation. Refusal to submit a disclosure form will result in disqualification in planning of or participation in the activity.
- NYU SOM will use these forms to determine relevant financial relationships, which shall be disclosed to the CME activity audience, and conflicts of interest, which shall be resolved before the individual may participate in the development of or presentation in the CME activity.
- **Thresholds for COI.** A conflict of interest exists when
 - (a) individuals have a financial relationship, in any amount, with a commercial interest within the past 12 months and
 - (b) the individual has the opportunity to affect the content of CME about the product or services of that commercial interest.
- **Identification of COI.** The Conflict of Interest Disclosure Forms require respondents to:
 - Determine whether they or their spouse/partner have a financial relationship.
 - If they do have a relationship, indicate with which commercial interests they have a relationship and associate those commercial interests with the type of relationship, using the chart on the form.
 - Indicate whether any content they control discusses the products or services of the commercial interests with which they have relationships.
 - Identify the commercial interests whose products or services will be discussed in content over which they have control.

- **Resolution of COI.** The NYU SOM CME office has the primary responsibility for processing COI disclosure forms and resolving evident COI as reported.
 - The Administrative Director will generate a Disclosure Summary and maintain a Resolution of Conflict of Interest spreadsheet with all of the course planners, directors, managers, reviewers, and faculty members listed. The spreadsheet will identify any conflicts of interest and the action taken to resolve those conflicts.
 - The primary option for resolution of COI is substitution of a person with no COI. However, where the faculty member selected is uniquely qualified and not easily replaced as a planner or presenter, the Administrative Director will send a letter to the individual that states:

We thank you for submitting your completed Conflict of Interest (COI) form in a timely manner. We note that you have disclosed relevant financial relationships with commercial interests. In compliance with Accreditation Council for Continuing Medical Education (ACCME) regulations, we must resolve your COI's prior to your participation in this activity. NYU's policy on COI resolution is to hold planners and faculty members to certain standards regarding the content that they control. Therefore, we ask that you:

 - Employ and reference the “best available evidence” in the content you develop and present, and
 - Cite at least 1 high quality reference when discussing or recommending any health care goods or services consumed by, or used on, patients.

In addition, your presentation will be reviewed by an independent reviewer for fair balance, scientific rigor, freedom from commercial bias and adherence to the above standards.
- All presentations by individuals who have indentified a conflict of interest will be reviewed by an independent, or peer reviewer.
- **Documenting Resolution of COI.** Completed COI Disclosure Forms will be maintained in the activity file, as well as a copy of the Resolution of Conflict of Interest spreadsheet and letter to all individuals for whom we have identified a conflict of interest.
 - **Monitoring for Conflict.** A mechanism will be provided for participants to evaluate commercial bias. The SOM office will analyze data for each planner/presenter/author, and will use that data in making decisions about including individual planners/presenters/authors in future CME activities.
 - **For Regularly Scheduled Series (RSS).** The RSS Course Coordinators review the submitted COI disclosure forms with the RSS Course Director. Should the respondent identify any potential conflict of interest, the RSS Course Coordinator shall bring this to the attention of the SOM RSS Project Manager and Sr. Accreditation Coordinator or the independent reviewer who is conducting a peer review to resolve any conflicts.
 - The RSS Coordinator submits with the session packet a copy of the content validation form.