

Joint Accreditation Conflict of Interest Policy Continuing Interprofessional Development (CIPD) Maine Medical Center

Maine Medical Center will adhere to all of the Joint Accreditation Standards for Commercial Support, to ensure that CIPD activities are independent of commercial bias. All planning decisions for a CIPD activity will be made free of commercial interest ((a) identification of needs; (b) the determination of educational objectives; (c) the selection and presentation of content; (d) the selection of all persons and organizations in a position to control the content; (e) the selection of educational methods, and (f) the evaluation of the activity.).

Commercial interest, as defined by the ACCME, is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on patients.

All faculty and non-faculty involved in control of content of an activity must disclose a conflict of interest, and a relevant financial relationship with a commercial interest, before participating in any of the planning decisions noted above. The educational planners must resolve that conflict prior to the planning decisions and activity. MMC will follow the ACCME flowchart for the identification and resolution of personal conflicts of interest

<http://www.accme.org/tutorials/COI-flowchart>. A relevant financial relationship is defined by meeting all 4 criteria: a financial relationship between the person in control of content and the commercial interest; and any \$ amount; and in the past 12 months; and products/services of the commercial interest are related to the content of the CIPD activity.

If the educational planners are unable to resolve a conflict of interest, they may request the conflict of interest be resolved by a senior institutional official (i.e., a Director level or higher individual involved with health professions education).

If an individual in control of content of an activity refuses to disclose a conflict of interest and relevant financial relationship, that individual will not be allowed to participate in the planning or delivery of content.

Learners must receive written information regarding disclosure of all relevant financial relationships before engaging with the accredited education. This written information may be in the form of a PowerPoint slide, and/or included in an activity brochure or activity agenda, in print or electronic format. If there are relevant financial relationships, a statement must be made that all such relationships have been mitigated. The absence of relevant financial relationships must also be disclosed in written information.

Appropriate mechanisms to mitigate relevant financial relationships will be identified by the planning committee and may include but are not limited to the following:

- An individual who has an identified conflict of interest will be asked to recuse themselves from all discussion/decision making processes where the conflict of interest would come into play.
- Revising the role of the individual with the COI so that the relationship is no longer relevant to the CIPD activity.
- Not awarding contact hours for a portion or all of the CIPD activity.
- Peer Review: A faculty member with a conflict of interest must submit his/her work to a panel for peer review. Recommendations of the panel, as it relates to the conflict, must be taken. If the faculty member refuses the recommendation they will be asked to resign and a new faculty member will be appointed. Peer review may also be invoked to review planning decisions.
- As part of the activity review and approval process, the MMC CIPD committee and/or leadership will make recommendations as to the need for an onsite review/audit of a given activity. Factors for making such a determination may include: jointly sponsored activity, a history of perceived bias if the activity is a repeat activity or high percent of faculty with identified Conflicts of Interest that have been resolved. Once a determination has been made that MMC CIPD should provide onsite review, staff are assigned to attend selected conferences and will document compliance
- CIPD activity participants may be surveyed about perceived commercial bias as part of the post-activity evaluation. If the educational planners and/or CIPD staff upon review of the learner evaluations, find a significant number of learners perceived commercial bias was present, the educational planners must query learners further as to the reasons such commercial bias was thought to be present. After such queries, if commercial bias was present then the activity will not receive accredited continuing education.
- MMC CIPD leadership serves as ongoing resources to provide training and answer questions from CIPD coordinators, course directors, presenting faculty and educational partners related to standards of practice in CIPD, Joint Accreditation Standards for Commercial Support, this and all other MMC CIPD policies.

Reviewed and approved: CIPD Committee, August 29, 2019.
 Revised and approved, March 23, 2020; August 19, 2020.