



# Planning Guide for Independence in Accredited Continuing Education

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



## Collect information about financial relationships

We ask those who may have a role in controlling the CE content to disclose all financial relationships they have had over the past 24 months with *ineligible companies* (drug, device, and other companies ineligible for accreditation; see page 2 for the full definition).



## Exclude owners or employees of ineligible companies

With a few exceptions, we exclude owners or employees of ineligible companies because their opportunity to insert commercial bias cannot be mitigated.



## Identify and mitigate relevant financial relationships

We determine which financial relationships might allow control of CE content related to the business lines or products of an ineligible company and take steps to prevent the insertion of bias towards commercial products or services.



## Disclose all relevant financial relationships to learners

We provide transparency to learners by informing them—prior to the CE activity—of the presence or absence of relevant financial relationships for all who were in control of the CE content, and that those relevant financial relationships were mitigated.



# 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?

## 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

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

## 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.*

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

## What needs to be disclosed?

**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?

## 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



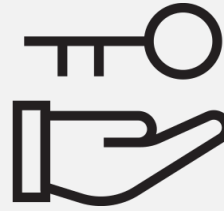
Examples: Peer  
reviewers, editors,  
CE staff


# How Do We Identify and Mitigate Relevant Financial Relationships?

## 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.*



# How Do We Identify and Mitigate Relevant Financial Relationships?

## Exclude owners and employees

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, 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

# How Do We Identify and Mitigate Relevant Financial Relationships?

## 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?

# How Do We Identify and Mitigate Relevant Financial Relationships?

## Mitigate relevant financial relationships

**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.**



### **Planners, reviewers**

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

# How Do We Identify and Mitigate Relevant Financial Relationships?

## 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).**

# Speaker Slide Presentations

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For educational activities that include presentation slides,



Remind speakers/presenters to include their disclosure information (or lack of) as a slide, prior to the start of the content. This may include phrasing such as: *"Disclosures: I have no disclosures/conflicts of interest"* or *"Disclosures: I received a research grant from (commercial company). This possible COI was reviewed and deemed irrelevant to the content of this presentation."*



CME presentation guidelines focus on ensuring educational quality, independence from commercial bias, and providing balanced information to learners. Presentations should promote improvements in healthcare and avoid promoting specific proprietary interests. They should also be based on scientific evidence and provide a balanced discussion of available treatment option

# ACCME Training Video Links

Helpful ACCME links regarding when its acceptable to use owners and employees of ineligible companies:

- <https://accme.org/resource/case-scenarios-when-it-acceptable-use-owners-and-employees-ineligible-companies/>
- <https://accme.org/resource/examples-of-content-that-is-is-not-related-to-the-business-lines-of-the-ineligible-company/>

For All Committee members/Planners/Speakers:

- <https://accme.org/resource/your-role-in-maintaining-trust-in-accredited-cme-video-for-planners-faculty-authors-and-reviewers/>

**ACCME's Standard 3 Policy:**

- <https://accme.org/rule/identify-mitigate-and-disclose-relevant-financial-relationships/>





Thank you for participating!

If you have any questions or concerns, please email:  
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