

TITLE	EEH ACME PROGRAM: IDENTIFICATION, MITIGATION, AND DISCLOSURE OF FINANCIAL RELATIONSHIPS OF SPEAKERS, PLANNERS, AND OTHER INDIVIDUALS INVOLVED IN ACCREDITED CME ACTIVITIES POLICY
PURPOSE	<ol style="list-style-type: none">1) To set forth the policy for ensuring accredited CME 1) presents learners with only accurate, balanced, scientifically justified recommendations, and (2) protects learners from promotion, marketing, and commercial bias. by Edward-Elmhurst Health's Accredited Continuing Medical Education Program ("ACME Program")2) To comply with the Illinois State Medical Society (ISMS) and the Accreditation Council for Continuing Medical Education (ACCME) Standards for Integrity and Independence in Accredited Continuing Education
APPLICABILITY	Edward-Elmhurst Health
DEI STATEMENT(S)	Edward-Elmhurst Health as an institution, and the Accredited CME Program as its supporter, is fighting systemic racism, institutionalized biases, and healthcare inequities. To build a more diverse healthcare community and reduce disparities and injustices in the medical profession, the ACME Program asks that speaker(s), content authors, planners, and others involved in Accredited CME activities are representative of all races, ethnicities, genders, gender identities, sexual orientations, generations, backgrounds. Additionally, material should be carefully reviewed to reflect linguistically appropriate content, narratives developed with an equitable lens, and key terms and concepts used in the context of health equity. When appropriate, conversations on how health equity and DEI+J impacts the educational topic should be included.
POLICY STATEMENT(S)	The Edward-Elmhurst Health Accredited CME Program shall only provide and award continuing medical education credit for educational activities that: (i) follow the procedures outlined in this policy; and (ii) are approved by the Program & Education Committee; and/or the Chair of the Program & Education Committee; and/or the majority members of the Program & Education Committee. Any activity that fails to comply with the approved standards will be suspended from receiving <i>AMA PRA Category 1 Credit™</i> and held to corrective action. If no corrective action is taken, credit is suspended indefinitely, and the activity planner(s) is not permitted to apply for <i>AMA PRA Category 1 Credit™</i> in the future.
DEFINITION(S)	<ul style="list-style-type: none">• <u>Ineligible Company</u>: An ineligible company is any entity producing, marketing, reselling, or distributing health care goods or services consumed by or used on patients. Providers of clinical services directly to patients are not considered ineligible companies. Examples of ineligible companies can be found here.• <u>Financial Relationships</u>: The owners and employees of ineligible companies are considered to have unresolvable financial relationships and must be excluded from participating as planners or faculty, and must not be allowed to influence or control any

aspect of the planning, delivery, or evaluation of accredited continuing education

- Many healthcare professionals have financial relationships with ineligible companies. These relationships must not be allowed to influence accredited continuing education. The EEH ACME Department, the Program & Education Committee, the Activity Planner(s), the Speaker(s), and anyone involved in the accredited CME activity is responsible for relevant financial relationships between individuals in control of educational content and ineligible companies and managing these to ensure they do not introduce commercial bias into the education. **Financial relationships of any dollar amount are defined as relevant if the educational content is related to the business lines or products of the ineligible company.**
- Accredited CME Activity: An activity sponsored by the Edward-Elmhurst Health ACME Department (8681) designated for a specified amount of *AMA PRA Category 1 Credit™*.
- Planner(s): An individual or group of individuals involved in the planning process and implementation, facilitation, or moderation of an accredited CME Activity.
- Planner(s): An individual or group of individuals presenting, speaking, or delivering content at an accredited CME activity.
- Committee Member: All members of the Program and Education Committee who are responsible for approving and generating accredited CME activities.

PROCEDURE

POLICY DESCRIPTION

Speaker(s), Presenter(s), Author(s), Moderator(s), Planner(s) and Committee Member(s) of any Edward-Elmhurst Health Accredited CME Activities must disclose relationships with any ineligible companies if both (a) the relationship is financial and occurred in the past 24 months and (b) the individual can affect the content of the accredited CME activity. Such disclosures must include the (1) name of the individual, (2) the name of the ineligible company, and (3) the nature of the relationship the person has with each ineligible company.

If there is no relevant financial relationship(s), Speaker(s), Presenter(s), Author(s), Moderator(s), Planner(s) and Committee Member(s) of any Edward-Elmhurst Health Accredited CME Activities must disclose that there are no financial relationships with any ineligible companies.

1. Any disclosures must be made to the participants prior to the start of the accredited CME activity in writing (via presentations or during registration), verbally at the start of the activity, or published in the activity materials.

Accredited providers must take the following steps when developing accredited continuing education. Exceptions are listed at the end of Standard 3.

- Collect information: Collect information from all planners, speakers, and others involved in accredited CME activities about all their financial relationships with ineligible companies within the prior 24 months. There is no minimum financial threshold; individuals must disclose all financial relationships

with ineligible companies, regardless of the amount. Disclosures must be made regardless of the individual's view of the relevance of the relationship to education.

- Disclosure information must include:
 1. The name of the ineligible company with which the person has a financial relationship.
 2. The nature of the financial relationship. Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; 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.
- Exclude owners or employees of ineligible companies: Review the information about financial relationships to identify individuals who are owners or employees of ineligible companies. These individuals must be excluded from controlling the content or participating as planners or faculty in accredited CME activities. There are three exceptions to this exclusion—employees of ineligible companies can participate as planners or faculty in these specific situations:
 1. When the content of the activity is not related to the business lines or products of their employer/company.
 2. When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, they do not make care recommendations.
 3. When they are participating as technicians teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.
- Identify relevant financial relationships: Review the information about financial relationships to determine which relationships are relevant. Financial relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.
- Mitigate relevant financial relationships: Take steps to prevent all those with relevant financial relationships from inserting commercial bias into the content.
 1. Mitigate relationships prior to the individual(s) assuming their roles in the accredited CME activity.
 2. Document the steps taken to mitigate relevant financial relationships.
- Disclose all relevant financial relationships to learners: Disclosure to learners must include each of the following:
 - a. The names of any individuals with relevant financial relationships.
 - b. The names of the ineligible companies with which they have relationships.
 - c. The nature of relationships.

- d. A statement that all relevant financial relationships have been mitigated.
- Identify ineligible companies by their name only. Disclosure to learners must not include ineligible companies' corporate or product logos, trade names, or product group messages.
- Disclose the absence of relevant financial relationships. Inform learners about planners, faculty, and other individuals involved in accredited CME activity (either individually or as a group) with no relevant financial relationships with ineligible companies.
- Learners must receive disclosure information in a format that can be verified at the time of accreditation, **before** engaging with the accredited CME activity.
- Exceptions: Accredited providers do not need to identify, mitigate, or disclose relevant financial relationships for any of the following activities:
 1. Accredited education that is non-clinical, such as leadership or communication skills training.
 2. Accredited education where the learner group is in control of content, such as a spontaneous case conversation among peers.
 3. Accredited 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. When accredited providers serve as a source of information for the self-directed learner, they should direct learners only to resources and methods for learning that are not controlled by ineligible companies.

CROSS REFERENCE(S) [ACCME Standards for Integrity and Independence in Accredited Continuing Education](#)

REVISED: 9/10/20, 08/31/2022

Approved By: Program & Education Committee, 9/14/01, 3/12/10, 11/15/13, 1/18/18, 3/23/18, 5/9/19, 9/10/2020, **09/08/2022**