Use this flowchart at the beginning of your planning process for CME activities to ensure independence from ACCME-defined commercial interests. Start at A below. For step-by-step instructions for using this flowchart, visit www.accme.org/tutorials/COI-flowchart.

A

Is the content related to products or business lines of an ACCME-defined commercial interest?

Yes

→ For each person in control of content for the CME activity…

B

Is the person an employee/owner of an ACCME-defined commercial interest? (SCS 1)

Yes

→ Employees of ACCME-defined commercial interests can have no role in the planning or implementation of CME activities related to their products/services.¹ (SCS 1)

→ Done!

No

→ Done!

Is the person an employee/owner of an ACCME-defined commercial interest? (SCS 1)

Yes

→ Done!

No

→ C

Does the person have a relevant financial relationship with an ACCME-defined commercial interest? (SCS 2.1)

Yes

→ Disclosure to Learners

Before the activity, disclose to learners that there are no relevant financial relationships with ACCME-defined commercial interests for anyone who was in control of the content of the activity. (SCS 6.2)

→ Done!

No

→ Disclosure to Learners

Before the activity, disclose to learners that the person(s) have no relevant financial relationship(s) with ACCME-defined commercial interests to disclose. (SCS 6.2)

→ Done!

→ Is there a relevant financial relationship? If you can check all 4 boxes below, you’ve identified a relevant financial relationship with an ACCME-defined commercial interest that must be resolved before the activity occurs.

- Financial relationship between person in control of content (or their spouse/partner) and an ACCME-defined commercial interest
- Any amount ($)
- In the past 12 months
- Products/services of the ACCME-defined commercial interest (with which they have the financial relationship) are related to the content of the CME activity

→ D

Yes, there is a relevant financial relationship.

Provider takes an active role to resolve conflicts by:
- recusing person from controlling aspects of planning and content with which they have a conflict of interest and/or
- using peer-review of planning decisions (for planners) by person(s) that do not have conflicts of interest related to the content and/or
- using peer-review of content (for authors/presenters) by person(s) that do not have conflicts of interest related to the content and/or
- making sure to ensure that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines) and/or
- using other methods that meet ACCME’s expectations²

→ Implement your process² to resolve the potential conflict-of-interest arising from their relevant financial relationship. (SCS 2.3)

→ Disclosure to Learners

Before the activity, disclose to learners the name(s) of the individual(s), name of the ACCME-defined commercial interest with which they have a relevant financial relationship(s) and the nature of the relationship. (SCS 6.3)

→ Done!

Footnotes

1. The use of employees of ACCME-defined commercial interests as faculty and planners or in other roles where they are in a position to control the content of accredited CME is prohibited, except in specific situations. For more information, visit this FAQ regarding commercial employees.

2. There are a range of approaches providers can use to resolve potential conflicts of interests. For more information, visit ACCME’s Provider Examples of Compliance and Noncompliance for Criterion 7 on www.accme.org.