

Mechanism for Mitigation of Conflicts of Interest to Prevent Commercial Bias

1. The KH CME Executive Group will collect information from all planners, faculty, and others in control of educational content 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, regardless of the amount, with ineligible companies. Individuals must disclose regardless of their view of the relevance of the relationship to the education. Disclosure information must include:
 - a. The name of the ineligible company with which the person has a financial relationship.
 - b. 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.
 - c. Companies that are ineligible to be accredited in the ACCME System (ineligible companies) are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

(Re: ACCME, Standard 3)

2. The relevance of conflicts will be determined by the program's Executive Group (EG) while reviewing an application for activity Cat. 1 certification. The EG's decisions, actions to mitigate relationships of those in control of content, and related disclosures will be recorded in the minutes of an EG meeting.

3. Conflicts of reviewed disclosers not resolved by the EG will be referred for peer or institutional review. Specifically:

- Activity Planners and other Advisory Group Members having content knowledge and discloser familiarity.
- Extramural consultants having significant activity content knowledge and discloser familiarity.
- Institutional Administrators, or their designees, e.g., Director of Medical Education, Vice President for Medical Affairs
- Relevant scientific paper or article citation by the disclosing author - already peer-reviewed and judged to be commercially disinterested.

4. Presenters, speakers, authors, planners, reviewers (i.e., anyone in control of educational content) can be asked to submit reference(s) supporting their perception of irrelevant conflict.

5. Notice of conflict resolution or failure to resolve will appear in the minutes of an EG meeting. Failure to resolve a commercial conflict issue will disqualify the reviewed person from participating in a particular CME activity.