Flowchart for the Identification and Resolution of Personal Conflicts of Interest

Meeting the Expectations of ACCME’s Criterion 7

(Last updated: February 1, 2017)

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/coiflowchart.

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**The diagram**

- **A**
  - Is the content related to products or business lines of an ACCME-defined commercial interest? (Yes/No)
  - **Yes**: For each person in control of content for the CME activity...
  - **No**: 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!

- **B**
  - Is the person an employee/owner of an ACCME-defined commercial interest? (Yes/No)
  - **Yes**: 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!
  - **No**: 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
    - 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

- **C**
  - Does the person have a relevant financial relationship with an ACCME-defined commercial interest? (Yes/No)
  - **Yes**: 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 expectations
  - **No**: Yes, there is a relevant financial relationship.
    - Implement your process to resolve the potential conflict-of-interest arising from their relevant financial relationship. (SCS 2.3)
    - Done!
    - 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 6.4)
      - Done!

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**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 Ask ACCME frequently-asked-question 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.