

POLICY NUMBER: 620.2

POLICY TITLE: Office of CME Commercial Support, Conflict of Interest and Disclosure Policy

I. PURPOSE

This policy is to ensure the identification and resolution of commercial support and conflicts of interest (COI) relevant to LMU-DCOM Continuing Medical Education (CME) activities.

II. POLICY STATEMENT

To ensure balance, independence, objectivity, and scientific rigor in all its individually sponsored or jointly sponsored educational programs and control of commercial interest (an entity producing, marketing, selling, re-selling, or distributing health care products used by or on patients), all activity directors, planners, course directors, committee members, and presenters participating in any LMU-DCOM CME sponsored program must disclose, verbally or written (e.g., slide presentations) to the program audience any real or apparently conflict(s) of interest (COI), or lack thereof, that may have a direct bearing on the subject matter of the continuing education activity. This includes all relevant financial relationships with an AOA-defined commercial interest or an ACCME-defined ineligible company occurring in the past 12 months for themselves, their spouse, and/or life partner and pertains to relationships with pharmaceutical companies, biomedical device manufactures, or other corporations whose products or services are related to the subject matter of the presentation topic. The intent of this policy is not to prevent a speaker with a potential conflict of interest from making a presentation. It is merely intended that any potential conflict should be identified openly so that the listeners may form their own judgments about the presentation with the full disclosure of the facts. It remains for the audience to determine whether the speaker's outside interests may reflect a possible bias in either the exposition or the conclusions presented. If no relationships exist, this must be disclosed in the same manner.

The LMU-DCOM CME office must mitigate any relationship with an ineligible company and resolve any conflicts of interest prior to the educational activity. Disclosure information is on file in the CME office and available for review upon request.

III. DEFINITIONS

CME = Continuing Medical Education

COI = Conflict of Interest

Ineligible company = a company whose primary business is producing, marketing, selling, re-selling, or distributing health care products used by or on patients.

IV. AUDIENCE

This policy applies to all activity directors, planners, course directors, committee members, and presenters participating in any LMU-DCOM-sponsored CME program.

V. COMPLIANCE

N/A

VI. ROLES AND RESPONSIBILITIES

LMU-DCOM Administration: The mission of the Office of Continuing Medical Education (CME) at LMU-DCOM will remain consistent with the mission of the DeBusk College of Osteopathic Medicine in its commitment to prepare outstanding osteopathic physicians who are committed to the premise that the cornerstone of meaningful existence is service to humanity.

Responsible Office: LMU-DCOM Office of Continuing Medical Education

Responsible University Officer: LMU-DCOM Director of CME

Policy Oversight Committee: LMU-DCOM Policy Process Committee

VII. STANDARDS

N/A

VIII. PROCEDURE

All potential conflicts of interest (COI) are disclosed in CME activity program syllabi, Faculty Disclosure Forms, and/or prior to presentations, lectures, the online learning platform's landing page, or other educational activity (presentation slide and/or verbally). For example, speakers will need to document on presentation slides one of the following: 1) Neither I, nor an immediate family member (parent, sibling, spouse, partner, or child), has any financial relationship with or interest in any commercial interest connected with this presentation or 2) I have, or my immediate family member (parent, sibling, spouse, partner, or child) has a financial relationship with or interest in a commercial interest connected with this presentation.

All commercial support, both monetary and in-kind, must be in the form of an educational grant and payable to Lincoln Memorial University and must include a **Commercial Support Agreement** between the provider and the commercial interest providing support.

Mitigation of identified Conflicts of Interest: All Faculty Disclosure Forms are reviewed by the LMU-DCOM Office of CME for any Conflicts of Interest. If a conflict of interest is present and cannot be mitigated by the Office of CME and/or the CME activity planning committee, no CME credit will be awarded to the content in question.

Consequences of non-compliance include CME sponsor accreditation probation and/or revocation.

This policy is effective as of the date above and shall remain effective until amended or terminated by the Dean of LMU-DCOM.

IX. CONTACT INFORMATION

For more information regarding this policy, please contact the LMU-DCOM Director of Alumni Services and CME at 423-869-6252.

X. DOCUMENT HISTORY

Policy Order Number: DCOM CME Disclosure Policy 1 Effective Date June 1, 2016

Version S23.1:

Approved by LMU DCOM Policy Process Committee 06/02/23

Approved by LMU Legal 06/15/23

XI. FORMS

<http://dcomcme.LMUnet.edu>

<https://www.lmunet.edu/debusk-college-of-osteopathic-medicine/do/office-of-cme-preceptor-development/preceptor-faculty-development/index>