

POLICY AND PROCEDURES FOR IDENTIFYING AND RESOLVING CONFLICTS OF INTEREST

Conflict of Interest (COI) is an apparent or real financial relationship that faculty, immediate family of faculty, the sponsor, or any individual having control over any aspect of a CME activity, have with a pharmaceutical or equipment company that can be perceived as a conflict.

Albert Einstein College of Medicine of Yeshiva University's policy and procedure for identifying conflicts of interest requires that:

- 1) All planners, speakers and authors in a position to control the content of a CME activity must complete a Conflict of Interest and Content Validation Agreement in advance of the activity. Individuals who refuse to disclose are disqualified from any role in planning, managing, presenting, or evaluating.
- 2) Primary responsibility for identifying, addressing and attempting to resolve any COI rests with the CME COI Committee. However, the Associate Dean/Designee reserves the right to appoint an Einstein faculty with specific expertise to assist with the review process as the need arises.
- 3) Conflicts of Interest are identified through an analysis of the information disclosed and an understanding of the planned content of the CME activity.
- 4) The COI Committee and/or an appointed reviewer will provide certification as to having reviewed all conflict of interest disclosures and determining a mechanism for resolution.
- 5) Instances where the reviewer has a conflict of their own, another appointed reviewer with no COI will review the disclosure.
- 6) The Center for Continuing Medical Education (CCME) shall convey any information disclosed by the faculty member(s) and anyone else who can influence the content of the activity to the CME audience by: (1) including a description in the printed material; and/or (2) by display of the information on a slide shown in the meeting room at the time of presentation; and/or (3) by the statement being read aloud by the moderator preceding the faculty member/participant's presentation.

Albert Einstein College of Medicine of Yeshiva University's policy and procedure for resolving conflicts of interest requires that:

- 1) **Attestation** Presenters will be asked to agree in writing that their disclosed relationships will not bias or influence their involvement and that their material will be evidence-based.
- 2) **Content Validation through peer review of materials** The presentation cannot favor the commercial interest, and must include alternatives to drugs/devices manufactured by the commercial interest where possible.
- 3) **Evaluation** Attendees will be asked to review the activity for the presence of bias, and this information will be made known to the planners. Additionally, the CCME may assign a monitor to evaluate the presentations.
- 4) **Disqualification** Planners, presenters, or authors whose conflicts are irresolvable or who are perceived to be biased will be eliminated from the activity.

Suggested Mechanisms for Resolving COI:

- 1) Review of content before presentation or publication by commercially disinterested peers
- 2) Require that recommendations for clinical care be based on the best available published evidence or best practice guidelines
- 3) Choosing another faculty member who does not have a relationship to the commercial interests related to the content
- 4) Changing the focus of the CME activity
- 5) Changing the role of a person with a conflict of interest within the activity
- 6) Limiting role of the person to reporting recommendations based on formal structured reviews of the literature with the inclusion and exclusion criteria stated (evidence based)
- 7) Divestiture of commercial relationship causing the conflict