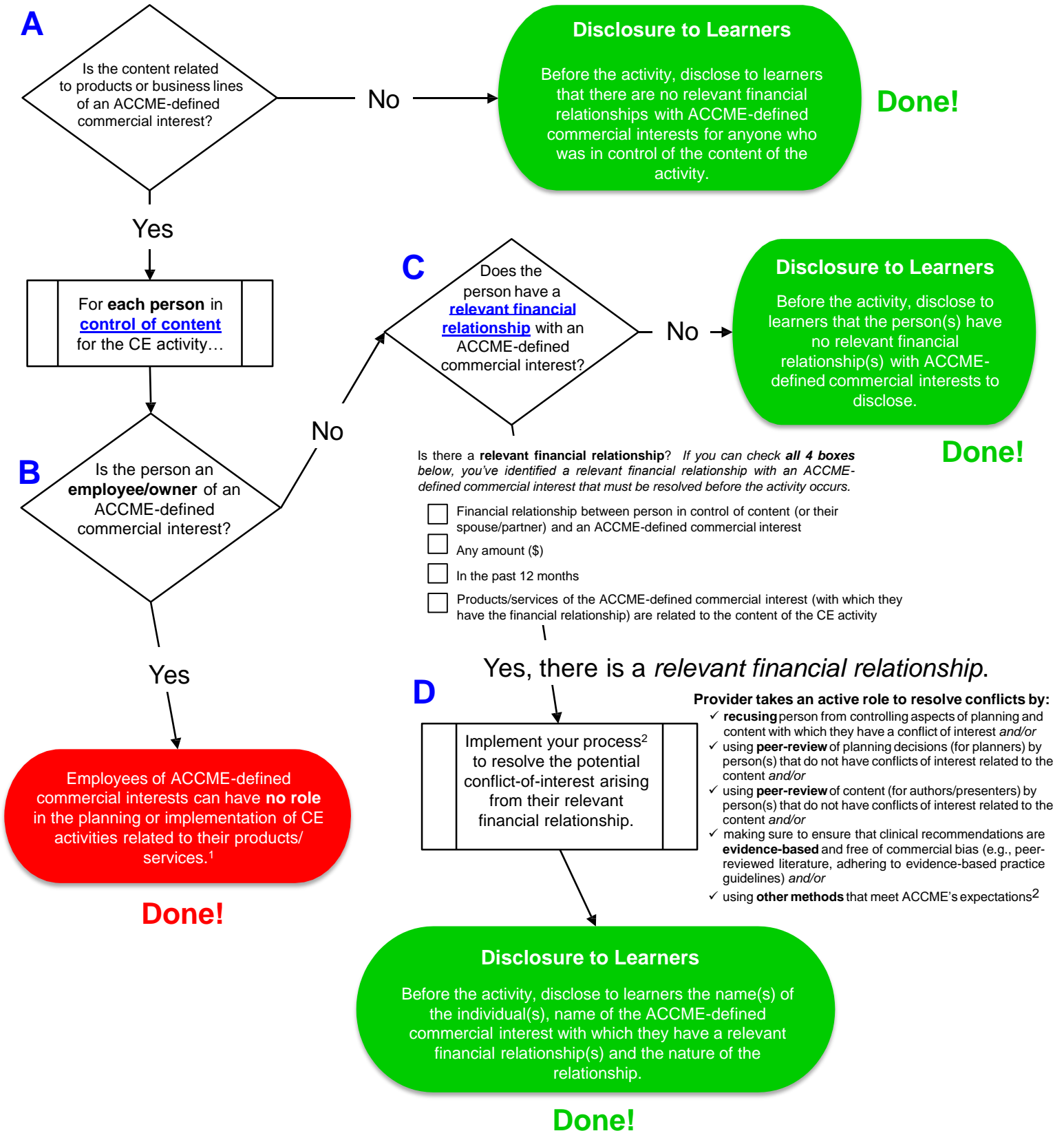# Flowchart for the Identification and Resolution of Personal Conflicts of Interest

(Last updated: February 1, 2017)

Use this flowchart at the beginning of your planning process for CE 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**.

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

— **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.

Done!

Yes ↓

For **each person** in **control of content** for the CE activity…

↓

B Is the person an **employee/owner** of an ACCME-defined commercial interest?

— **No** →

C Does the person have a **relevant financial relationship** with an ACCME-defined commercial interest?

— **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.

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 CE activity

Yes, there is a *relevant financial relationship*.

B — Yes ↓

Employees of ACCME-defined commercial interests can have **no role** in the planning or implementation of CE activities related to their products/services.[1]

Done!

D Implement your process[2] to resolve the potential conflict-of-interest arising from their 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 expectations[2]

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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.

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 CE 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. ACPE-accredited providers can find examples and resources on the ACPE website.