SAPS CME
SOUTHERN ALLIANCE FOR PHYSICIAN SPECIALTIES CONTINUING MEDICAL EDUCATION

FINANCIAL DISCLOSURE IDENTIFICATION & MITIGATION POLICY

The Accreditation Council for Continuing Medical Education (ACCME) requests all accredited providers of accredited continuing education (Southern Alliance for Physician Specialties CME) have a mechanism in place for identifying and mitigating potential relevant financial relationship interest prior to an educational activity.

Purpose: SAPS CME is committed to delivering unbiased, independent, and scientifically rigorous continuing education in compliance with ACCME Standards for Integrity and Independence. All planners, faculty, and content creators must disclose any financial relationships with ineligible companies from the past 24 months, regardless of amount. Failure to comply leads to disqualification, and disclosures are reviewed and shared with learners prior to the event**.**

Definitions

- **Ineligible Company:** Any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.
- **Relevant Financial Relationships:** Financial relationships of any amount (including salary, consulting fees, research grants, stock ownership) that create a relevant financial relationship and occurred within the past 24 months

1. **Collect Disclosures:** All individuals participating in the activity must submit a disclosure form prior to their involvement. Activity directors, Planning Committee members, faculty/authors, and all other contributors engaged in accredited Continuing Education (CE) activities are required to disclose any financial relationships with ineligible organizations to the SAPS CME Committee, within the prior 24 months.
   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

   By completing and signing the Disclosure Form, the contributor agrees that any relevant relationships will not be biased or otherwise influence their involvement in the accredited CE activity. Practice recommendations will be limited to those based on the best available evidence (or absence of evidence), and recommendations will be consistent with accepted medical practice. They also agree to all other mandatory ACCME disclosure guidelines – Standard 3.1.
2. **Owners or Employees** Review the information about financial relationships to identify individuals who are owners or employees of ineligible companies. (Attachment A)These individuals must be excluded from controlling content or participating as planners or faculty in accredited education, unless they meet **one of the three e**xceptions to this exclusion:
   a. When the content of the activity is not related to the business lines or products of their employer/company.
   b. When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations.
   c. When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.
3. **Identify relevant financial relationships**: The SAPS CME Committee or its designated representative, in cases involving joint providership, will review the information about financial relationships to determine which relationships are relevant. Financial relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.

4. **Mitigation Steps**
   a. ***Peer Review/Independent Content Validation*** – **All individuals who declare financial relationships.**
      The content of the presentation must be evaluated by an independent member of the planning committee or by speakers who **do not have any relevant financial relationships** with an ineligible entity (**Attachment A**)
      An informed learner or peer will assess the material. The depth of the review process should be determined by the specific context. If the reviewer is already acquainted with the presenter's previous work and viewpoints, a brief discussion may be sufficient to ensure the presentation maintains independence and balance. Conversely, if the reviewer lacks such familiarity, a more comprehensive evaluation—such as a detailed review of slides and handouts, or an extended conversation—may be necessary to confirm the objectivity and impartiality of the content.`
   b. **CME planners** control decisions that occur before content is developed. Mitigation steps must also be taken to ensure the planners' impact doesn't potentially bias the activity content and ensure independence.
      Mitigation strategies that are appropriate for planners with a relevant financial relationship include:

Ensuring that the planner is recused from any aspects of planning content that is related to their financial relationship, OR

Having another planner with no relevant relationship review the decisions of the planner before they are implemented.

c. ***Altering Control Over Content:*** *An* individual's control of accredited CE content may be altered to remove the opportunity to affect content related to the products/services of a commercial interest. For example:

d. ***Select another person to control that part of the content -*** If a proposed presenter/author has a relevant financial relationship linked to the content, select another person who does not have a relationship with ineligible companies related to the content.

e. ***Change the content of the person's assignment -*** The role of a person with a relevant financial interest can be changed within the activity so that he/she is no longer teaching about issues relevant to the products/services of an ineligible company. *For example, an individual with a relevant interest regarding products for treatment of a disease state could address the pathophysiology or diagnosis of the disease rather than the therapeutics.*

f. ***Limit the content to a report without recommendations -*** If an individual has been funded by an ineligible company to perform research, the individual(s) presentation may be limited to the data and results of the research. Someone else can be assigned to address broader implications and recommendations.

g. ***Restrict recommendation sources to those grounded in the best available evidence*** – Rather than permitting individuals with financial interests to present personal recommendations or independently select supporting evidence, their role should be confined to reporting recommendations derived from formal, structured literature reviews with clearly stated inclusion and exclusion criteria (evidence-based). For instance, they may present summaries from systematic reviews published in peer-reviewed sources.

h. ***Modifying Financial Relationships:*** If a contributor's association with an ineligible company has changed or ended, and therefore no longer presents a risk of bias, this change must still be disclosed to learners for 24 months, even if it is not pertinent to the content.

i. ***Exclusion:*** Contributors identified as having potential relevant financial relationships or exhibiting bias may be excluded from serving as resources (such as committee members, instructors, or authors) for future certified accredited continuing education (CE) activities.

5. **Disclosure to Learners:** The organization will inform learners of the presence or absence of relevant financial relationships, including names of individuals, companies, the nature of the relationship, and include a mitigation statement (**Attachment G)**.

Previous Speaker Evaluations: Historical evaluation data (**24 months**) pertaining to individual faculty members may be used to document the status of relevant financial interests.

Refusal to Disclose: Individuals who decline to provide disclosure information will be excluded from participation in the CME activity. Those who refuse to disclose relevant financial relationships are not eligible to act as an activity director, planning committee member, instructor, or author for a CE activity, nor may they assume responsibility for or exert control over the development, management, presentation, or evaluation of said activity.

The SAPS CME Committee will maintain written records detailing the resolution of all identified or perceived relevant financial relationships.

In the uncommon circumstance that SAPS CME cannot resolve a relevant financial interest, SAPS CME will not award *AMA PRA Category 1 Credit(s)™*.