



Compliance with CME Disclosure Policy

CME Courses and Enduring Materials

Disclosure of Financial Relationships

In accordance with the *OTA Conflict of Interest Policy* and *OTA Mandatory Disclosure Policy*, **ALL** individuals in control of content (includes planners, moderators, speakers, etc.) of a CME activity must disclose:

1. All Financial Relationships with ineligible companies* over the previous 24 months, and
2. Discussion of Off-label (Unapproved)/Investigational Uses of Products

Employee/owner Relationships of ACCME-defined Ineligible Companies:* If an individual in control of content discloses an employee/owner relationship of an ACCME-defined ineligible company*, OTA staff should contact the individual to obtain more information to better understand the nature of the employee relationship. *These individuals must be excluded from controlling content or participating as planners or faculty in accredited education. There are three exceptions to this exclusion—employees of ineligible companies can participate as planners or faculty in these specific situations:*

- 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.

Disclosure Review Process

OTA staff are responsible for reviewing and mitigating the planners' and faculty's potential conflicts of interests. Planners, chairs, or peer reviewers may assist in reviewing and mitigating faculty's potential conflicts of interest if they do not have any financial relationships.

* ACCME defines **Ineligible companies** are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Further information is provided on [ACCME's website](#).

Scientific Meetings/OTA Annual Meeting

Disclosure of Financial Relationships

The OTA staff and Program Committee are responsible for reviewing financial relationships disclosed by **ALL** abstract authors/presenters and session faculty. The OTA staff and Program Committee/COI Subcommittee are responsible for mitigating financial relationships disclosed by **presenting** abstract authors/presenters and session faculty. Prior to fulfilling this responsibility, the Program Committee/COI Subcommittee members also must disclose and their relevant financial relationships be reviewed and mitigated by the appropriate individual(s).

In accordance with the *OTA Conflict of Interest Policy* and *OTA Mandatory Disclosure Policy*, **ALL** authors of a proposed abstract and/or session must disclose:

1. All Financial Relationships with ineligible companies* over the previous 24 months, and
2. Discussion of Off-label (Unapproved)/Investigational Uses of Products

For Multi-Center Studies/group abstract authorship, only the presenting/corresponding authors are required to disclose.

Employee/owner Relationships of ACCME-defined Ineligible Companies:* If an abstract author discloses an employee/owner relationship of an ACCME-defined ineligible companies*, **OTA staff** should contact the individual to obtain more information to better understand the nature of the employee/owner relationship and the individual's involvement in the abstract submission. The abstract should be removed from consideration as an oral abstract presentation, and the program committee chair should then review this information and the abstract to consider the abstract as a poster presentation, which is not designated for *AMA PRA Category 1 Credit™*.

There are three exceptions to this exclusion—owners/employees of ineligible companies can participate as faculty in these specific situations:

- 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.

* ACCME defines **Ineligible companies** are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Further information is provided on [ACCME's website](#).

Stock Ownership:

- Individuals who own stock (not through a mutual fund or pension plan) in **privately held ineligible companies** are considered owners or employees.
- Individuals who own stock in publicly traded ineligible companies are **not** considered owners or employees.

Disclosure Review Process

OTA staff are responsible for reviewing and mitigating any potential, relevant conflicts of interest for all Program Committee members. **The Program Committee Chair (only) is responsible for reviewing, approving mitigation strategies, and overseeing conflict mitigation** for any potential, relevant conflicts of interest for the Program Committee members. If the Program Committee chair has relevant conflicts of interest, the Program Committee Co-Chair or another member of the Program Committee who has **no** relevant conflicts of interest will assist in reviewing, approving mitigation strategies, and overseeing conflict mitigation.

OTA Staff are responsible for reviewing and proposing mitigation strategies for ALL accepted abstract author/abstract presenters and session faculty. **The Program Committee Chair and/or Program Committee are responsible for reviewing, approving mitigation strategies, and overseeing conflict mitigation** for any potential conflicts of interest for ALL **accepted** abstract authors/abstract presenters and session faculty.

Persons involved in the planning or delivery of the educational content may be requested to provide more detail regarding the clinical content of their presentation and/or financial relationship to help staff with determination.

No abstract proposals should be accepted until **all** authors listed have completed a disclosure via the OTA online abstract management system, except in the case of Multi-Center Studies/group abstract authorship, where only the presenting/corresponding authors are required to disclose

Mitigation of Conflicts of Interest for OTA CME Activities

Once determination of relevant conflicts has been completed for all persons who are in control of accredited educational content, OTA staff will select and enact a mitigation strategy for all relevant conflicts which will be documented and implemented before each individual begins their role.

Mitigation strategies may include but are not limited to divesting the financial relationship, recusal from controlling aspects of planning and content with which there is a financial relationship (planners only), peer review of planning decisions by persons without relevant financial relationships (planners only), peer review of content by persons without relevant financial relationships (faculty only), and/or attesting that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines).

Disclosure to Learners

Disclosure information must be provided to learners prior to engaging with the accredited education.

Disclosures may be presented in the front matter/CME information page of an online activity, in the printed or digital program book, and/or on a mobile app.

For all disclosures, the information presented must include the name of the individual, their role in the educational activity, name of the ineligible company(ies) with which they have a relevant financial relationship(s), the nature of the relationship(s), and a statement that all relevant financial relationships have been mitigated. For individuals who do not have a relevant financial relationship, the information presented must include the name of the individual (or individuals as a group), their role in the education and that they have no relevant financial relationships.

Compliance With ACCME Guidelines and OTA Policy Highlights

The OTA Policy on Compliance with CME Disclosure is designed to ensure quality, objective, balanced, and scientifically rigorous OTA CME activities. All potential conflicts of interest are identified and mitigated prior to an individual's participation in an OTA CME activity. Beyond disclosure of financial relationships, OTA CME faculty are required to disclose to the OTA and to learners when they plan to discuss or demonstrate pharmaceuticals and/or medical devices and/or medical or surgical procedures that involve "off-label" use device or pharmaceutical. The OTA is committed to providing learners with commercially unbiased CME activities.

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