

AMCP's MECHANISMS FOR RESOLVING CONFLICT OF INTEREST

The Accreditation Council for Continuing Medical Education (ACCME) requires all accredited providers of continuing medical education (CME) to have a mechanism in place for identifying and resolving potential conflicts of interest (COI) prior to the educational activity. The ACCME defines "conflict of interest" as follows: *"When an individual has an opportunity to affect CME content about products or services of a commercial interest with which he/she has a financial relationship."*

The Academy of Managed Care Pharmacy (AMCP) employs the following as a list of resolution mechanisms for resolving COI. Resolution mechanisms will vary depending on the nature of the financial relationship.

For Educational Programming - CPE/CME Activities:

1. **Signed Attestation:** By completing and signing the Attestation Section of the Disclosure Form, the speaker agrees that said conflicts or relationships will not bias or otherwise influence their involvement in the CPE/CME activity, practice recommendations will be limited to those based on the best available evidence (or absence of evidence), and recommendations will be consistent with generally accepted medical practice. They also agree to all other mandatory ACCME disclosure guidelines.
2. **Audience Evaluation:** Attendees will be advised of their right to expect non-biased presentations, and queried regarding their impressions concerning bias (or the absence of bias) within the activity. AMCP staff and faculty/authors will receive copies of the evaluation summaries and comments.
3. **Speaker Disclosure Slide:** Presenters are required to show a disclosure slide to the audience at the beginning of their presentation.
4. **Follow-up Phone Call:** AMCP's Education Department identifies someone to follow-up with contributor by phone to discuss ways to avoid perception of bias due to disclosed relationships. Staff sends follow-up letter to document resolution.
5. **Altering Control over Content:** An individual's control of CPE/CME content can be altered to remove the opportunity to affect content related to the products/services of a commercial interest. For example:
 - a. **Select someone else to control that part of the content** - If a proposed speaker/author has a conflict of interest related to the content, choose someone else who does not have a relationship to the commercial interests related to the content.
 - b. **Change the content of the person's assignment** - The role of a speaker/author with a conflict of interest can be changed within the CPE/CME activity so that he/she is no longer teaching about issues relevant to the products/services of the commercial interest.
 - c. **Limit the content to a report without recommendations** - If an individual has been funded by a commercial interest to perform research, the individual's presentation may be limited to the data and results of the research. Someone else should be assigned to address broader implications and recommendations.

6. **Audit and Evaluation:** Either a staff person from AMCP's Education Department or an informed member of the Program Planning & Development Committee will be present to evaluate the CPE/CME activity. This evaluator will be asked to complete a formal, detailed evaluation to measure any bias in the activity.
7. **Review of Content:** Both a staff person from AMCP's Education Department and a staff person from the Postgraduate Institute of Medicine, AMCP's accredited provider of CME, are required to review the content of the slides prior to the presentation. The reviewer will be asked to complete a formal evaluation to measure whether any bias was in the presentation and, if so, what resolution mechanism was provided to the contributor. Reviewers must also measure whether the resolution was adhered during the presentation.
8. **Altering Financial Relationships:** Should a contributor's relationship with commercial interest has changed or discontinued, and in doing so, no duty remains to introduce bias into the content. Although not relevant to COI, relationship must be disclosed to learners for 12 months.
9. **Elimination:** Persons who are perceived as either manifesting conflicts of interest or being biased may be eliminated from consideration as resources (committee members, faculty, authors, etc.) in subsequent accredited CPE/CME activities.

Additional Resolution Mechanisms for the Program Planning & Development Committee (PPDC) Members Only

10. **Signed Annual Statement:** By completing and signing the Annual COI form, the committee member agrees to recuse him/herself from the discussion and vote on the relevant submitted activity.
11. **Relationship with Industry Statement:** This statement will be read at the beginning of each committee meeting. It reminds members of AMCP's policy to have member recuse him/herself from discussion and vote on possible conflict of interest items.
12. **Disclosure to Peers and Activity Audience:** Committee disclosure information will be shared with peers and any relevant activity audiences.

AMCP's POLICIES & PROCEDURES REGARDING DISCLOSURES OF FINANCIAL RELATIONSHIPS AND COMPETING INTERESTS WITH INDUSTRY AND OTHERS

The Academy of Managed Care Pharmacy is committed to ensuring balance, independence, objectivity, and scientific rigor in their educational programming activities. Fulfilling this commitment depends in large measure on ensuring member and public confidence in the Academy's integrity. AMCP recognizes that the expertise and involvement of its faculty and members in their practice, research, and other volunteer and private activities, unavoidably will lead to the development of interests and the formation of relationships that could be adverse to or inconsistent with certain Academy interests. Therefore, AMCP has sought to define an appropriate and workable policy and process to identify and address such competing interests and relationships of faculty members involved in activities of the Academy with other outside interests and entities.

Faculty members are asked to complete a "*Statement of Policy Regarding Assurance of Balance, Disclosure & Non-Commercialization*" form. The document asks whether the faculty has a current or recent significant financial interest or affiliation in relation to the educational program and/or a financial interest/arrangement or affiliation with one or more organizations that could be perceived as a real or apparent conflict of interest in the context of the subject of the presentation. AMCP requires that all faculty members must disclose to learners any relevant financial relationship(s), to include the following information:

1. The name of the individual
2. The name of the commercial interest(s)
3. The nature of the relationship the person has with each commercial interest

AMCP also requires that all faculty members complete an Accreditation Council for Continuing Medical Education (ACCME) approved Conflict of Interest (COI) Form as AMCP also offers continuing medical education (CME) for its educational programs. This form is included in the AMCP Faculty Packet and maintained by AMCP's contracted ACCME accredited provider and AMCP. This three page form requires all faculty members, the AMCP Program Planning & Development Committee member, and AMCP Education staff to verify the disclosure of any potential financial conflicts of interest within the last 12 months, prior to the date of the CPE/CME activity being held.

These disclosures pertain to the following:

1. Faculty and/or their spouse who are an officer, director, partner, trustee, employee, advisory board member of any pharmaceutical manufacturer or medical device company
2. Faculty and/or their spouse are the owner, within the past 12 months, of any percent of voting stock or controlling interest of any pharmaceutical manufacturer or medical device company
3. Salaries and royalties from a commercial interest
4. Consulting fees from a commercial interest
5. Contracted research funds received directly from a commercial interest
6. Fees for non-CME services received directly from a commercial interest or their agents' (e.g., speakers' bureaus)

Additionally, these forms ask if the faculty and/or their spouse have derived income within the past 12 months from any pharmaceutical manufacturer or medical device company. The faculty must also disclose if non-FDA approved uses of pharmaceutical products or medical devices will be included in their presentation.

If the faculty member does disclose a relationship, he/she is asked to indicate the nature of the relationship. This relationship is disclosed to the attendees of AMCP national meetings in the *Final Program*, the conference guide distributed on site and by faculty prior to the start of their educational program. The statement preceding the disclosure statements in the *Final Program* reads:
The Academy of Managed Care Pharmacy (AMCP), an accredited provider of continuing pharmacy education by the American Council on Pharmacy Education (ACPE), is committed to providing the highest caliber of educational programming to its members and other interested parties. To help us meet our goal of providing high-quality independent programs at the [TITLE OF NATIONAL MEETING INSERTED HERE] and to help us satisfy the criteria set forth by our accrediting body, ACPE, AMCP requires that faculty members disclose the existence of any significant interest or other relationship with a manufacturer(s) of any commercial product(s) (i.e., pharmaceuticals, software, medical devices, and equipment) that may be discussed within presentations at an AMCP CPE event.

AMCP's CME provider, the (NAME OF PROVIDER INSERTED HERE), requires instructors, planners, managers and other individuals who are in a position to control the content of this activity to disclose any real or apparent conflict of interest they may have as related to the content of this activity. All identified conflicts of interest are thoroughly vetted by PIM for fair balance, scientific objectivity of studies mentioned in the materials or used as the basis for content, and appropriateness of patient care recommendations.

Finally, the Academy is very sensitive to perceptions of bias and has taken the following measures to monitor and avoid negative perceptions:

1. As a first line of defense, proposal reviewers assess all proposals against several criteria including the following: "Is this proposal promotional in nature?" If the proposal has a connotation of promotion, the proposal will be denied or will only be accepted upon investigation by the educational staff to resolve any pretense of promotion with the potential faculty.
2. Poster and satellite submissions are blinded for review. The submitting author is blinded for posters and the medical education company and pharmaceutical manufacturer are blinded for satellite symposia. Although these proposals are not accredited for CPE by AMCP, this blinding process is accomplished to avoid any conflict of interest with the reviewing committee.
3. All faculty members must complete the two COI forms.
4. During conversations with faculty leading up to the program, AMCP staff reinforces the importance of developing and delivering a presentation that is free of perceived bias or promotion. This is done throughout the planning process of all educational programs.
5. Before their presentation begins, all faculty must verbally state to the audience, "I have no financial conflict of interest to disclose" or "I have the following financial interest(s) to disclose..."
6. Topics that carry potential bias are balanced with multiple perspectives and users.
7. Session moderators staff each session. Moderators are AMCP members who are carefully selected to serve the role. AMCP also posts staff monitors who are instructed to monitor for perceptions of bias and relay any such feedback directly to the CE administrator.
8. Members of the AMCP Program Planning & Development Committee talk with meeting attendees to assess any feelings of bias or promotion. This feedback allows us to discuss with faculty any constructive criticism.
9. A thorough review of program evaluations is conducted to specifically address the issue of perception of bias.

AMCP'S MISSION STATEMENT OF QUALITY EDUCATION

The Academy of Managed Care Pharmacy (AMCP) strives for the highest possible standards in its continuing educational resources and programs. AMCP endeavors to offer timely, practical, innovative, and visionary educational opportunities so that individuals will be knowledgeable in managed care pharmacy practices, equipped with the tools necessary for effective and informed decision making, and recognized as an integral member of the patient care delivery team.

GUIDING PRINCIPLES

- **Excellence:** AMCP believes that excellence in continuing education is fundamental to the success of quality pharmaceutical care delivery, essential to the continued growth of the managed care pharmacist, and central to the assurance of appropriate health care outcomes for all individuals.
- **Fair Balance:** AMCP maximizes fair balance in its continuing educational programs with the sole purpose of providing multiple perspectives from which its members can form professional opinions and become valuable resources for on-going health care reform.
- **Confidence:** AMCP aspires to obtain the respect of all pharmacists, faculty members, students, and other health care professionals by constantly improving its continuing educational programs, by providing the best educational services available, and by maintaining a professional and positive learning environment.
- **Value:** AMCP strives to make high quality, accessible, and affordable continuing education programs a top priority.
- **Collaboration and Cooperation:** AMCP believes that a collaborative learning environment encourages communication among colleagues and contributes to the fulfillment of professional and personal educational goals. To this end, AMCP seeks ways to foster interaction among its members and others by optimizing opportunities for sharing ideas and exchanging valuable clinical and operational knowledge.
- **Responsibility:** AMCP accepts its responsibility to contribute not only to the on-going learning of pharmacists practicing in managed care environments, but to the enrichment and advancement of the pharmacy profession. Through a commitment to offering excellent continuing educational programs, it is AMCP's goal to help its members exceed the expectations of those they serve.
- **Leadership:** By occupying a position of unique leadership in continuing education, AMCP members and all others who participate in its educational programs will meet new challenges with creative solutions, face new questions with in-depth knowledge, and embrace new opportunities with unbridled and open-minded enthusiasm.