

The American Society of Breast Surgeons
CME Activity Disclosure Process for
Financial or Non-financial/Strategic Business Relationships or Partnerships

Since healthcare professionals serve as the trusted authorities when advising patients, they must protect their learning environment from industry influence to ensure they remain true to their ethical commitments. Many healthcare professionals have financial or non-financial/strategic business relationships or partnerships (relationships) with ACCME-defined ineligible companies. These relationships must not be allowed to influence the educational content of a CME activity. As an ACCME accredited provider, ASBrS is responsible for identifying ***relevant financial relationships*** between individuals in control of educational content of a CME activity and ineligible companies and managing these to ensure they do not introduce commercial bias into the education.

Disclosure of All Financial or Non-financial/Strategic Business Relationships or Partnerships

As an ACCME accredited provider, the Society requires individuals in a position to control educational content of a CME activity (including but not limited to, course/program chairs, moderators, faculty, authors, content reviewers, editors, planning committees, and ASBrS staff) to complete an ASBrS 'Financial or Non-financial/Strategic Business Relationships or Partnerships Disclosure Form' (disclosure form).

The form asks individuals to disclose all financial, or non-financial/strategic, business relationships or partnerships (relationships) with any ineligible company they have had over the past 24 months. We ask individuals to disclose all relationships regardless of whether they view the relationships as relevant to the CME activity.

The individual must complete a disclosure form at the time they are invited to participate in a CME activity. Participation will not be confirmed without the completion of the disclosure form and will be contingent upon mitigation, if necessary. Owners or employees of ineligible companies are excluded from controlling content or participating as planners or faculty in a CME activity. However, there are some exceptions to this exclusion.

Mitigation of Relevant Financial or Non-Financial Relationships or Partnerships

A designated activity (Planner, Chair, Moderator) or CME official (CME Committee member) will review the disclosed relationships to determine whether the relationships are relevant to the CME activity. Financial relationships of any dollar amount or non-financial/strategic business relationships or partnerships are defined as relevant if the educational content is related to the business lines or products of the ineligible company.

Should it be determined that a relevant relationship exists, the individual will be contacted with methods to mitigate the relationship. The designated official will use an 'Mitigation of Disclosed Relationship(s)' form to detail how the relevant relationship was mitigated. The mitigation form can only be completed by the designated official. *Please note:* the identification of relevant relationships does not necessarily mean that you are unable to participate in the planning and implementation of the CME activity. Rather, the accreditation standards require that relevant relationships are mitigated before you assume your role in this activity.

The designated official may mitigate relevant relationships by reviewing an individual's slides prior to presentation to ensure the absence of commercial bias or industry influence. If necessary, content may be restructured. If there is no physical content to be reviewed, the CME committee will determine how topics and speakers were determined and obtain evidence that the topics represent a balanced, evidence-based approach.

An advanced conflict mitigation process will be initiated if the designated official determines a relevant relationship requires additional review. The *CME committee* will determine the applicable parties for additional review

If the relevant relationship cannot be mitigated, the designated official will recommend two replacements for the individual, and the Society will rescind the original invitation to participate in the CME activity.

A designated official with relevant relationships cannot mitigate other individuals with similar relevant relationships. The CME committee will mitigate these relevant relationships.

All relevant relationships must be mitigated before the start of the CME activity. The CME Committee gives final review and approval of all 'Mitigation of Disclosed Relationship(s)' forms.

Communicating Disclosures to Learners

Disclosure information of the individuals in a position to control educational content of a CME activity must be provided to learners before the start of the activity. Information is provided through online postings, presentation slides, handouts and/or verbal communication by the individual, moderator, and/or applicable program or committee chair. The information includes the presence or absence of relevant relationships with ACCME-defined ineligible companies as well as how the relevant relationships were mitigated by designated activity or CME officials.

Non-Compliance Process

The non-compliance process is initiated when an individual's (in a position to control educational content of the CME activity) *undisclosed* relationship(s) with an ineligible company is identified or reported during or after the CME activity.

The Board of Directors, CME Committee, Ethics Committee, and applicable committee chair(s) will discuss the act of noncompliance and agree upon a resolution. The offending individual will be: 1) notified of their act of non-compliance and resolution and 2) then asked to review, sign, and adhere to it.

Possible resolutions include, but are not limited to:

- Withdrawal of future invitation to participate in ASBrS educational activities for one to three years as determined by the CME and Ethics committee

Oversight

The CME Committee and Ethics Committees ensure that there is no commercial bias or industry influence in ASBrS CME activities. They work together to ensure proper mitigation of relevant relationships. Members of these committees serve as additional oversight, participating and observing ASBrS CME activities to look for any evidence of bias and ensure compliance with the ASBrS policies.

Reporting Commercial Bias or Industry Influence

Participants of any ASBrS CME activity may report any improprieties on the applicable evaluation form and to the CME and Ethics Committee at cme@breastsurgeons.org.