

American Geriatrics Society Continuing Medical Education

AGS IMPLEMENTATION PROCEDURES FOR IDENTIFYING AND RESOLVING CONFLICTS OF INTEREST

The American Geriatrics Society is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians. The Professional Education Executive Committee (PEEC) has developed the following implementation procedures to guide the planning process and ensure the quality of each AGS educational activity. The PEEC referenced the overarching **AGS Guidelines for Corporate Relationships** (there would be a link to this) when developing these implementation procedures. These policies comply with the ACCME Essential Areas and Elements, including the 2004 Updated Standards for Commercial Support.

Continuing Professional Education Mission and Goals Statement

The American Geriatrics Society (AGS) is a nationwide not-for-profit association of geriatrics health care professionals, research scientists, and other concerned individuals dedicated to improving the health, independence, and quality of life of all older people. The Society, through its Continuing Professional Education Program, seeks to increase the geriatrics expertise of health care professionals who care for older adults by providing high quality educational programs that address topics that are integral to the care of older adults. To read the AGS CPE Mission and Goals Statement in full, please click **here**.

Educational Planning

The PEEC has delegated the responsibility for planning educational programming to the planning group that is responsible for that program. The PEEC oversees the work of these groups by reviewing their work at its bi-annual meetings and providing feedback to each group on how to improve its processes and develop content. In general, each group follows these steps when planning CME programs:

1. consideration of needs assessment data (evaluation of past events, participant requests, emerging data, expert opinion)
2. identification of the desired outcome (e.g., provide information on trends in Geriatrics, assist clinicians in preparing for board exams, improve training and research skills)
3. consideration of the scope of the program
 - for live programming, single/multiple sessions, type of space available, logistical arrangements, available resources, expected attendance
 - for enduring materials, dissemination strategies, available resources, target audience
4. identification of faculty best qualified to present chosen topics

5. identification of educational methods to be used in conducting the activity based on desired outcome, anticipated attendance, available facilities, and subject matter at hand (e.g., lecture, case-based, small group)
6. development of learning objectives
7. for live programming with multiple sessions, schedule development
8. development of programmatic materials
9. development of an evaluation plan

Independence of Decision-Making for all Steps of the Educational Process

The AGS ensures that the following decisions are made free of the control of a commercial interest. The ACCME defines a "commercial interest" as any proprietary entity producing health care goods or services, with the exemption of non-profit or government organizations and non-health care related companies.

- (a) Identification of CME Needs;
- (b) Determination of educational objectives;
- (c) Selection and presentation of content;
- (d) Selection of all persons and organizations that will be in a position to control the content of the CME;
- (e) Selection of educational methods;
- (f) Evaluation of the activity.

The AGS CME department supports this policy by ensuring that all content development is free from commercial bias. The planning process for educational activities is the responsibility of the specific Planning Committee which is selected by the AGS, and is overseen by the Professional Education Executive Committee. All decision making lies with the AGS planning committees including the following processes:

- (a) Identification of needs;
- (b) Selection of faculty;
- (c) Selection of Course Chair/Planning Committee
- (d) Selection of Objectives and Content
- (e) Selection of Methods and Evaluation

A commercial interest may provide input if the planning committee requests it, but all decision making ultimately lies with the AGS. A commercial interest cannot take the role of non-accredited partner in a joint sponsorship relationship.

Disclosure by all Individuals who can Influence Content

The American Geriatric Society strives to ensure that the information presented in its educational activities is balanced and fair and is not distorted by bias or influence. To this end, we require all planners, authors, presenters, and anyone else who is in a position to control the content of an education activity to complete a disclosure statement detailing all relevant financial relationships that may produce or may be perceived to produce a

conflict of interest. The ACCME defines “relevant” as financial relationships in any amount occurring within the 12-month period preceding the time that the individual is being asked to assume a role controlling content of the CME activity. In keeping with ACCME Guidelines, if a planner, author or faculty member refuses to disclose relevant financial relationships, he/she will be disqualified from being a part of the planning and implementation of the CME activity.

Relevant Financial Relationships

All planners, authors and presenters, and anyone else who is in a position to control the content of an AGS education activity are required to disclose their own and their spouse/partner’s financial interest or other relationship:

1. with the manufacturer(s) of any commercial product(s) and/or provider(s) of commercial services; and
2. with any commercial supporter(s), and
3. when a financial relationship exists, the nature of the relationship. (The financial interest and/or relationship might include such things as grants or research support, employee, consultant, significant shareholder, etc.)

Disclosure to Learners

All faculty disclosures are shared with learners prior to the start of the educational activity, and include the following:

- (a) The name of the individual;
- (b) The name of the commercial interest(s);
- (c) The nature of the relationship the person has with each commercial interest

For an individual with no relevant financial relationships the learners are informed that no relevant financial relationships exist.

Disclosure of Commercial Support for the CME Activity

The AGS discloses to learners the source of all support from commercial interests. This disclosure occurs prior to the start of the educational activity.

Individuals Who Refuse to Disclose.

In accordance with the ACCME policy, an individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, a teacher, or an author of CME, and cannot have control of, or responsibility for, the development, management, presentation or evaluation of the CME activity. A refusal to disclose will automatically disqualify an individual from participation in the activity.

Resolution of Conflict of Interest (COI)

The American Geriatrics Society (AGS) was reaccredited with commendation by the Accreditation Council for Continuing Medical Education (ACCME) in 2004, and we are

accredited through 2010. We continuously strive to ensure that the education activities planned and conducted by our faculty meet generally accepted ethical standards as codified by the ACCME, the Food and Drug Administration, and the American Medical Association's Guide for Gifts to Physicians.

To this end, the American Geriatrics Society's Professional Education Executive Committee has developed the following policy on Resolution of Conflicts of Interest. This policy provides a framework to address conflict-of-interest issues as they arise, and is based on our interpretation of the 2004 Updated ACCME Standards for Commercial Support.

Under this policy, everyone who is in a position to control the content of an education activity has disclosed to us all relevant financial relationships with any commercial interest and under which we work to resolve conflicts of interest. A commercial interest is defined by ACCME as a proprietary entity producing health care goods or services, with the exemption of non-profit or government organizations and non-health care related companies.

Resolution of Conflicts of Interest

Should the AGS determine that a conflict of interest exists as a result of a financial relationship a planner, author or presenter or their spouse/partner may have, the AGS will resolve the conflict prior to offering the activity. ACCME has defined circumstances that create a conflict of interest as being those that occur 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.

Each faculty member's conflict of interest will be resolved on an individual basis. Some examples of how the AGS may resolve conflicts of interest by altering control over content include but are not limited to the following:

- Ask planners, authors or faculty members to divest themselves of the relationship that is producing the conflict of interest.
- Peer review content before presentation or publication.
- Require that recommendations for clinical care be based on the best available published evidence or best practice guidelines.
- If a proposed faculty member has a conflict of interest related to the content, choosing another faculty member who does not have a relationship to the commercial interests related to the content.
- Changing the focus of the CME activity so that the content is not about products or services of the commercial interest that is the basis of the conflict of interest.

- Changing the role of a person with a conflict of interest within the activity so that it is no longer about products or services of the commercial interest. For example, an individual with a conflict of interest regarding products for treatment of a condition could address the pathophysiology or diagnosis of the condition, rather than therapeutics.
- Limiting the content to a report without recommendations. If an individual has been funded by a commercial 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.
- Limiting the sources for recommendations. Rather than having a person with a conflict of interest present personal recommendations or personally select the evidence to be presented, we would limit the role of the person to reporting recommendations based on formal structured reviews of the literature with the inclusion and exclusion criteria stated ('evidence-based').

Faculty Notification

Planners, authors and presenters are notified in writing of the AGS policies on Disclosure and Resolution of Conflicts of Interest and the basis of this policy in the ACCME guidelines.

Review of Promotional and Programmatic Materials

The Society requires that all promotional and programmatic materials be submitted to us for review. Promotional materials are reviewed by at least two staff members to insure that these are in compliance with our policies and procedures that rest upon ACCME guidelines for Commercial Support. Programmatic materials are also reviewed by the Program Committee member (or their designee) responsible for a specific symposium and requested changes and comments must be addressed before a program is offered at the meeting. Program Committee members review program materials for fairness and objectivity. They will look specifically for any introduction of bias in favor of any one product or therapeutic option over another. Use of generic names contribute to this impartiality. If trade names are used, those of several companies are used rather than only that of the single supporting company.

Industry Support of Educational Activities

The AGS complies with the ACCME 2004 Updated Standards for Commercial Support of Continuing Medical Education. When there is commercial support for an educational activity, the role of the commercial supporter to facilitate conduct of the activity by providing funding to support an activity. AGS is responsible for the content quality and scientific integrity of all CME activities approved for credit. The following implementation strategies are followed:

Letters of Agreement

The AGS requires execution of a letter of agreement between the Society and the Commercial Supporter. In instances where there is a third party vendor engaged to help

implement the program, the Society executes a letter of agreement with the Organizer of the Program as well.

Budget & Fund Management

A budget is developed for each commercially supported activity. For activities where the Society is working with a medical communications company, the budget is attached to and becomes a part of the letter of agreement. For programs where support is provided directly to the Society, internal budgets are developed by staff. We require submission of an expense report from third party vendors following upon completion of the activity. Commercial financial support may be used for a) honoraria for program faculty (amount decided by AGS), b) travel, lodging, meals for program faculty, c) meals, refreshments and receptions provided for program registrants and faculty, and d) program expenses including, facility rental, supplies, equipment. Commercial supporter may not pay directly for CME activity expenses (i.e. speaker's travel, honoraria, faculty dinner, etc.) – all payments must be handled by the AGS.

Control of Content

It is a requirement of partnering with the Society that we maintain control of the content of a program. We ensure adequate controls by requiring that AGS members be responsible for oversight of content development. We ask leaders of all educational programs to complete a compliance form indicating that they have read and understand the ACCME Essential Areas and Standards for Commercial Support. Commercial supporter representatives do not have a role in the following areas of a CME activity a) planning program content, b) selection of program speakers, and c) promotion of products during presentation.

Promotion Separated from Education

The Society requires separation of promotional activities from educational activities. Specific examples of how this requirement is implemented include: (1) we do not provide continuing medical education credits for our poster sessions as these take place in the Exhibit Hall; (2) we do not allow advertising in journal supplements that carry CME; (3) corporate linkages on our web site must be at least two clicks away from our site and are not allowed on web pages that are related to educational programming; and (4) we do not allow promotional activities within the obligate pathway to an educational event.

Acknowledgement of Support

The AGS acknowledges support in promotional and program material as follows: “This program is supported by an educational grant from XYZ Corporation.” We do not include logos in our acknowledgements.

Examples

Staff work with the individual planning committees to determine the best approach to resolving conflicts of interest for the work of that group. Some examples follow:

AGS Annual Meeting

For the 2006 Annual Meeting Program Committee in July, staff reviewed Program Committee members disclosure forms and then assigned program committee members to

sub-committees where they had no conflict of interest with the proposals received. Program Committee members who had a conflict of interest with any proposed program recused themselves from the discussion. For accepted sessions, staff worked with Moderators and the Program Committee member assigned to that session on any modifications to the topic or presenter that needed to be made because of an existing conflict of interest for a faculty member or moderator.

We instituted a new requirement for moderators in terms of conflicts of interest, charging moderators with resolving any conflicts of interest that exist as a result of any financial relationships speakers on their session have. Moderators who have a conflicts of interest related to the subject matter covered in the symposium they are moderating are assigned a “content moderator” who has no conflicts of interest related to the subject matter of the symposium and who is charged with overseeing all speaker presentations and handouts to ensure that they are well-rounded and free from bias.

Geriatrics Review Syllabus

For the *Geriatrics Review Syllabus* faculty conflicts of interest were resolved by having the content independently peer reviewed before publication by the Editorial Board and Question Review Committee. Six of the editors reviewed all the chapters and four editors reviewed all the questions during the editorial review process. Consulting editors reviewed all the content for pharmacotherapy and ethnogeriatrics. Additionally the editorial board and question review committee each met twice during the editorial process to review entire content and discuss all the material together as a group.

Other Educational Programs

Webcasts

Annual meeting symposia that are web-cast via the AGS website for CME credit go thru the same procedures as outlined for the annual meeting above.

Journal CME

Supplements to *JAGS*, *Annals of Long-term Care*, and *Clinical Geriatrics* extend the reach of annual meeting symposia. These supplements are based on annual meeting symposia, which go thru the same procedures as outlined above. In addition, the supplement is reviewed by a Program Committee member and a Content Expert, both of who have no conflicts of interest related to the subject matter covered in the supplement, to ensure that the material is well-rounded and free from bias.

Jointly Sponsored Activities

This section is currently under construction – please check back soon.

Continuing Nursing Education

The American Geriatrics Society has been approved by the California Board of Registered Nursing (Provider No. CEP 10299) to provide continuing education.

For the AGS annual scientific meeting, the AGS also applies for nursing contact hours from the New York State Nurses Association (NYSNA). NYSNA is an accredited approver of nursing continuing education by the American Nurses Credentialing Center (ANCC). NYSNA approval of an educational activity ensures participants the program meets professional standards for continuing nursing education

Continuing Pharmacy Education Credit

For the AGS annual scientific meeting, the AGS also applies for pharmacy contact hours from the American Society of Consultant Pharmacists (ASCP). ASCP is accredited by the Accreditation Council for Pharmacy Education as a provider of continuing pharmacy education.