Name of Policy:	College of Medicine & Life Sciences: Conflict of Interest and Disclosure (CME)
Policy Number:	3364-81-12-206-04
Approving Officer:	Dean, College of Medicine & Life Sciences
Responsible Agent:	Associate Dean for Continuing Medical Education
Scope:	All UT faculty, staff, students and joint sponsors

Revision date: 10/14/2026

Original effective date: 10/1/2009

☐	New policy proposal	☐	Minor/technical revision of existing policy
☒	Major revision of existing policy	☐	Reaffirmation of existing policy

(A) Policy statement

Specific planning processes and organizational criteria must be followed to identify and resolve all conflicts of interest for a continuing medical education (CME) activity approved for AMA PRA Category 1 credit.

(B) Purpose of policy

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To ensure compliance with the ACCME Standards for Integrity and Independence in Accredited Continuing Education, the University of Toledo Office of Continuing Medical Education (UT-CME) is committed to maintaining the integrity, independence, balance, and scientific rigor of all certified educational activities. In support of this commitment, UT-CME requires that all content and associated materials be free from the control or influence of ineligible companies (formerly known as commercial interests).

To promote transparency and mitigate potential bias, all individuals in a position to control the content of a CME activity must disclose any relevant financial relationships with ineligible companies that occurred within the 24 months preceding the activity.

(C) Procedure

1. **Independence from Commercial Influence**
   All aspects of CME activities designated for AMA PRA Category 1 Credit™ must be developed and implemented free from the control or influence of ineligible (proprietary) companies. This includes the planning, design, delivery, and evaluation of the activity. The following criteria must be upheld to ensure content integrity:

   a) Recommendations related to clinical care must be based on evidence that is generally accepted within the medical community.

b) Presentations must offer a balanced and objective view of all reasonable therapeutic options.
c) Scientific research referenced to support patient care recommendations must adhere to widely accepted standards of study design, data collection, and analysis.
d) Faculty should use generic names to support impartiality in the discussion of therapeutic options.
e) If trade names are used, the presenter must refer to products from multiple companies rather than highlighting those of a single manufacturer or supporter.
f) When discussing off-label use of a commercial product or investigational agents not yet approved by the FDA, faculty must clearly disclose that the product is either not approved for the discussed use or is still investigational.

2. Disclosure of Financial Relationships

All individuals in a position to control the content of a CME activity are required to complete a University of Toledo CME Disclosure Form at the time of submitting the CME credit application. This includes course directors, faculty, content developers, planners, and reviewers.

a) Disclosure must include: the individual's name, the name(s) of ineligible company(ies), and the nature of the financial relationship(s).
b) If no relevant financial relationships exist, learners must be informed that the individual has nothing to disclose.
c) All relevant disclosures must be communicated to learners **prior to the start** of the educational activity.

3. Review and Conflict Mitigation

Disclosure forms will be reviewed by a designated CME committee member or the activity director to determine if any disclosed financial relationships are relevant to the content and could pose a conflict of interest.

(a) If a conflict is identified, it must be resolved in accordance with ACCME's procedures for mitigation prior to the individual's participation in the activity.
(b) Planning committees are expected to follow the ACCME's standard procedural flow chart for identifying and resolving conflicts of interest.

Approved by: **/s/**_____ Imran Ali, M.D. Dean, College of Medicine & Life Sciences 10/14/26_____ Date *Review/Revision Completed by:* *CME Advisory Committee* *Associate Dean for Continuing Medical Education*	**Policies Superseded by This Policy:** • *A-10-12-00004-0206 Guidelines for disclosure (former Health Science Campus CME policy, previously updated December 2005)* • *A-10-12-00005-0206 Conflict of interest (former Health Science Campus CME policy, previously updated December 2005)* • *A-10-12-00006-0206 Product Discussion and Research Reporting/Research Reporting at CME Activities (former Health Science Campus CME policy, previously updated December 2005)* Initial effective date: 6/1/05 Review/Revision Date: • 10/1/09 • 08/06/12 • 04/13/15 • 09/15/15 • 02/12/19 • 6/8/22 • 06/08/25 • 10/14/26 Next review date: **10/15/2026**