Flowchart for the Identification and Resolution of Personal Conflicts of Interest  
Meeting the Expectations of ACCME’s Criterion 7  
(Last updated: February 1, 2017)

Use this flowchart at the beginning of your planning process for CME activities to ensure independence from ACCME-defined commercial interests. **Start at A below.** For step-by-step instructions for using this flowchart, visit [www.accme.org/coiflowchart](http://www.accme.org/coiflowchart).

### A

Is the content related to products or business lines of an ACCME-defined commercial interest?

- **Yes**
  - For each person in control of content for the CME activity...

- **No**

### B

Is the person an employee/owner of an ACCME-defined commercial interest?  
**(SCS 1)**

- **Yes**

Employees of ACCME-defined commercial interests can have **no role** in the planning or implementation of CME activities related to their products/services.

- **No**

### C

Does the person have a relevant financial relationship with an ACCME-defined commercial interest?  
**(SCS 2.1)**

- **Yes**

Is there a relevant financial relationship? If you can check all 4 boxes below, you’ve identified a relevant financial relationship with an ACCME-defined commercial interest that must be resolved before the activity occurs:

- [ ] Financial relationship between person in control of content (or their spouse/partner) and an ACCME-defined commercial interest
- [ ] Any amount ($)
- [ ] In the past 12 months
- [ ] Products/services of the ACCME-defined commercial interest (with which they have the financial relationship) are related to the content of the CME activity

### D

**Yes,** there is a **relevant financial relationship.**

Provider takes an active role to resolve conflicts by:

- recusing person from controlling aspects of planning and content with which they have a conflict of interest and/or
- using peer-review of planning decisions (for planners) by person(s) that do not have conflicts of interest related to the content and/or
- using peer-review of content (for authors/presenters) by person(s) that do not have conflicts of interest related to the content and/or
- making sure to ensure that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines) and/or
- using other methods that meet ACCME’s expectations

**Implementation**

Implement your process to resolve the potential conflict-of-interest arising from their relevant financial relationship.

**(SCS 2.3)**

- **Done!**

### Disclosure to Learners

Before the activity, disclose to learners that there are no relevant financial relationships with ACCME-defined commercial interests for anyone who was in control of the content of the activity.  
**(SCS 6.2)**

- **Done!**

**Disclosure to Learners**

Before the activity, disclose to learners that the person(s) have no relevant financial relationship(s) with ACCME-defined commercial interests to disclose.  
**(SCS 6.2)**

- **Done!**

**Disclosure to Learners**

Before the activity, disclose to learners the name(s) of the individual(s), name of the ACCME-defined commercial interest with which they have a relevant financial relationship(s) and the nature of the relationship.  
**(SCS 6.4)**

- **Done!**

**Footnotes**

1. The use of employees of ACCME-defined commercial interests as faculty and planners or in other roles where they are in a position to control the content of accredited CME is prohibited, except in specific situations. For more information, visit [this Ask ACCME frequently-asked-question](http://www.accme.org/coiflowchart) regarding commercial employees.

2. There are a range of approaches providers can use to resolve potential conflicts of interests. For more information, visit ACCME’s **Provider Examples of Compliance and Noncompliance** for Criterion 7 on [www.accme.org](http://www.accme.org).