

## Operating Policy and Procedure

Director for Continuing Medical Education in the Office of the Dean, Texas Tech University Health Sciences Center, El Paso, Texas

Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Governmental agencies and providers of direct patient care services are not considered to be ineligible companies.

### Procedures

1. Everyone in a position to control the content of an accredited continuing education activity will disclose all financial relationships with any ineligible companies (including name of the ineligible companies and nature of the relationship) using the Disclosure Statement form provided by the Office of CME.
  - a. The Office of CME maintains disclosures on a fiscal year basis. Those who control content (planners/presenters) should disclose any relationships that have occurred within the past 24 months that may be applicable from September 1 through August 31. In the event of a change in relationship status, those who control content must notify the TTUHSC Office of CME for his/her activity and complete an updated disclosure statement.
  - b. Any individual who refuses to disclose all financial relationships will be disqualified from being a planning committee member, teacher, or an author, and cannot have control of or responsibility for the development, management, presentation or evaluation of the accredited continuing education activity.
2. The Office of CME will review the disclosed relationships and exclude owners and employees of ineligible companies from participating as planners, faculty, or other roles unless the educational activity meets one of the expectations that ACCME has listed. Please reference ACCME Standards for Integrity and Independence in Accredited Continuing Education standard 3.2.
3. The Office of CME will determine which financial relationships are relevant to the content of the continuing educational activity, mitigate those relevant financial relationships to prevent commercial bias, and disclose the presence or absence of all relevant financial relationships to learners prior to the activity.

Financial relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.



When TTUHSC serves as a source of information for the self-directed learner, learners will be directed to resources and methods for learning that are not controlled by ineligible companies.