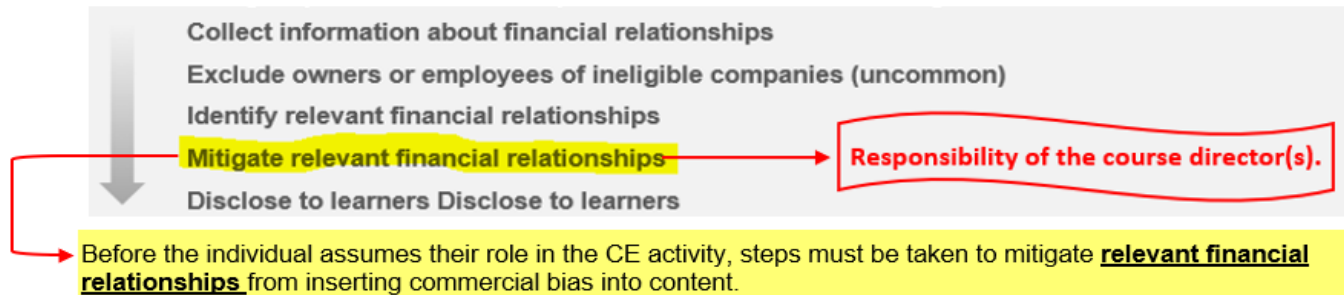


To comply with accreditation guidelines, the following steps must be followed to mitigate all relevant financial relationships between individuals in control of content and **ineligible companies** prior to an individual assuming their role in the accredited CE.



Who is responsible for mitigation?

Generally, mitigation is the responsibility of a course director (or designee) or a member of the planning committee with no relevant relationships.

What if a course director has relevant relationships?

If a course director has relevant relationships, these relationships should be mitigated by a co-course director with no relevant relationships or member of the planning committee/designee with no relevant relationships. Alternatively, the mitigation can be delegated to CCEHS.

How is mitigation documented?

Mitigation must be documented on the CCEHS Management of COI Grid, http://cce.upmc.com/COI_grid. The grid must be reviewed and approved by CCEHS prior to an individual assuming their role in the accredited CE.

What are mitigation strategies?

Mitigation strategies are approaches implemented to reduce or eliminate any opportunity for commercial bias influencing the content of the CE activity. The following mitigation strategies may be implemented depending on the individual's role in the CE activity.

➤ Mitigation of planning Committee (multiple may be used):

- The content of the presentation is non-clinical (e.g., leadership, communication skills, etc.)
- End the financial relationship (including having ended the relationship within 24 months).
- Recuse individual from controlling aspects of planning with which there is a financial relationship.
- Peer review planning decisions and determinations by persons without relevant financial relationships.

➤ Mitigation of faculty/teachers/presenters, authors (multiple may be used):

- The content of the presentation is non-clinical (e.g., leadership, communication skills, etc.)
- End the financial relationship (including having ended the relationship within 24 months).
- Recuse individual from controlling aspects of content with which there is a financial relationship.
- Peer review of content by persons without relevant financial relationships, http://cce.upmc.com/COI_peer_review.
- (**most common**) Attest that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines).

Note: Individuals who own stock (not through a mutual fund or pension plan) in privately held ineligible companies are considered **owners or employees and therefore must be excluded from planning or implementation of the education.**

Additional Resources:

- Standards for Integrity and Independence in Accredited Continuing Education, <https://accme.org/standards>
- Conflict of Interest Disclosure Form, http://cce.upmc.com/COI_Disclosure
- Management of Conflict of Interest (COI) Process for CE Planners, http://cce.upmc.com/COI_Process
- Mitigation of Relevant Conflict of Interest, http://cce.upmc.com/COI_Mitigation
- COI FAQ for Faculty, http://cce.upmc.com/COI_FAQ
- Peer review form, http://cce.upmc.com/COI_PeerReview
- Management of COI Grid, http://cce.upmc.com/COI_grid
- Email ccehssupport@upmc.edu