

American Association for Cancer Research Policy for Identification and Mitigation of Relevant Financial Relationships of Planners, Faculty and Others

Purpose: This policy outlines the procedures that the American Association for Cancer Research (AACR) uses to ensure independence from ineligible companies and to identify, mitigate, and disclose conflicts of interest of the faculty, authors, planners, staff, and others involved in its accredited continuing education (CE) activities. As an ACCME provider in accordance with the Standards for Integrity and Independence, it is the AACR's policy to ensure educational content is fair, and balanced and that any clinical content presented supports safe, effective patient care.

The following steps are taken for ensuring clinical content is valid:

STEP 1: Collect information from all planners, faculty, and others who would be in positions to control content. Ask them to provide information about **all** their financial relationships with ineligible companies over the previous **24 months**. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies.

Anyone refusing to disclose will not be permitted to participate in the activity.

STEP 2: 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 exceptions listed below. There are only three exceptions that allow for owners and/or employees of ineligible companies to participate as planners or faculty in accredited continuing education.

1. When the content of the activity is not related to the business lines or products of their employer/company.
2. When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations.
3. When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.

STEP 3: Determine which financial relationships are **relevant** to the content of the continuing education 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.

Identify and mitigate relevant financial relationships that you have identified for planners, faculty, and others who will control educational content for your education activity. AACR will make sure that (1) the mitigation strategy is appropriate to the person's role in the activity, and (2) that mitigation is implemented before each person takes on their role.

The following steps are taken:

STEP 1: Review collected information about financial relationships and **exclude owners or employees of ineligible companies** from participating as planners or faculty unless their participation meets one of the permitted exceptions. After collecting all financial relationships from prospective planners, faculty, and others, exclude any persons who are owners or employees of ineligible companies. Ineligible companies are those whose primary business is producing, marketing, selling, reselling, or distributing healthcare.

Employees of ineligible companies may participate only with one of the three exceptions. AACR requests attestation of eligible content.

STEP 2: Determine relevant financial relationships.

- A financial relationship, in **any amount**, exists between the person in control of content and an ineligible company.
- The content of the education is related to the products of an ineligible company with whom the person has a financial relationship.
- The financial relationship existed during the past **24 months**.

Review the information for all persons whom you did not exclude in Step 1 and determine whether each person's financial relationships with ineligible companies are relevant to the content of the education you are planning. Financial relationships are relevant if the following three conditions are met for the prospective person who will control content of the education.

STEP 3: Choose a mitigation strategy for each person who has a relevant financial relationship and **implement** that strategy before the person assumes their role.

Mitigation steps for planners (*choose at least one*)

- ✓ **Divest** the financial relationship
- ✓ **Recusal** from controlling aspects of planning and content with which there is a financial relationship
- ✓ **Peer review** of planning decisions by persons without relevant financial relationships
- ✓ Use **other methods** (*please describe*):

Mitigation steps for faculty and others (*choose at least one*)

- ✓ **Divest** the financial relationship
 - ✓ **Peer review** of content by persons without relevant financial relationships
 - ✓ Attest that clinical recommendations are **evidence-based** and **free of commercial bias** (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines)
 - ✓ Use **other methods** (*please describe*):
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Step 4: Document the mitigation strategy(ies) you used for each person with a relevant financial relationship.

Name of person	Roles	Steps taken to Mitigate	Date implemented

Full Disclosure to Participants Disclosing conflicts of interest:

AACR will include disclosure of conflicts of interest in activity materials for all faculty, authors, and planners and will require all speakers to disclose visually and verbally during live activities prior to the start of their individual presentations.

The disclosure information will include the following:

- The name of the individual
- The name of the ineligible company
- The nature of the relationship the individual has with each ineligible company.

AACR will also inform attendees if an individual has no relevant financial relationships with any ineligible companies.

Disclosure includes: *All the relevant financial relationships listed for these individuals have been mitigated.*