

AMERICAN SOCIETY OF HEMATOLOGY (ASH)
Principles, Policies, and Procedures related to
Conflict-of-Interest (COI)

EXECUTIVE SUMMARY

ASH's policies concerning the management of conflicts of interest involve all aspects of the Society – from committee meetings to annual meeting organization and speakers, its journal and other publications, and the development of clinical guidelines. As an ACCME-approved provider, ASH fully complies with the new continuing medical education rules regarding meeting program design and speaker disclosure. In addition, ASH has separated corporate sponsored symposia from the official ASH® annual meeting and now prohibits anyone who participates in a corporate program from being invited as an ASH speaker in the same year. ASH has put enforcement mechanisms in place to ensure that oral and poster presentations fully disclose COI and has increased the number of hematologists who formally review educational and special speaker presentations – as well as corporate sponsored symposia – to report bias or the appearance thereof. A centralized system tracks speakers who fail to comply with COI requirements; the system is being expanded to allow Web-based management of the process.

ASH has just taken the step of changing our policies to prohibit individuals with recent relevant financial conflicts from serving as a member of a clinical guideline writing committee. Although ASH is committed to this policy, there is concern about the feasibility of creating guidelines with these limits.

ASH policies apply generally to all types of conflicts, not just financial, and we find that institutional and personal ties are more often the basis of conflicts that must be managed in ASH committee meetings and study sections. This testimony, however, primarily discusses financial conflicts, as we understand that to be the focus of the Institute of Medicine study. The Society would be happy to provide any additional information desired concerning non-financial conflict-of-interest issues.

I. Principles

ASH's COI oversight involves eight principles and seven policies, set forth below:

Principle 1: The integrity of ASH, and the scientific, educational, and advocacy activities it undertakes, depends on the avoidance of bias arising from conflicts of interest, or from the appearance of such conflicts, by the individuals involved with those activities. Personal financial considerations must never be allowed to cloud physicians' and scientists' decisions on care of patients, safety of drugs or devices, or proper conduct of biomedical research. Continuing medical education (CME) provided to physicians by ASH must be free of bias devolving from financial arrangements or considerations.

Principle 2: A conflict of interest exists when individuals have material interests, regardless of value or dollar amount, outside ASH that could influence or could be perceived as influencing their decisions, actions, or presentations. Conflicts of commercial interest may involve either an agent or device as the subject in question or an agent or device that might be in competition with the subject in question.

Principle 3: The atmosphere ASH desires is one where people are comfortable asking questions [relating to COI] without feeling awkward or accusatorial, and where recusing oneself from participation in discussions that might be perceived as constituting a conflict is the norm rather than the exception.

Principle 4: That a member of ASH has outside interests is not an inherent conflict of interest. In fact, involvement in such interests may enhance the value of that member to the Society.

Principle 5: ASH subscribes to the view that research and development sponsored by the biomedical industry play an important role in biomedical research and that academic-industrial relationships have developed useful and life-saving products.

Principle 6: The mission of ASH does not include marketing of pharmaceutical or biomedical products. While opportunities do exist for purchase of space for commercial displays at the annual meeting and while *Blood* sells advertising pages, the revenues generated are devoted to the support of the Society's mission. To this end, strong firewalls have been designed to insulate ASH from inappropriate commercial influence.

Principle 7: ASH's policies are congruent with the positions of the Accreditation Council for Continuing Medical Education (ACCME) that state: (a) commercial support for CME must be acknowledged, (b) that no staff consultants in the interested company can be involved in the development of the CME activities and that (c) attendees be required to report on their perceptions of any possible bias (as cited in reference 4).

Principle 8: ASH agrees with the AAMC that the considerations of conflict-of-interest are relevant not only to clinical research and that they extend to all phases of biomedical research, including pre-clinical research. In pre-clinical research financial conflicts of interest are particularly apt to lead to bias if the work is "reasonably anticipated; (a) to be a component of an IND submission or (b) to progress to research involving human subjects within the coming 12 months."

II. Policies

The COI policies of ASH apply to all persons who:

1. Are employees or staff of ASH;
2. Seek to make presentations at any ASH meeting or to submit material for any ASH publication; or
3. Serve on the Executive Committee or other committees, or otherwise serve in an official service capacity on behalf of the Society.

Policy 1: Some individuals serve as expert witnesses, officers, directors, or members of scientific advisory boards of companies, participate in company sponsored speakers' bureaus, or accept subsidies for the costs of travel to the ASH annual meeting. All of these activities represent conflicts of interest. In such instances, ASH makes a rebuttable presumption of bias.

Policy 2: ASH holds its members to certain standards with regard to conflicts of interest. Specifically, when an ASH member has a conflict, s/he will not:

1. Take any action on behalf of ASH concerning the subject in conflict or any subject relevant to the subject in conflict;
2. Participate in discussions on the subject without full disclosure;
3. Participate in decision-making discussions or cast a vote;
4. Imply they are acting on behalf of ASH when discussing the relevant subject with third parties;
5. Fail to clarify with third parties with whom they deal on the relevant subject that they are not acting on behalf of the Society; or
6. Break laws relating to insider trading.

Policy 3: ASH has the right to take action regarding individuals who have exhibited biased behavior or action. These actions may include:

1. Requiring an individual to choose between the competing activities.
2. Prohibiting an individual from playing a decision-making role in ASH relevant to the conflict.
3. Prohibiting an individual from presenting at ASH-sponsored events.
4. Exclusion from publishing in *Blood* or other ASH publications.
5. Exclusion from participating in ASH committees.
6. Revocation of membership in ASH.

Policy 4: Grants from non-ASH entities: No donor, commercial or otherwise, can select speakers, awardees, or educational and/or scientific content.

Policy 5: Commercial Support for CME: (1) Commercial support for CME will be acknowledged. (2) No staff consultants of the interested company can be involved in the development of the content of CME of ASH. (3) Meeting attendees are provided with a formal opportunity to report on their perceptions of any possible bias in their review of the sessions for CME credit.

Policy 6: Exemptions: ASH considers exempt from its definition of reportable financial interests certain clearly defined types of academic consulting and fees, e.g. fees received for serving on grant application review groups (study sections) and fees given as honoraria (less than \$2,500 per event) by another academic institution for an academic activity, such as seminars and grand rounds.

Policy 7: Centralization of COI Information: ASH is developing a centralized, Web-based conflict-of-interest registry that will be fully online not later than 2010.

III. Discussion:

The following discussion amplifies ASH's principles and policies and indicates how these are applied and enforced in specific settings.

What Constitutes a Relevant Conflict of Interest?

ASH considers financial relationships of relevance to be those that have occurred in the past 12 months for the volunteer, partner, or spouse including: employment, consultancy, equity, research funding, honoraria, patents and royalties, speakers bureau involvement, advisory committee membership, board of directors membership, expert testimony, and financial support for the costs of travel to the ASH annual meeting.

ASH agrees generally with the definitions of financial interests in research outlined by the Association of American Medical Colleges (AAMC). Specifically, ASH agrees with the AAMC that the following do not represent significant financial interests: (a) Interests in publicly traded diversified mutual funds and (b) salary and other payments for services from the members institution. However, because corporate arrangements vary substantially from institution to institution and because institutional and investigator interest in a trial may be influenced by indirect costs provided to institutions conducting corporate sponsored clinical trials, ASH *does not agree* with the AAMC that "payments to the institution, or via the institution to the individual, that are directly related to reasonable costs incurred in the conduct of research as specified in the research agreement(s) between the sponsor and the institution," can always be excluded as significant financial interests (see reference 1, page 81).

How Does ASH Assure Dissemination of COI Information and the Avoidance of Bias at Scientific Meetings?

Monitoring and compliance measures are robust.

All posters selected for presentation must have a conflict-of-interest statement either attached to them or embedded within them. Convention staff in the poster hall examine each poster when the primary author enters the hall. If there is no COI statement, a form will be provided to the author to attach to the poster. Specific monitors have copies of the COI statements for each poster, and are assigned to ensure that COI statements remain in plain view on posters. If no COI statement is visible at any time, the monitors will place a completed statement on the poster. If the presenter or authors object, the poster will be removed from the board.

All speakers receive the message that a disclosure slide must be included in their presentations and they must state their conflicts prior to their presentation. Slide templates and samples are available on the ASH Web site. Central audiovisual (AV) personnel are instructed to screen all presentations to ensure that the required COI slide precedes each presentation. If the author has not included this slide, AV personnel will add it to the slide collection in collaboration with the author. No slide presentation will be delivered to the lecture room without this slide. AV personnel assigned to the lecture room are instructed to leave the COI slide on the screen long enough for the audience to review the information it contains, but no less than five (5) seconds, even for speakers who indicate that they have nothing to disclose. Chairs of educational and scientific sessions are instructed to ensure that the presenters state conflicts of interest or the lack of same. If the chair notes that the presentation reflected bias, s/he is required to make a statement to that effect immediately after the biased statement was made; the chair must also report the observation to the Committee on Educational Affairs, which maintains a database of speakers found to be non-compliant or reported to have exhibited bias. This information is reviewed and shared with those who plan all ASH meetings; once they are included on this list, these speakers are not invited to present at subsequent ASH events.

How Does ASH Identify Conflicts of Interest?

Speakers. Speakers, chairs, and formal participants at all ASH-sponsored sessions must complete conflict-of-interest forms in which the speakers disclose all relevant financial relationships. Speakers must also agree to disclose the nature of any discussion concerning off-label usage, that all research referred to in support of clinical recommendations will conform to generally accepted standards of experimental design, data collection and analysis, and that they will not promote a proprietary business interest or a commercial interest. They must reveal whether they have been trained or utilized by a commercial entity or its agent as a speaker and will agree to exclude any promotional aspects of such presentations from their ASH presentation. Those invited to chair and/or speak at the ASH annual meeting must also agree not to participate as a speaker in any corporate-sponsored session held on the Friday that precedes that ASH annual meeting.

Abstracts. All abstract submissions must be accompanied by a disclosure statement. Although the abstracts are blinded during the abstract review process, all author conflicts of interest are shared with the coordinating reviewer for use during the conference call that follows abstract scoring. The disclosures are also shared with the ASH Program Committee, which is charged with oversight of the entire abstract review process. The conflicts of all authors are printed alongside the abstract in the Program and Abstract Book.

The Society's Journal, *Blood*:

Blood policy follows the recommendations of the International Committee of Medical Journal Editors (ICMJE) and of the Council of Science Editors (White Paper on Promoting Integrity in Scientific Journal Publications).

Content. ASH, as the owner of *Blood*, is ultimately responsible for all aspects of publishing *Blood*, including its staff, budget, and business policies and decisions. *Blood* provides opportunities for commercial advertising. However, the editorial function of the journal is completely segregated from the advertising function; the Editor-in-Chief has full authority over the editorial and scientific content of *Blood*. ASH does not interfere in the evaluation, selection, or editing of individual articles, either directly or by creating an environment in which editorial decisions can be influenced.

Editors. All editors and associate editors sign a COI form each year.

Authors. COI disclosure policy for *Blood* contributors requires each author to disclose all relevant financial and other interests, regardless of amount or value that might be construed as resulting in an actual, potential, or apparent conflict in one's role as contributor to *Blood*. Actual or potential financial conflicts of interest may include one or more of the following: employment; consultancy within the past two years; ownership interests (including stock options) in a start-up company, the stock of which is not publicly traded; ownership interests (excluding indirect investments, such as mutual funds), including stock options in a start-up or publicly traded company; research funding; honoraria directly received from an entity; paid expert testimony within the past two years; royalties; and membership on another profit or non-profit entity's board of directors or its advisory committees.

The process involves the following: At the time of first submission, online, authors must disclose any conflicts of interest. At time of submission of revised manuscript, authors fill out a *Blood* copyright transfer and COI form: *Blood*'s copyright transfer and conflict-of-interest disclosure form is based conceptually on the *JAMA* form.

Reviewers. Invitations to reviewers contain: "by accepting this assignment he/she certifies that he/she has no conflict of interest, either financial or professional, and that they "understand the ASH-*Blood* COI policy <http://bloodjournal.hematologylibrary.org/authors/authorguide.dtl#conflict>."

Sponsors; restrictions on data access. The Society and its journal insist that principal investigators and authors have access to a copy of the original data and that the published work evolves from that access. The provision, by the company to the investigator, of summaries of such data is inadequate. *Blood* will publish work only if authors have full access to the primary data. Authors are required to expressly certify that they have had access to all primary data related to clinical trials.

The Editor-in-Chief evaluates allegations or instances of conflict-of-interest impropriety on the part of *Blood* editors, reviewers and authors. In so doing, the assistance of Publishing staff and lawyers representing ASH may be sought. Instances of documented impropriety may lead to sanctions, including but not limited to dismissal of an editor, barring an author from future *Blood* submissions and reporting of infractions to the authors' institutions and to the *Blood* readership at large. There is no definite period of time that an author in violation of COI policy is banned from submitting to *Blood*. Ethical breaches and improprieties are dealt with on a case by case basis.

The Hematologist:

ASH's newsletter, *The Hematologist*, requires all editors and authors to disclose conflicts of interest. Each article in *The Hematologist* is accompanied by a statement that discloses the author's conflicts of interest. The Editor-in-Chief is responsible for assuring that *The Hematologist* is free of bias. *The Hematologist* accepts no outside funding and has no advertising of any kind.

American Society of Hematology Self-Assessment Program®

ASH also publishes a self-assessment review approximately every three years. The *American Society of Hematology Self-Assessment Program (ASH-SAP®)* is a comprehensive review text with a multiple choice review workbook. The *ASH-SAP* is also adapted for use by those recertifying as hematologists with the ABIM. The *ASH-SAP* editors and authors complete COI forms and the two co-editors, along with the peer reviewers, are responsible for ensuring the absence of bias.

Hematology: The ASH Education Program Book

Each year, ASH requires all speakers invited to participate in our education program to prepare a manuscript in advance of their presentation. These documents are prepared four to six months prior to the ASH annual meeting, peer reviewed, and compiled into the Education Program Book. Every meeting attendee receives this "textbook," which aims to provide practitioners with the standard of care in each of the major hematological diseases and disorders. (Rare conditions are reviewed at least once every three years or earlier if the standard of care changes.)

All authors and editors are required to disclose conflicts and this information is printed on the front page of each article.

The Education Program Book is supported with an educational grant from one or more corporate entities. There is no advertising in the Education Book; corporate support is acknowledged with a corporate logo on the back cover. No access to the manuscript is provided to any corporate supporter.

Committees

Currently, the Society has 54 committees that include: one Executive Committee (The ASH Board), 11 standing committees, 17 scientific committees, and 25 special committees. The focus of each committee has to do with either a specific mission of ASH or with the administration and management of the Society itself. Members and chairpersons of these committees are expected to disclose conflicts of interest. Each committee has an assigned COI Compliance Officer, who receives a copy of the COI disclosure statement for each member of that committee. The Vice President serves as the COI Compliance Officer for the Executive Committee. The COI Compliance Officers are responsible for dealing with conflicts as they arise during the course of the year and during committee meetings. The role of COI Compliance Officer involves all conflicts of interest, not merely those that relate to industry.

Annual disclosures are required for all committee members and employees of ASH. The COI Compliance Officer for each unit reviews these disclosures and is tasked with assuring that all members adhere to the letter and spirit of the COI policy. When there is a disagreement on whether COI exists, ASH has the following policy:

"When the question of a conflict exists, it will be fully discussed, with each side given the opportunity to state why they believe a conflict does or does not exist. The final decision on whether the individual has a conflict of interest will be made by a majority vote of the deliberative body at issue. The member alleged to

have a conflict of interest shall be disqualified from voting on the question and shall leave the meeting before a vote is taken on the issue."

Special Rules Regarding COI for Programs Targeted at Trainees Interested in Clinical or Translational Research

The Clinical Research Training Institute is one of the Society's educational programs, targeted at helping trainees (fellows and junior faculty) early in their careers who wish to obtain the skills needed to design and conduct studies involving human subjects. There are no corporate exhibits or handouts in the Institute. No corporate contributions have been sought for funding the Institute, and it is the firm position of the Society that none will be solicited at any time in the future.

From time to time, speakers who have worked for a pharmaceutical company are included as faculty because of their knowledge of the drug development process. These individuals are chosen solely for their knowledge of the subject matter and they do not make promotional presentations of any kind at the Clinical Research Training Institute.

Conflict-of-interest forms are completed by all faculty members for the Clinical Research Training Institute and are reviewed by the co-directors to assure that the faculty members state their relevant conflicts of interest or lack of same. At the meeting a disclosure slide must be included in the presentations and speakers must state their conflicts prior to their presentation. The Directors are present for all presentations for review of educational content and will intervene as necessary to ensure that faculty do not exhibit biased behavior or adversely influence trainees or the curriculum. COI training is included in the Clinical Research Training Institute curriculum.

Special Rules for Developing Clinical Guidelines

From time to time, ASH will sponsor an activity designed to develop evidence-based clinical guidelines. The members of these committees are appointed by the Executive Committee of the Society.

All ASH members nominated as potential members of a guideline-writing committee will be required to disclose COI. If any candidate for membership on a guidelines committee has a financial relationship with a company whose drugs or devices might be included in the guidelines, they will be excluded as candidates for the guideline-writing committee. The writing committee will gather data from a wide variety of sources, including the relevant company and scientists or physicians who are actively working with that company. This is critical because the guideline-writing committee will need input from those most knowledgeable about the subject. The writing committee will then apply evidence tests to the information gathered to determine how much it can be relied upon in formulating the guidelines. (ASH has used evidence to formulate clinical guidelines since 1994, when it developed practice guidelines concerning idiopathic thrombocytopenia purpura, see Cook and Giacomini. "The Trials and Tribulations of Clinical Practice Guidelines" JAMA; 1999. 281: 1950-1951) As is the case with all ASH committees, the guideline-writing committee will have a COI Compliance Officer assigned. That individual will monitor evolving COI during the deliberative and reportage processes.

Special Rules Regarding Corporate Symposia That Take Place Prior to the ASH Annual Meeting

The ASH annual meeting is generally held on the first Saturday in December and runs through Tuesday afternoon. ASH provides opportunities for industry to sponsor symposia on the Friday that precedes the meeting. Each Friday Satellite Symposium (FSS) is evaluated by at least two members of ASH who complete a standardized form. The evaluators attend the entire symposium and are instructed to report any

bias or other violation of ASH rules. In addition, every attendee who desires CME credit must complete an evaluation form. The questions on the evaluation form, which include questions about whether there was any bias in the presentation, are specified by ASH, and all FSS participating companies must agree to make original CME evaluation forms available to ASH after the session. Any company that violates ASH FSS rules can be removed from the exhibition hall at the ASH annual meeting. The threat of expulsion from the exhibit hall has been used on at least two occasions in the past ten years and has resulted in immediate compliance.

Multiple strategies are employed by ASH to control COI in the Friday Satellite Symposia.

1. Peer review: A company that wishes to sponsor a Friday Satellite Symposium must apply to ASH using a defined grant application. Applications are reviewed by the FSS Study Section, a group of members, who meet together to review the applications.
2. Controlling COI in peer review: All members of the FSS Study Section must declare COI using the forms for speakers and chairpersons. The chair of the study section can have no conflicts, and ASH keeps the number of members of the FSS Study Section who have COI to a minimum. A COI monitor is assigned to review COI declarations and monitor discussions. The monitor will ensure that members with COI are recused at the proper time, and that conflicted members do not have the opportunity to express an opinion or recommendation on the subject with which s/he is conflicted.
3. Separating participation in FSS from the formal educational activities of ASH: This year ASH established a policy preventing all individuals invited to lecture at the annual meeting from participating as a presenter or reviewer at the FSS that immediately precedes the annual meeting. This policy is posted on the ASH Web site and is directly communicated to commercial entities desiring a FSS and to all ASH educational program chairs.
4. Corporate sponsors of FSS programs must sign an agreement that includes a number of requirements (see appendix B).

IV. CONCLUSION

Biotechnology and pharmaceutical industries sponsor some of the exhibits at ASH annual meetings, may participate in the Friday Satellite Symposia that precede the ASH annual meeting, and may provide unrestricted educational grants to support the Society's educational and scientific missions. Many ASH members, speakers, and other volunteers, as well as their institutions are involved in pharmaceutical-sponsored clinical trials or have other relationships supported by industry. Recognizing both the importance of collaboration between scientists and industry as well as the conflicts of interest these arrangements present, ASH has created clear policies designed to protect the integrity of its core mission from being influenced by industrial supporters.

Appendix A: General Positions of ASH on COI

ASH has also considered conflict-of-interest matters that pertain to the conduct of research. Although the Society believes these matters are best addressed by institutions, rather than professional societies, we offer these general positions:

Conduct of Phase III Clinical Trials; Freedom from COI: For the conduct of phase III clinical trials ASH expects that the following individuals will be free of COI:

1. Persons who serve as principal investigators with decision-making authority over trial design and conduct;
2. Members of the trial's executive committee; and
3. Members of the trial's data safety and monitoring board.

Phase III clinical trials; Interdictions: For the conduct of phase III clinical trials, ASH agrees with the American Society of Clinical Oncology (ASCO) (2) that the following should be interdicted:

1. Payment of finders' fees for referral or accrual to a trial;
2. Payment of bonuses for achieving certain levels of accrual by specified dates;
3. Payments contingent on any particular research outcomes; and
4. Research contracts in which the sponsor has the ability to override the principal investigator's or executive committee's decision to publish or present trial results.

Late phase validation trials; Exclusion of inventors: ASH agrees with Lo et al (3) that inventors should not lead Phase III clinical trials because "In clinical trials, investigators make many judgments that may affect the safety of the subjects and the results of the trial, including whether a person is eligible to participate, whether a participant should receive a modified dose of a drug, whether an adverse event has occurred, whether an adverse event is related to the intervention, and whether an adverse event must be reported. These decisions are difficult to regulate or oversee, because they arise continually in all phases of a trial and require considerable discretion." This contrasts with the ASCO policy of granting exemptions to an inventor of a unique technology or treatment being evaluated in a trial. ASH feels that inventors should not serve as the leader of a late phase (either phase III validation studies or studies expected to be the basis for applications to the FDA) without personal and institutional divestiture.

Commercial restrictions on data access: The Society and its journal insist that principal investigators and authors have access to a copy of the original data and that the published work evolves from that access. The provision, by the company to the investigator, of summaries of such data is inadequate. *Blood* will publish work only if a funding arrangement ensures access to all of the data.

Institutional conflicts of interest: The Society agrees with the AAMC (1) that decisions about conducting "a particular human subjects research project in the presence of an institutional conflict of interest should be governed by a 'rebuttable presumption' against doing the research at or under the auspices of the conflicted institution." (Ref 1, page 15)

Appendix B: Friday Satellite Symposia Guidelines

Corporate sponsors of Friday Satellite Symposia programs must sign an agreement affirming their agreement to comply with the following guidelines:

Guidelines

1. *Statement of Purpose: Program is for scientific and educational purposes only and will not promote the company's products, directly or indirectly.*
2. *Control of Content & Selection of Presenters and Moderators: Accredited provider is responsible for control of content and selection of presenters and moderators. The commercial supporter agrees not to direct the content of the program. The commercial supporter, or its agents, will respond only to provider-initiated requests for suggestions of presenters or sources of possible presenters. The commercial supporter will suggest more than one name (if possible); will provide speaker qualifications; will disclose financial or other relationships between it and the speaker, and will provide this information in writing. Accredited provider will record role of commercial supporter, or its agents, in suggesting presenter(s); will seek suggestions from other sources, and will make selection of presenter(s) based on balance and independence.*
3. *Disclosure of Financial Relationships: Accredited provider will ensure meaningful disclosure to the audience, at the time of the program, of (a) funding from the commercial supporter and (b) any significant relationship between the sponsor and the commercial supporter (e.g., grant recipient) or between individual speakers or moderators and the commercial supporter.*
4. *Involvement in Content: There will be no "scripting," emphasis, or direction of content by the commercial supporter or its agents.*
5. *Ancillary Promotional Activities: No promotional activities will be permitted in the same room or oblique path as the educational activity. No product advertisements will be permitted in the program room.*
6. *Objectivity & Balance: Provider will make every effort to ensure that data regarding the company's products (or competing products) are objectively selected and presented, with favorable and unfavorable information and balanced discussion of prevailing information on the product(s) and/or alternative treatments.*
7. *Limitations on Data: Provider will ensure, to the extent possible, meaningful disclosure of limitations on data, e.g., ongoing research, interim analyses, preliminary data, or unsupported opinion.*
8. *Discussion of Unapproved Uses: Provider will require that presenters disclose when a product is not approved in the United States for the use under discussion.*
9. *Opportunities for Debate: Provider will ensure meaningful opportunities for questioning or scientific debate.*
10. *Independence of Sponsor in the Use of Contributed Funds:*
 - a) *funds should be in the form of an educational grant made payable to the **American Society of Hematology**;*
 - b) *all other support associated with the CME activity (e.g., distribution of brochures, preparation of slides, etc.) must be given with the full knowledge and approval of the American Society of Hematology;*
 - c) *no other funds from the commercial supporter will be paid to the program director, faculty, or others involved with the CME activity (additional honoraria, extra social events, etc.).*

The commercial supporter agrees to abide by all requirements of the ACCME Standards for Commercial Support of Continuing Medical Education. The accredited provider agrees to: (1) abide by the ACCME Standards for Commercial Support of Continuing Medical Education; (2) acknowledge educational support for the commercial supporter in program brochures, syllabi, and other program materials; and (3) upon request, furnish the commercial supporter a report concerning the expenditure of the funds provided.

Appendix C: References

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6. ICMJE (International Community of Medical Journal Editors). 2007. *Uniform Requirements for Manuscripts Submitted to Biomedical Journals: Writing and Editing for Biomedical Publication* (especially Sections A and D). Located at <http://www.icmje.org/icmje.pdf>

7. PhRMA (Pharmaceutical Research and Manufacturers of America). 2004. *Code on Interactions with Healthcare Professionals*. Located at <http://www.phrma.org/files/P>

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