



POB 9311
Ogden, Utah 84409
801-564-5585

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June 21, 2021

Ryan Child, CPA
Katie Gibbons, MST
Child Richard CPAs & Advisors
2490 Wall Ave. #100
Ogden, Utah 84401

Dear Ryan and Katie,

The OSMS Board of Directors initiated the following policies in 2021:

Although OSMS was awarded full accreditation for the next four years from November 30, 2020 to November 30, 2024, the Utah Medical Association (UMA) Continuing Medical Education (CME) determined that our program has several criteria that will need to be brought into compliance and addressed in a Progress Report. Therefore, this will be the first of several letters indicating policy changes to our processes.

1. Criteria 7 SCS1 Independent from ineligible company interests in its CME planning implementation and evaluation; Selection of all persons and organization in the position to control the content. Employee of a commercial interest used as faculty.

Employee of a commercial interest was used as faculty for the 2019 Healthcare to the World course. Speaker, Dr. Briggs disclosed he was an employee of doTERRA. The provider was unable to demonstrate it has implemented process to ensure employees of an ACCME-defined commercial interests have no control of CME activity content that is related to clinical applications or clinical recommendations concerning the business lines or products of the employer.

OSMS will not have any employees or owners of ACCME-defined ineligible companies related to their products or services in the planning or implementation of CME activities.

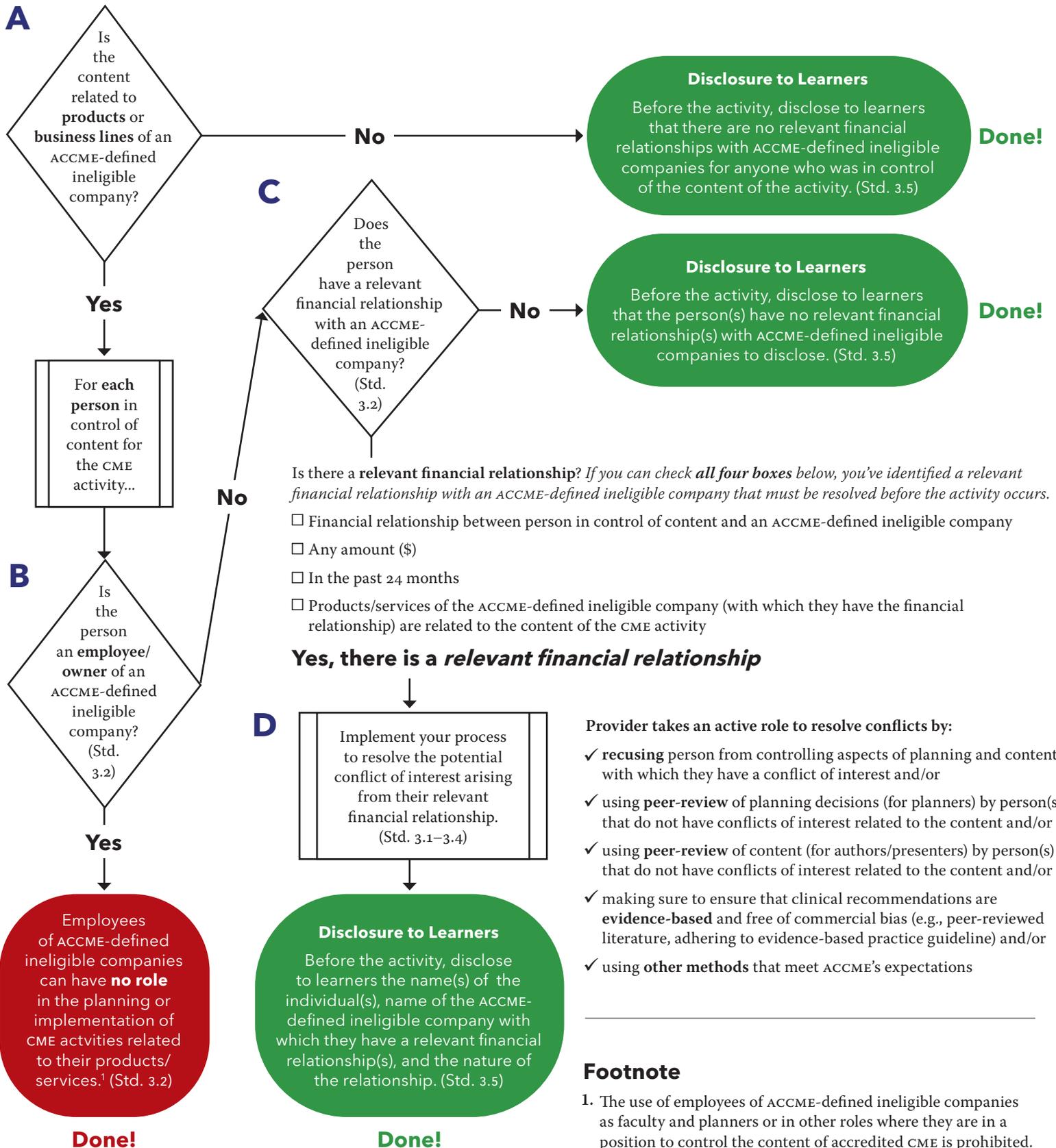
This was proposed by CME Chair Chad M. Gonzales, MD at the March 24, 2021 CME Meeting. Two processes have been implemented in the CME process at OSMS. The first is that a flowchart for the identification, mitigation, and disclosure of relevant financial relationships will be given out at all OSMS advisory meetings to ensure that all board members as well as advisory members are aware of this critical component of CME. Please view the flowchart in the second page of this document. The second process is that the following will be put on all Standards for Integrity and Independence in Accredited Continuing Education Disclosure Forms for Planners, Teachers, Instructors, Faculty, Authors, Writers, Reviewers, or anyone else that could be in control of content.

Please put agree or disagree next to this: I am not an owner or employee of an ACCME-defined ineligible company. If I am, I realize that I can have no role in the planning or implementation of CME activities related to my products/services. Visit: [How can I determine if my organization is an ineligible company \(formerly known as a commercial interest\)? | ACCME](#)

Sincerely,
Teresa Puskedra
Executive Director
Ogden Surgical-Medical Society
801-564-5585

Flowchart for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships

Use this flowchart at the beginning of your planning process for CME activities to ensure independence from ACCME-defined ineligible companies. Start at **A** below.



Footnote

1. The use of employees of ACCME-defined ineligible companies as faculty and planners or in other roles where they are in a position to control the content of accredited CME is prohibited.