

COLLECTING DISCLOSURE INFORMATION FOR CME ACTIVITIES

Purpose: To collect disclosure information from individuals who are in a position to control the content of continuing medical education (CME) activities, and analyze this information to determine if there is a conflict of interest.

Per the Accreditation Council on Continuing Medical Education standards for commercial support, disclosure information must be collected from all individuals in a position to control the content of CME activities, and this information must be conveyed to the learner.

1. The AACC Disclosure Form is to be distributed and collected from all individuals in a position to control the content of the CME activity, including (1) planning committee members; (2) moderators; (3) speakers; (4) authors; and any other individuals in a position to control the content of the CME activity.
2. The individual must disclose if he/she or an immediate family member has:
 - (a) financial relationship(s) with a company or companies that occurred within the past 12 months and **the company's specific products or services will be referenced or discussed in the CME activity**. The type(s) of the relationship and the company name(s) must be provided.

OR

- (b) no financial relationships as defined in scenario (a) above.

*(Note: If an individual or immediate family member has a financial relationship with a company, **but the company's specific products or services will not be referenced or discussed in the CME activity**, then disclosure of this relationship is not necessary.)*

3. As the forms are collected, the information must be reviewed to determine if there is a conflict of interest. A conflict of interest occurs if an individual discloses a financial relationship as described in scenario (a) above. If there is a conflict, it must be resolved immediately and prior to the CME activity, with documentation of how it was resolved. See procedure below for **Resolving Conflicts of Interest**.
4. The information from the disclosure forms must be presented to the audience prior to the start of the CME activity (e.g., handout, slide). The handout or slide must list each person who completed the disclosure form and what was disclosed. ***Even if an individual has disclosed that he/she has no relevant financial relationships, this information must be conveyed to the audience.***

If someone has disclosed they have a relationship with a company, the company name and nature of the relationship (grant/research support, consulting fee, stocks/bonds, etc.) must be included. A copy of the disclosure handout or slide must be submitted to the CME Officer at AACC.

5. If an individual in a position to control the content of the CME activity refuses or fails to complete the disclosure form, he/she must be disqualified from this position. If the individual is a speaker and it is too late to replace him/her, then this person's presentation will be excluded from CME accreditation.
6. If a speaker submits a disclosure form immediately prior to his/her presentation, then the disclosure information must be announced verbally to the audience prior to the presentation. A representative who is in attendance at the time of the verbal disclosure must attest, in writing:
 - (a) confirmation that verbal disclosure did occur
 - (b) itemize the content of the disclosed information, and
 - (c) note any potentially biased portions of the presentation

This written documentation must be submitted to the CME Officer at AACC.

RESOLVING CONFLICTS OF INTEREST FOR CME ACTIVITIES

Purpose: To resolve any conflicts of interests identified from the disclosure forms collected from individuals who are in a position to control the content of CME activities.
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Per the Accreditation Council on Continuing Medical Education standards for commercial support, any identified conflicts of interest must be resolved prior to the CME activity. This requirement ensures that the CME activity is independent of any commercial interests and that its purpose and contents are aligned with the best interests of the public.

1. A conflict of interest occurs when an individual discloses that he/she (or an immediate family member) has (1) a financial relationship with a company that occurred within the past 12 months and (2) **the company's specific products or services will be referenced or discussed.**
2. Such conflicts must be resolved immediately and prior to the CME activity. Below is a list of choices for resolving the conflict:
 - (a) Select someone else to control the CME content. For example, if a proposed speaker has a conflict of interest related to the content, assign a different speaker who does not have a conflict of interest with the content.
 - (b) Change the content of the individual's assignment. For an individual with a conflict of interest, his/her role or assignment can be changed to remove the conflict.
 - (c) Change the focus of the CME activity so that it no longer contains discussions of the company's products or services.
 - (d) Employ peer review (or a similar system), to analyze the contents of the CME activity in order to determine if it is valid, presents a balanced view, and references the best available evidence in the literature. If the contents meet these criteria, then no further changes would be necessary.

3. There certainly may be other ways of resolving conflict(s) in addition to the options listed above. The objective is to modify an individual's control over the CME content (or modify the CME content) so that the conflict of interest is no longer present. If there is any uncertainty about whether or not a conflict exists, the CME Advisory Committee should be consulted.
4. An explanation of how the conflicts of interest were resolved must be documented in section 3.3D of the application or in separate documentation submitted to the CME Officer.

DOCUMENTING COMMERCIAL SUPPORT FOR CME ACTIVITIES

<p>Purpose: To document the terms of agreement between the educational provider (sponsor) and companies providing financial, or in-kind, contributions to be used to pay for all or part of the costs of presenting a CME activity.</p>

Per the Accreditation Council on Continuing Medical Education standards for commercial support, if a company provides support in the form of a financial (or in-kind) contribution for a CME activity, there must be a signed written agreement between the educational provider (sponsor) and the company (supporter), documenting the terms, conditions, and purposes of the support. This requirement ensures that the supporting company agrees not to influence or direct the content of the CME activity, and that the educational provider will appropriately use the contributed funds for covering the costs of presenting the CME activity.

1. When a company contributes financial, or in-kind, support for a CME activity, the Letter of Agreement for Commercial Support must be completed and signed by a representative of both the company and the educational provider. The completed letter must be forwarded to the CME Officer at AACC.
2. The educational provider must directly pay/reimburse any faculty, planning committee members, and any others involved with the supported CME activity per the AACC policy and procedures on paying honoraria and reimbursing for expenses.
3. No other payments/funds may be given to the faculty, planning committee members, and/or others for their role(s) in the CME activity. Therefore, a company may not pay for any additional expenses associated with the CME activity, e.g., honoraria, registration fees, social events, etc.
4. If individuals are listed in the CME activity program as moderators or speakers, but participate in the remainder of the activity as a learner, their honoraria can be paid and their expenses reimbursed for their moderator or speaker role(s) only.
5. Funds from commercial support may not be used to pay expenses (travel, lodging, honoraria, or personal expenses) for non-faculty participants of a CME activity (with the

exception of scholarships). The funds may be used, however, to cover such expenses for bona fide employees and volunteers of the educational provider.

6. The educational provider must document the receipt and expenditure of commercial support, such as through financial statements.
7. If the educational provider receives payments from a company for an event separate from the CME activity (e.g., promotional reception, exhibit space), this is to be handled as a separate business transaction from the commercial support. Furthermore, the educational provider is not accountable for the content of advertising that may occur in such a reception or exhibit because the information transferred in these events is not part of the CME activity.
8. The educational provider must disclose to the learners all commercial support (financial or specified in-kind services) received for a CME activity. This can be done through acknowledgments in program materials, such as brochures or activity materials (syllabus, hand-outs). The acknowledgment may include the company name (and company logo); however, it may not include product-specific information or product-specific logos.