Disclosure to Learners Policy

It is the policy of CMU College of Medicine Office of Continuing Medical Education (CMED OCME) to adhere to Accreditation Council for Continuing Medical Education (ACCME) Criteria, Policies and Standards for Commercial Support and content validation in order to ensure fair balance, independence, objectivity, and scientific rigor in all its accredited activities. Anyone in a position to control content of a CME activity (all speakers, faculty, course directors, planners, moderators, reviewers, and staff members) are expected to disclose relevant financial relationships with commercial interests regarding their participation in the activity. Relationship information is analyzed to determine whether conflicts of interest exist. All conflicts of interest are resolved prior to participation in the planning or implementation of an activity. (See CMED OCME Policy and Procedures on Resolution of Conflicts of Interest.)

Speakers, presenters and/or authors are also expected to disclose any discussion of off-label or investigational uses of FDA approved commercial products or devices, or products or devices not yet approved in the United States.

Planners, moderators, speakers and/or authors must disclose relationships with a commercial interest if both (a) the relationship is financial and occurred within the past 12 months and (b) the individual has the opportunity to affect the content of CME about the products or services of that commercial interest. This includes any relationship of a spouse or significant partner. Such disclosures must include: the name of the individual; the name of the commercial interest; and the nature of the relationship the person has with each commercial interest.

Planners, moderators, speakers and/or authors with no relevant financial relationship(s) must disclose that no relevant financial relations(s) exist.

The source of all support from commercial interests must be disclosed to learners. When commercial support is “in-kind,” the nature of the support must be disclosed. Acknowledgement and purpose of educational grants must be disclosed in full.

Disclosures must never include the use of a corporate logo, trade name or product-group message of an ACCME-defined commercial interest.

For all accredited CME activities, disclosures must be made at the beginning of the CME presentation, preferably in writing, on a PowerPoint slide, in handouts, syllabus, brochures and/or verbally. Enduring materials must include written disclosure prior to the start of the recorded activity.

It is recommended that planners and faculty/speakers disclose to learners when products or procedures being discussed are off-label, unlabeled, experimental, and/or investigational (not FDA approved), and there are any limitations on the information presented such as data that are preliminary or that represent ongoing research, interim analyses, and/or unsupported opinion.

Verbal Disclosure to Learners: Disclosure of information about relevant financial relationships may be disclosed verbally to participants at a CME activity. When such information is disclosed verbally at the beginning of a CME activity, joint providers must be able to document with written verification that appropriate verbal disclosure occurred at the activity. With respect to this written verification:

1. A representative of CMED OCME or of the joint provider who attended at the time of the verbal disclosure must attest, in writing:
   a. that verbal disclosure did occur; and
   b. itemize the content of the disclosed information; or that there was nothing to disclose.

2. The documentation that verified that adequate verbal disclosure did occur must be submitted to the OCME within one month of the activity.