

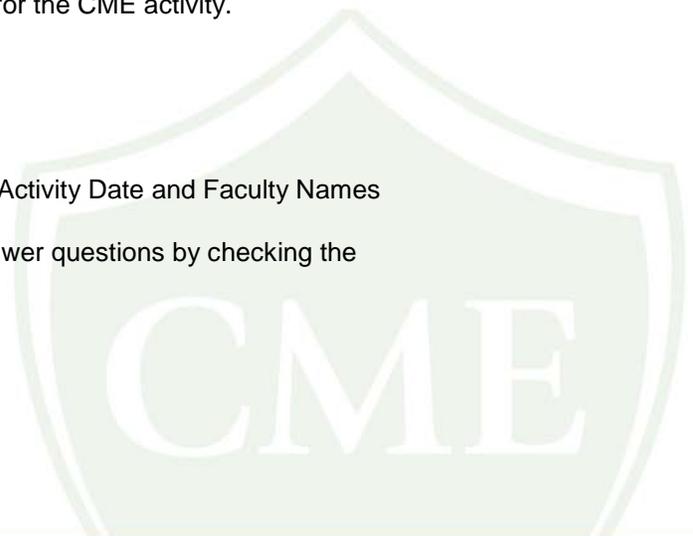
<i>Policy #:</i>	<b>9.0</b>	<i>Origination Date:</i>	2002
<i>Subject:</i>	<b>Faculty Disclosure</b>	<i>Date of Last Revision:</i>	July 2015

Faculty must disclose real or apparent conflict of interest relating to the topics they are presenting in the educational activity. In addition, faculty will also disclose any discussions of unlabeled or non-FDA approved drugs or devices, diagnostic or treatment therapies during their presentation(s). All faculty must complete the online Faculty Disclosure Form, linked to their profile in ICMES. This form is intended to disclose to the activity attendees the existence of any real or apparent significant financial interest or other relationship a speaker and their spouse or partner has:

- with the manufacturer(s) of any commercial product(s)
- with provider(s) of any commercial service(s)
- that exists at the time of the activity or existed in the 12 months preceding the activity
- discussed in an educational presentation, whether or not there is direct commercial support for the CME activity.

The online form includes:

- name of the CME Activity, Activity Date and Faculty Names
- faculty member should answer questions by checking the appropriate box



- faculty member must disclose nature of relevant financial relationship(s), including that there are no relationships to disclose
- if there are relevant financial relationship(s) with non-governmental entities such as commercial supporters within the 12 months prior to the date of the activity, the faculty member must specify:
  - name of the commercial interest
  - nature of relationship the person has with the commercial interest (such as consultant, speaker's bureau)
  - each faculty member signs and dates the form.

#### Verbal Disclosure

At the start of the activity, the activity director or speaker will announce to the attendees verbally and/or with visual media the disclosure information concerning the event faculty.

This includes either:

- disclosure listing specific relations with any pharmaceutical companies
- no significant relationship to disclose

#### Refusal to Disclose

If a potential faculty member refuses to provide the disclosure, that individual will be not be eligible to serve in any capacity in the delivery of the CME activity. Refusal should be annotated on the online form by the CME coordinator and notice escalated to the Program Director and Director of CME.

- It will be the responsibility of the Program Director to replace the speaker or cut the activity short.

### **9.1 Resolution of Conflict of Interest**

#### Identification of Conflicts of Interest (COI)

Planning team members must disclose their relevant financial relationships prior to the activity planning using the Faculty Disclosure & Conflict of Interest Resolution form. The speakers, presenters and authors must submit their completed disclosure forms online at least 7 days prior to their presentations.

Disclosures are used to determine whether or not a conflict exists. Factors to be considered in identifying whether an individual who is in a position to control the content of an activity has a COI include:

- The focus and content of the educational activity
- The individual's role in the activity
- An individual's past financial relationships with or interests in a commercial entity
- An individual's past financial relationships with or interests in a commercial entity pertaining to content of the activity
- The individual's spouses past financial relationships with or interests in a commercial entity

#### Procedure to Resolve Conflicts of Interest (COI)

If the individual has no financial relationship, no further action is required.

If the individual or individual's spouse has financial relationships with one or more commercial interests, the CME staff assesses potential risk. If a conflict is suspected, the review is escalated to the Director of CME, and the Medical Director of CME, if necessary, for resolution. Inova CME may identify an independent content reviewer to conduct a secondary review.

#### Mechanisms to Resolve Conflicts of Interest (COI)

The following are potential mechanisms that can be used to resolve a conflict:

- Completion and OCME approval of the Faculty Disclosure & Conflict of Interest Resolution form
- Change the focus of the presentation so that the content is not about products or services related to the commercial entity and make recommendations that are based on structured review for best evidence
- Review the presentation slides and handouts prior to activity in light of evidence-based guidelines by the Program Director or the Department Chair and recommend changes if appropriate
- Limit the presentation or material to specific areas in which the financial relationship is not relevant (e.g., presentation limited to data/research – someone else address recommendations)
- Selecting an alternate speaker
- Omitting recommendations for specific products

#### Monitoring

A variety of monitoring efforts will be implemented as part of this policy.

- Review of COI statements and actions taken in accordance with this policy
- The OCME will review all materials to be presented, as appropriate to the Program Director the Director of CME and the Medical Director of CME, as needed.
- Review of evaluation data for presence of bias. Indications of >20% of participants indicating bias in a presentation or in the overall activity will trigger a retroactive review of all materials presented to the participants, discussion with the Program Director, the Director of CME and/or the CME Advisory Board. Individuals whose ratings indicate presence of bias may be precluded from future Inova CME activity planning or presentation.

### **9.2 Attestation**

A written attestation is required when the disclosure is presented in the verbal format before the presentation starts. The attestation is signed and dated by a qualified representative (for example, the activity director, moderator, attendee or provider staff member) within a week of the activity.

### **9.3 Content Validation**

The CME activity will comply with ACCME's Content Validation Statement.

Activities that promote recommendations, treatment, or manners of practicing medicine or pharmacy that are not within the definition of CME or, are known to have risks or dangers that outweigh the benefits or, are known to be ineffective in the treatment of patients will not be certified for credit.

Presentations and CME activity materials must give a balanced view of therapeutic options; use of generic names will contribute to this impartiality. If the CME educational materials or content includes trade names, where available, trade names from several companies must be used. No one trade name will be favored in any presentations that award CME credit.

