

FULL DISCLOSURE PROCEDURES

Planners (all committee members involved in selecting speakers and/or content) should sign disclosure statements at the very *start* of the planning process in order to discover if any planners have potential conflicts of interest.

Planner conflicts of interest (COI) be identified and resolved immediately, prior to selecting faculty/content. Speaker conflicts need to be identified and resolved prior to seeking accreditation.

Managing/Resolving Conflicts of Interest

Conflict of interest becomes an issue only if the individual discloses a relationship, **within the last 12 months** of submitting the form, with an ACCME defined “**commercial interest**” (see definition below) that makes a product/service **related to the topic** on which they are presenting. The Course Director, or another independent party, should contact the individual; review the speaker’s presentation (slides, power point presentation, or handout) to determine if a real or perceived bias exists, keeping in mind that any clinical recommendations must be based on scientific evidence. Multiple therapies (if applicable) must be mentioned and generic names of products should be used.

Please print out “**Attachment 5 Conflict of Interest Resolution Form**” and choose the appropriate course of action.

** COI: Financial Relationship (Speaker’s Bureau), Royalty, Intellectual Property Rights, Stock, Ownership Interest, etc.

ACCME definition of a *commercial interest*: “any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.”

Exceptions (These do not count as a commercial interest):

501-C Non-profit organizations (As long as they do not advocate for commercial interests.)	
Government organizations	Non-health care related companies
Liability insurance providers	Health insurance providers
Group medical practices	For-profit hospitals
For profit rehabilitation centers	For-profit nursing homes
Blood banks	Diagnostic laboratories