

DISCLOSURE PROCEDURES

Before you begin planning your education, collect disclosure information from all planners, faculty, and others in control of educational content about **all** their financial relationships with “**ineligible companies**” within the prior **24** months.

(Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.)

Review the disclosed relationships and exclude owners and employees of ineligible companies from participating as planners, faculty, or other roles unless the educational activity meets one of the **exceptions listed below**:

1. When the content of the activity is not related to the business lines or products of their employer/company.
2. When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations.
3. When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.

Determine which financial relationships are relevant to the content of the continuing education activity, mitigate those relevant financial relationships to prevent commercial bias, and disclose the presence or absence of all relevant financial relationships to learners before the activity.

Mitigating Financial Relationships

Please have a course director or planner, who does not have any financial relationships, complete the [Disclosure Mitigation Form](#) to document the steps that were taken to mitigate any financial relationships.

Disclosing to Learners

All relevant financial relationships with ineligible companies must be disclosed to the learners:

- The names of the individuals with relevant financial relationships.
- The names of the ineligible companies with which they have relationships (no logos or product names/messages).
- The nature of the relationships (such as “Research Grant”, “Speakers Bureau”, etc)
- A statement that all relevant financial relationships have been mitigated.

Please use our templates: Conference Disclosure for live events or Monitor Disclosure Slide for RSS activities.

Eligible Companies That MAY Be Accredited

Ambulatory procedure centers	Infusion centers
Blood banks	Insurance or managed care companies
Diagnostic labs that do not sell proprietary products	Nursing homes
Electronic health records companies	Pharmacies that do not manufacture proprietary compounds
Government or military agencies	Publishing or education companies
Group medical practices	Rehabilitation centers
Health law firms	Schools of medicine or health science universities
Health profession membership organizations	Software or game developers
Hospitals or healthcare delivery systems	

Ineligible Companies That CAN NOT Be Accredited

- Advertising, marketing, or communication firms whose clients are ineligible companies
- Bio-medical startups that have begun a governmental regulatory approval process
- Compounding pharmacies that manufacture proprietary compounds
- Device manufacturers or distributors
- Diagnostic labs that sell proprietary products
- Growers, distributors, manufacturers, or sellers of medical foods and dietary supplements
Manufacturers of health-related wearable products
- Pharmaceutical companies or distributors
- Pharmacy benefit managers
- Reagent manufacturers or sellers

Exceptions: Accredited providers do **not** need to identify, mitigate, or disclose relevant financial relationships for any of the following activities:

Accredited education that is non-clinical, such as leadership or communication skills training.
Please reach out to CMIE before starting your application for more information.

To view the Standards for Integrity and Independence Guidelines:
[Standards for Integrity and Independence in Accredited Continuing Education](#)