Northern Light
Eastern Maine Medical Center

Date ___/___/_____

Disclosure of All Financial Relationships from Planners, Faculty, and Others

Name of Individual:

Title of Continuing Education:

Date and Location of Education:

Individual's prospective role(s) in education
Identify the prospective role(s) that this person may have in the planning and delivery of this education *(choose all that apply)*

☐ Planner
Examples: planning committee, staff involved in choosing topics, faculty, or content

☐ Teacher, Instructor, Speaker

☐ Faculty, Author

☐ Writer

☐ Reviewer

☐ Other

As a prospective planner or faculty member, we would like to ask for your help in protecting our learning environment from industry influence. Please complete the form below and return it to CME Administrative Assistant Tiffany Knox.

The ACCME Standards for Integrity and Independence require that we disqualify individuals who refuse to provide this information from involvement in the planning and implementation of accredited continuing education. Thank you for your diligence and assistance. If you have questions, please contact the CME Administrative Assistant @ tknox@northernlight.org.

To be Completed by Planner, Faculty, or Others Who May Control Educational Content

Please disclose **all financial relationships** that you have had in the past 24 months with ineligible companies (see definition below).
For each financial relationship, enter the name of the ineligible company and the nature of the financial relationship(s). There is no minimum financial threshold; we ask that you disclose all financial relationships, regardless of the amount, with ineligible companies. You should disclose all financial relationships regardless of the potential relevance of each relationship to the education.

Enter the Name of Ineligible Company	**Enter the Nature of Financial Relationship**	**Has the Relationship Ended?**
An **ineligible company** is any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. For specific examples of ineligible companies visit **accme.org/standards**.	Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.	If the financial relationship existed during the last 24 months, but has now ended, please check the box in this column. This will help the education staff determine if any mitigation steps need to be taken.
Example: ABC Company	Consultant	x
		☐
		☐
		☐
		☐
		☐
		☐

In the past 24 months, I have not had **any** financial relationships with any ineligible companies. ☐

By signing this form, I understand that if I enter into any financial relationships with **any** ineligible companies within the next 24 months it is **my responsibility** to notify the CME department in writing of such relationship. I also understand that this form needs to be updated every 24 months.

I attest that the above information is correct as of this date of submission. Signature:

Disclosure of all faculty, planners, teachers, speakers, writers, authors, and reviewers must accompany your application for approval of any CME activity.

Glossary of Terms

Commercial Interest

The ACCME defines a “commercial interest” as any entity producing, marketing, re-selling, or distributing health care goods or services, consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests. For more information, see www.accme.org.

Financial relationships

Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected. ACCME considers relationships of the person involved in the CME activity to include financial relationships of a spouse or partner.

Relevant financial relationships

ACCME focuses on financial relationships with commercial interests in the 24-month period preceding the time that the individual is being asked to assume a role controlling content of the CME activity. ACCME has not set a minimal dollar amount for relationships to be significant. Inherent in any amount is the incentive to maintain or increase the value of the relationship. The ACCME defines “'relevant' financial relationships” as financial relationships in any amount occurring within the past 24 months that create a conflict of interest.

Conflict of Interest

Circumstances create a conflict of interest when an individual has an opportunity to affect CME content about products or services of a commercial interest with which he/she has a financial relationship.

NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER Statement of Conflict Resolution and Disclosure including Content Validation

In accordance with the Accreditation Council for Continuing Medical Education (ACCME) Standards for Commercial Support: Standards to Ensure Independence in CME Activities it is the policy of NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER to ensure balance, independence, objectivity, and scientific rigor in all its continuing medical education (CME) activities. NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER requires everyone who can control the content of a CME activity to disclose all relevant financial relationships with any commercial interest. This information is utilized to 1) determine if a conflict exists, 2) resolve the conflict by initiating a content validation process, and 3) advise learners of this information. Any individual who refuses to (or chooses not to) disclose relevant financial relationships will be disqualified from participating as an instructor, planner or manager and cannot have control of or responsibility for the development, management, presentation or evaluation of a CME activity certified by NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER. Disclosures received by NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER from individuals in a position to control CME content are made transparent to learners prior to participating in the activity. NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER discloses the following information to learners: 1) the name of the individual, 2) the name of the commercial interest(s), and 3) the nature of the relationship the individual has with the commercial interest. NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER also discloses to learners the name(s) of commercial interests supporting each CME activity. Once a conflict is identified, a content validation process is initiated to ensure that the content or format of the CME activity and related materials will promote improvements or quality in healthcare and not promote a specific proprietary business interest of a commercial interest. To this end, it is the policy of NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER to conduct an unbiased review of all planned content for CME activities certified for credit to ensure adherence to the ACCME content validation statements and to resolve any actual or perceived conflict of interest that exists. NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER employs three primary metrics to validate CME content: 1) fair balance, 2) the scientific objectivity of studies mentioned in the materials or used as the basis for content, and 3) appropriateness of patient care recommendations made to learners.

CME Definition

Continuing medical education consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public, or the profession. The content of CME is that body of knowledge and skills generally recognized and accepted by the profession as within the basic medical sciences, the discipline of clinical medicine, and the provision of health care to the public.

ACCME's definition of CME content include:

- Management, for physicians responsible for managing a health care facility
- Educational methodology, for physicians teaching in a medical school
- Practice management, for physicians interested in providing better service to patients
- Coding and reimbursement in a medical practice

All faculty and planners receive this faculty disclosure that communicates the NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER information concerning expectations related to content validation and safeguards against commercial bias which are detailed. An individual presentation or initial draft of a conflicted faculty member's content are reviewed by a NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER staff member. If there are concerns identified by the content validation process, feedback may be requested from the course director or program chair of NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER.

NORTHERN LIGHT EASTERN MAINE MEDICAL CENTER requests that learners evaluate activities for the potential presence of bias.

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Worksheet for the Identification and Mitigation of Relevant Financial Relationships of Planners, Faculty, and Others

Note for Continuing Education Staff

Use this sample worksheet to identify and mitigate relevant financial relationships that you have identified for planners, faculty, and others who will control educational content for your education activity. Please make sure that (1) the mitigation strategy is appropriate to the person's role in the activity, and (2) that mitigation is implemented before each person takes on their role.

STEP 1: Review collected information about financial relationships and **exclude owners or employees of ineligible companies** from participating as planners or faculty.

After collecting all financial relationships from prospective planners, faculty, and others, exclude any persons who are owners or employees of ineligible companies. Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. For information about exceptions to this exclusion, see **accme.org/standards**.

STEP 2: Determine **relevant financial relationships.**

Review the information for all who persons whom you did not exclude in Step 1 and determine whether each person's financial relationships with ineligible companies are relevant to the content of the education you are planning. Financial relationships are relevant if the following three conditions are met for the prospective person who will control content of the education.

- ✓ A financial relationship, in **any amount,** exists between the person in control of content and in ineligible company.
- ✓ The financial relationship existed during the past **24 months**.
- ✓ The content of the education is related to the products of an ineligible company with whom the person has a financial relationship.

STEP 3: Choose a **mitigation strategy** for each person who has a relevant financial relationship and **implement** that strategy before the person assumes their role.

Using the list below, identify which mitigation strategy(ies) will be used for **all persons** with relevant financial relationships who control the educational content of the educational activity. You may select multiple strategies but be sure to use strategies **appropriate to the role(s)** that each person has. You can also identify your own strategies for mitigation.

Mitigation steps for planners *(Choose at least one)*

- ☐ **Divest** the financial relationship.
- ☐ **Recusal** from controlling aspects of planning and content with which there is a financial relationship
- ☐ **Peer review** of planning decisions by persons without relevant financial relationships
- ☐ Use **other methods** *(please describe)*:

Mitigation steps for faculty and others *(Choose at least one)*

- ☐ **Divest** the financial relationship.
- ☐ **Peer review** of content by persons without relevant financial relationships.
- ☐ Attest that clinical recommendations are **evidence-based** and **free of commercial bias** (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines)
- ☐ Use **other methods** *(please describe)*

STEP 4: Document the mitigation strategy(ies) you used for each person with a relevant financial relationship.

A	B	□	D
NAME OF PERSON	**ROLE(S) IN ACTIVITY**	**STEP(S) TAKEN TO MITIGATE RELEVANT FINANCIAL RELATIONSHIP**	**DATE IMPLEMENTED**
Example: Dr. Jones	*Planner*	*Recusal from topic/faculty selection*	*12/22/2021*

Please note: When applying for CME Activity Approval all individuals with a relevant financial relationship will need to be mitigated by this process.

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Examples of Communicating Disclosure to Learners

Use the sample language below to provide disclosure to learners in a format that can be verified at the time of accreditation. Disclosure must be provided to learners **before** engaging with the accredited education.

What gets disclosed to learners before the education?

For more information, visit accme.org/standards

If there are NO relevant financial relationships:	If there ARE relevant financial relationships:
Inform the learners that planners, faculty, speaker, and others in control of content (either individually or as a group) have no financial relationships with ineligible companies.	*Disclose name(s) of the individuals, name of the ineligible company(ies) with which they have a relevant financial relationship(s), the nature of the relationship(s), and a statement that all relevant financial relationship(s) have been mitigated.*
Examples:	**Examples:**
"Dr. Xin Lee, faculty for this educational event, has no relevant financial relationship(s) with ineligible companies to disclose."	*Nicolas Garcia, faculty for this educational event, is on the speakers' bureau for XYZ Device Company.*
"Ruth Hopkins, Dr. Maryam Elbaz, and Ken Sanders, authors of this educational activity, have no relevant financial relationship(s) with ineligible companies to disclose."	*Dr. Yvonne Gbeho, planner for this educational event, has received a research grant from ABC Pharmaceuticals.*
"None of the planners for this educational activity have relevant financial relationship(s) to disclose with ineligible companies whose primary business is marketing, selling, re-selling, or distributing healthcare products used by or on patients.	All the relevant financial relationships listed for these individuals have been mitigated.

Note:

- ✓ If commercial support is received, the accredited provider must also disclose to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education.
- ✓ Disclosure to learners must not include ineligible companies' corporate or product logos, trade names, or product group messages.
- ✓ It may be helpful to include definitions of terms to learners to support their understanding of your processes (e.g., ineligible companies, relevant financial relationships, etc...)