

# CME Disclosure Protocol

**Effective date:** April 2, 2018

**Functional area:** Continuing Medical Education (CME)

**Department:** Spectrum Health Office of Medical Education (OME)

- 1. Purpose:** To establish a protocol for disclosure of relevant and non-relevant financial relationships
- 2. Responsibilities:** CME personnel  
Spectrum Health Hospitals is accredited by the Michigan State Medical Society to provide Continuing Medical Education (CME) for physicians. The CME Office is responsible for ensuring compliance with the ACCME Essential Areas, Elements, Criteria, Policies and Standards for Commercial Support as well as other regulations as they relate to the quality of CME.
- 3. Regulations:**
  - 3.1.1** Spectrum Health Hospitals follows the ACCME Standards for Commercial Support ([www.accme.org](http://www.accme.org)). Anyone in a position to control content of an educational activity must disclose all non-relevant and/ or relevant financial relationships with any commercial interest(s) prior to the start of the activity. Disclosure must be documented.
  - 3.1.2** CME Committee members' disclosure statements are signed annually and updated immediately if changes occur. Resident/fellow physicians sign disclosure statements annually through the Resident Data Management System and are updated if changes occur.
  - 3.1.3** Spectrum Health Hospitals recommends speaker disclosure(s) are included with slide presentation as part of the first or second slide. The ACCME defines "relevant financial relationship" as relationships in any amount occurring within the past 12 months that create conflict(s) of interest. Relevant financial relationships are personal or business interests, including those of a family member(s). Financial relationships are relationships in which the individual benefits by receiving salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual fund(s), or other financial benefit. It is the policy of Spectrum Health Hospitals to require the provider to identify and manage conflicts of interest prior to the activity. The provider must be able to show that activity planners, organizers, and presenters have disclosed all non-relevant and/or relevant financial relationships prior to the start of the activity. Any individual who refuses to disclose will be disqualified from participating in the CME activity. Slides, handouts and educational materials should be reviewed prior to the activity start. When a conflict is identified the presenter will be asked to disclose the conflict of interest.

**3.1.4** A Disclosure Statement must be signed by:

- Each individual involved in the planning
- Each presenter/speaker/faculty member
- Members of a panel

**3.1.5** Disclosure must take place, and be documented. Upon approval of your CME activity a list of the individuals involved with the planning will be provided for display at your sign-in table, included in a handout or included with your slide presentation(s). Spectrum Health Hospitals recommends speaker disclosure(s) be included in the first or second slide of the presentation(s).

#### **4. Absence of Disclosure**

If Spectrum Health Hospitals CME Office is notified that disclosure did not take place, a letter will be sent to the physician responsible and activity organizer of the activity requesting an explanation. In addition they may be asked to send a letter to all attendees of the activity to let the attendees know of the potential conflict of interest due to the lack of disclosure. Future accreditation of this activity may be in jeopardy, and possibly placed on probation for non-compliance. It will be at the discretion of the CME Office and CME Committee to determine the necessary probationary period, and requirements for compliance.