Appendix 3: Disclosure Forms & Disclosure to Learners

To stay in compliance with our accreditation, we need to ensure that CE activities are free of commercial bias and that the individuals involved in developing CE activities have no conflict of interest (COI). In order to prevent potential COI, a process of disclosure has been created.

The disclosure process consists of two parts.

Part One

Every speaker and everyone involved in the planning of the activity must complete a ***Disclosure Form***. This form is used to collect information about the possibility of COI. (Those involved in the planning of an activity include directors, planning committee members, abstract reviewers, staff members, coordinators, etc.)

Part Two

The information found on the ***Disclosure Forms*** must be shared at the activity. This is called ***Disclosure to Learners***.

How do we make sure everyone who needs to complete a Disclosure Form has done so?

Electronic Submission

Disclosure Forms are completed and submitted online. The CE Office sends the request for completion via email. Requests may be autogenerated by the CE database or sent by a CE staff member. Each request contains a link to a website where the ***Disclosure Form*** is completed.

Annual Disclosure Process

Because so many individuals are involved in planning or speaking at more than one activity, they are asked to complete a global ***Disclosure Form*** that is valid for 12 months. This means the CE Office doesn't have to send multiple requests throughout the year. And it also means people don't have to complete a new form each time they speak at Grand Rounds or join the planning committee for an annual conference.

RSS Renewals

Most of our activities are Regularly Scheduled Series (RSS). These are renewed each November and are approved for credit from January 1 through December 31. On the renewal application, you will be asked for a list of planning committee members and their email addresses. The CE database will automatically send a link to complete a ***Disclosure Form*** to any planner whose form has expired. Once all of your planning committee members have completed their forms, you will be able to submit your application for review.

Ongoing RSS

For most of our RSS, information about sessions, topics, and speakers are submitted through the RSS Dashboard throughout the year. As you're scheduling new sessions, you will easily be able to see if the speaker has already completed a ***Disclosure Form*** within the past 12 months. If they haven't, The CE database will automatically send a link to complete a ***Disclosure Form*** to any speaker whose form has expired.

New Courses & New RSS

There's a good chance that the majority of people who need to complete a ***Disclosure Form*** for your activity have already done so. As you are filling in the list of planners on your application, you will see who has already completed a ***Disclosure Form*** within the past 12 months and who will receive the autogenerated email.

We strongly recommend contacting the members of your planning committee and speakers so that they know to expect to receive email from the CE Office. You can also include the following link which allows them to log in and complete their ***Disclosure Form*** at any time: https://wmed.cloud-cme.com/Form.aspx?FormID=88.

What does all of this have to do with Disclosure to Learners?

Everyone has completed a ***Disclosure Form***, so we're done, right? Well, no. We still need to make sure that this information is shared at the activity.

What needs to be disclosed?

Everything listed on the ***Disclosure Form*** needs to be shared at the activity. This means the name of the person, the company they have a relationship with, and the nature of the relationship.

For example: Dr Smith owns stock in ABC Pharmaceuticals and is on the speaker's bureau for XYZ Manufacturing.

But what if people said they have nothing to disclose?

That needs to be disclosed, too.

For example: Dr Smith owns stock in ABC Pharmaceuticals and is on the speaker's bureau for XYZ Manufacturing. All others involved in the planning of this activity have no relevant financial relationships to disclose.

Where do I find that information?

Go to the RSS Dashboard and review the "Disclosure" column to see the details of a person's completed ***Disclosure Form***.

How should I share this information at the activity?

The best way to ***Disclose to Learners*** is in writing. The CE Office will provide a h to distribute in the manner that will work best for your audience. If you plan to have handouts at the activity, you could include this page with the disclosure information. You can place a copy of the disclosure statement by your sign-in sheets. You can have a disclosure slide up on the screen as people come into the room and take their seats. This way you don't have to rely on one of your speakers to make a disclosure statement at the beginning of your activity.

So I can't share this information verbally?

Yes, you can. But you must also display the written ***Disclosure to Learners*** that was provided by the CE Office.

Everyone completed a Disclosure Form and that information was Disclosed to Learners. Now what?

Since the CE Office provided your ***Disclosure to Learners*** to you, you're all set. The CE Office retains a copy in your activity file to prove that this accreditation requirement was met.

But if someone checks the "yes, I do have relationships to disclose" box, will we lose credit for our activity?

Don't panic. That just means that there's a potential conflict of interest that needs to be resolved before that person can participate in planning or speaking at a CE activity. And because people are filling out a Disclosure Form that covers multiple activities, that relationship might not be relevant to your activity. (E.g. They own stock in a company that manufactures insulin, but you're doing an activity on brain tumors, so the relationship isn't relevant.)

But this does mean that the CE Office will follow up with that person. They may be asked to submit a copy of their presentation for review** or to limit their participation in the activity to areas outside where there is a potential COI. As long as the COI can be resolved, your CME for the activity will not be affected.

****If a copy of the presentation is requested by the CE Office, it must be provided.**

When does all of this need to be done?

30 Days In Advance

The list of people who need to disclose should be submitted to the CE Office *at least* 30 days before your activity.

2 Weeks In Advance

All *Disclosure Forms* should be completed.

1 Week In Advance

Any potential COI is resolved by the CE Office.

What if I miss the deadline?

Because disclosure is such an important aspect of our accreditation, we will have to revoke credit for your activity. **In other words, don't miss the deadlines!**