

Instructions for Completing the Disclosure and Resolution of Conflicts of Interest Form for CME Activities



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Harvard Medical School requires that any individual(s) in a position to control the content of an educational activity must disclose all relevant financial relationships prior to their participation. If relevant financial relationships are disclosed, all conflicts of interest must be resolved prior to the beginning of the educational activity. To help us with these requirements, please see instructions on completing the *Disclosure and Resolution of Conflicts of Interest Form* below:

Step 1: To Disclose Relevant Financial Relationships – Section One

1. Complete the information requested for the activity title and date, the name of the individual disclosing the relevant financial relationships, the individual's role(s) in the activity, and content area or title of the presentation. If the individual is serving in multiple roles in the activity, for example, if he/she will serve as a Course Director and also will present at the course, check off the boxes for both Course Director and Faculty/Presenter.
2. Respond to the question of whether the individual and/or his/her spouse/partner have a relevant financial relationship within the last 12 months with any entity producing, marketing, re-selling, or distributing health care goods or services consumed by or used on patients that is relevant or could be impacted by content included in this activity.
3. If yes, check the "yes" box; for each relationship, indicate whether it is the individual or spouse/partner, the name of the commercial interest, the nature of the financial relationship, and the content area of the relationship. You may add additional lines to the grid if necessary or attach a separate document.

Examples of the types of relationships are: employee, ownership interest, (e.g. stocks, stock options or other ownership interest, excluding diversified mutual funds, consultant, contracted research/investigator, membership on boards, advisory committees, or review panels, intellectual property rights, patent holder, royalty recipient, speaker's bureau, etc. After completion of the grid, continue on to the second page, read the attestation statement; sign and date the form on the bottom of the second page. Comments may be made at the bottom of the page if desired.

4. If no, check the "no" box; read the attestation statement on the second page; sign and date the form on the bottom of the second page. Comments may be made at the bottom of the page if desired. Section 2 of the form does not need to be completed.
5. The primary Course Director needs to complete the disclosure information for him/herself, collect disclosure information from all other Course Directors and Activity Planners, and submit the completed forms along with the Activity Proposal to ceproposal@hms.harvard.edu. HMS DCE manages the resolution of conflict of interest process for Course Directors and Activity Planners. If a Course Director or Activity Planner will also be serving as Faculty/Speaker or Moderator or Reviewer during the activity, the resolution section on the form (detailed below) will need to be completed by a designated non-conflicted Course Director or non-conflicted physician.

In addition, the primary Course Director needs to collect the disclosure information from Faculty/Speakers, Moderators, and Reviewers and the *Disclosure and Resolution of COI Forms* must be submitted to HMS DCE *thirty days* prior to the beginning of the CME activity. For RSS activities, Course Directors or Course Administrators will need to submit the forms during the check-in periods or if requested by an HMS DCE staff member. *Disclosure and Resolution of Conflict of Interest Forms* still need to be completed prior to participation in the RSS activity.

Step 2: To Resolve Relevant Conflicts of Interest – Section Two

1. If any information is reported in the disclosure grid by a Faculty/Speaker, Moderator or Reviewer, a *non-conflicted* Course Director(s) or other *non-conflicted* designated physician must review the information and resolve the potential conflict of interest prior to the beginning of the CME activity. You will note that if a relevant financial relationship is reported by a Faculty/Speaker, then the educational content for that session must be reviewed by a non-conflicted Course Director(s) or designated non-conflicted physician to ensure that the content is balanced, promotes improvements in healthcare, and that there is no commercial bias. It is suggested that Course Director(s) request that slide presentations be submitted 4-6 weeks in advance of the educational activity to allow ample time for review.
2. If Faculty/Speaker is an employee of a commercial interest, he/she is required to submit his/her presentation to the Course Director at least 30 days prior to the beginning of the CME activity. A non-conflicted Course Director and/or another physician-appointed representative that does not have any relevant financial relationships, will review the employee's presentation and ensure that it meets the requirements outlined in *the Policy On the Role of An Employee of A Commercial Interest Participating in a CME Activity*.
3. The employee's presentation is also required to be submitted to the HMS Program Coordinator at least 30 days prior to the CME activity for validation and review by HMS DCE.
4. A Course Director or designated non-conflicted physician must complete the appropriate resolution method and check off the appropriate box as documentation on the form. More than one resolution method may be appropriate and may be utilized for the process.
5. After completing the resolution of conflict of interest process, the Course Director or designated non-conflicted physician needs to print and sign his/her name, indicate his/her role, sign and date the form, and include his/her e-mail address. The completed forms should be sent by the Course Director to your assigned Program Coordinator at HMS DCE *at least 30 days* prior to the beginning of the CME activity. Please review all forms prior to submission to HMS DCE. Incomplete forms will not be accepted, and will be returned to the Course Director or Course Administrator for completion.
6. Please note that if HMS DCE does not receive the *Disclosure and Resolution of Conflicts of Interest Forms* by the designated time, HMS DCE reserves the right to rescind *AMA PRA Category 1 Credit*[™] for the activity.