

## **The four components of Disclosure (Element 3.3) for CME activities:**

### **1. Reporting**

- Reporting disclosure **MUST** occur in advance of the activity.
- The first step in reporting is accomplished when the presenter completes, signs and dates a disclosure form at least two weeks prior to the activity for each lecture that he/she will be presenting. This will allow time for review and management of any potential conflicts of interest.
- Obtaining the signed disclosure form immediately prior to a lecture/presentation does not allow sufficient time for management and is actively discouraged.

### **2. Management of disclosure**

- Review, management and resolution of conflict of interest should occur upon receipt of the signed disclosure form from the presenter.
- Acceptable management strategies are outlined in the attached Resolution of Conflict of Interest policy.

### **3. Disclosing to the audience in advance**

- Disclosing to the audience must occur prior to the learning.
- Presenters must disclose all relationships that are relevant to their lecture. This includes disclosing that they have no relevant financial relationships.
- When presenters disclose relationships they must include the name of the commercial entity and the nature of the relationship. Dollar values are not presently required.

### **4. Documentation**

- The documentation file must contain the following components:
  - Completed, dated, and signed disclosure form from each presenter.
  - Documentation of resolution/management of conflict of interest when applicable.
  - Evidence of communication of disclosure information to the learners, i.e. including a copy of the disclosure slide, poster, disclosure summary page, etc., in the paper file.