

Johns Hopkins School of Medicine
OFFICE OF CONTINUING MEDICAL EDUCATION (OCME)

Policy on Disclosure of Relationships between Commercial Entities and Educational Faculty

Johns Hopkins OCME requires written, signed disclosure of the existence of relevant¹ financial interests or relationships with commercial interests² from any individual³ in a position to control the content of a CME activity accredited by OCME. Individuals who refuse to disclose relevant financial relationships ***will be disqualified*** from serving as a planning committee member, a teacher, a speaker, a moderator or an author of the educational activity nor will such individuals have control of or the responsibility for the development, management, presentation or evaluation of the CME activity.

Relevant interests or relationships include, but are not limited to, the following:

- Consultant/Advisor
- Direct Grant/Research Funding⁴
- Speakers Bureau membership
- Stock holdings (excluding diversified mutual funds)
- Other
 - Ownership interest
 - Employment (including Board positions)
 - Royalties
 - Intellectual property rights
 - Honoraria (excluding funds received for faculty participation in accredited CME activities)

All relevant financial interests or other relationships with commercial interests must be disclosed to participants of the activity *prior to the beginning of the educational activity*. The disclosure statement must include the individual's name, the name of the commercial interest(s), and the nature of the relevant relationship the individual has with each commercial interest. It should be noted that although simple disclosure remains necessary it is no longer deemed sufficient.

For an individual with no relevant financial or other relationship(s) with commercial interests, the participants must be informed prior to the beginning of the educational activity that the individual has no relevant financial or other relationship(s) with commercial interests.

The purpose of the OCME Policy on Disclosure of Educational Planners and Commercial Entity Relationships is not to prevent an individual with relationships with or interests in commercial entities from participating in an educational activity, but to help OCME identify and resolve any potential conflicts of interest and to inform the participants that such relationships exist. Variation from the above policy will be considered on a case-by-case basis by the OCME in conjunction with the Advisory Board.

Definitions

1. “Relevant” financial interests or relationships are defined as receipt of funds (money, gifts, travel, directly purchased stock) by the individual (and his/her spouse, partner or immediate family) in any amount over the past 12 months directly from a commercial interest whose products or services are discussed in or pertain to the content of the educational activity. For purposes of OCME identification and resolution of conflicts of interests, disclosure of “relevant” financial interests or relationships will be further delineated as “past” (any interests or relationships in the 12 months prior to the last 12 months) and “current” (any interests or relationships in place and/or active at the time of the individual’s involvement in the CME activity or in place during the last 12 months) and will be requested from individuals on the Financial Disclosure form.
2. “Commercial interests” are defined as any proprietary entity producing health care goods or services consumed by, or used on patients, with the exemption of non-profit or government organizations or non-health care related companies.
3. “Individuals” are defined as persons (and their spouse, partner or immediate family⁵) who are in a position to control the content of the educational activity. Such individuals include, but are not limited to: Editorial positions for CME activities, Planning Committee member, freelance writer, author, JHM employee, contributor, joint sponsor personnel, and vendor.
4. “Direct Grant/Research Funding” is defined as funds that are directly received from a commercial entity by an individual for research or clinical trials and/or educational purposes. Grant/research funds received from commercial entities by a medical institution or medical university/school that are in turn used to pay individuals for research or clinical trials that are part of the individual’s employment with the medical institution or medical university/school will not be considered “direct” funding and will not need to be disclosed by the individual or to activity participants.
5. Immediate family is defined at a minimum by minor children. The individual filling out the report is permitted to be more encompassing if they believe a potential relevant conflict exists.

Policy approved on April 18, 2005 by the OCME Advisory Board.