

Johns Hopkins University School of Medicine
OFFICE OF CONTINUING MEDICAL EDUCATION
Policy on Speaker Disclosure of Relationships with Industry



Johns Hopkins Office of Continuing Medical Education (OCME) requires electronic or written, signed disclosure of the existence of relevant financial relationships¹ with industry² from any individual³ in the role of Speaker, Presenter or Moderator for an OCME accredited activity. Individuals who refuse to disclose these relevant financial relationships *will be disqualified* from serving as a Speaker, Presenter or Moderator for the educational activity.

Financial relationships include, but are not limited to, the following:

- Consultant/Advisor
- Grant/Research Funding⁴
- Patent Royalty / Intellectual property rights
- Ownership Interest (equity, stock options or directly purchased stock excluding mutual funds)
- Honorarium (except funds received for faculty participation in accredited CME activities)
- Speakers' Bureau⁵ membership
- Paid member of Committees, Panels or Boards
- Employment

It should be noted that although simple disclosure remains necessary, it is no longer deemed sufficient. The purpose of the OCME Policy on Speaker Disclosure of Relationships with Industry is not to prevent an individual who has relationships with industry from participating in an educational activity, but to help OCME identify and resolve any potential conflicts of interest. Variation from the above policy will be considered on a case-by-case basis (Rebuttable presumption) by the OCME in conjunction with the Advisory Board and the process and decisions will all be documented. Variation in policy is not permitted for those that refuse to disclose.

¹ "Relevant financial relationships" are defined as receipt of funds or "gifts-in-kind" by the individual (and his/her spouse/partner or immediate family) in any amount over the past 12 months or in the upcoming months, or for a Principal Investigator or an individual named in grant/research funding to that individual or his/her institution, employer or hospital directly from industry whose product or service is relevant to the presentation being given.

² "Industry" is defined as any proprietary, for-profit commercial entity producing, marketing or distributing health care goods or services consumed by or used on patients. Non-profit or government organizations or non-health care related companies are not considered industry.

³ "Individuals" are defined as persons (and their spouse/partner or immediate family members) who are in a position to control the content of the educational activity. Such individuals include, but are not limited to: activity directors, editorial positions for CME activities, planning committee member, speaker, freelance writer, author, JHM employee, contributor, joint sponsor personnel, and vendor.

⁴ "Grant/Research Funding" is defined as funds that are received from industry for research or clinical trials and/or educational purposes. The Principal Investigator or any named individual in a grant is considered to have a conflict of interest that requires disclosure and management whether the funds were received directly by that individual or by his/her institution, employer or hospital. Funds from a grant 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 and for which they were not a named individual in the grant will not be considered a conflict of interest and will not need to be disclosed by the individual or to activity participants.

⁵ Activities with any of the following characteristics are considered participation in a Speakers' Bureau whether or not it is labeled as such:

- a) A company has the contractual right to dictate what you say
- b) A company (not you) creates the slide set (or other presentation materials) and has the final approval for all content and edits
- c) You receive compensation from the company and act as the company's employee or spokesperson for the purposes of dissemination of company-generated presentation materials

Policy approved on December 15, 2009 by the OCME Advisory Board.