

Purpose

In accordance with the ACCME's Standards for Commercial Support of Continuing Medical Education, the Policy on Disclosure exists to provide guidance for staff, faculty and joint providers of the requirement of faculty members, planners and managers involved in the development of the content of a CME activity to disclose specific information regarding financial relationships as well as discussion of unlabeled/unapproved uses of drugs or products in their presentation.

Policy

- NYU SOM discloses discussion of unlabeled use as well as all relevant financial relationship(s) maintained by anyone in a position to control the content of a CME activity to the audience prior to the beginning of the educational activity, including the individual's name, name of the commercial interest, and the nature of the relationship. Should a person have no relevant financial relationships, that fact will also be disclosed (ACCME SCS 6.1-6.2). [See Policy on Collection and Resolution of Conflict of Interest and Policy on Standards for Commercial Support].
 - **Financial Relationships.** Faculty members, planners and managers involved in the development of the content of a CME activity are required to disclose to NYU SOM (and in turn NYU SOM must disclose to learners) any relevant financial relationship between themselves and or their spouse/partners and ANY commercial interest whose products or services might be discussed in the CME activity. "Financial relationship" is defined as the receipt of any amount within the past 12 months. If instructors have nothing to report, that information must be reported to NYU SOM and disclosed in the course materials. If a faculty member, planner, or instructor has refused to disclose his/her relationships, they will be disqualified from participating in the activity.
 - **Discussion of Unlabeled Use.** Faculty must disclose to NYU SOM and in turn NYU SOM must disclose to learners, preferably in writing through course materials, that a product is not labeled for the use under discussion or that the product is still investigational.
- Faculty members, planners and managers involved in the development of the content of a CME activity will complete and submit NYU SOM's Financial Disclosure and Activity Disclosure forms online prior to participation in the activity. At a minimum that form contains the following information:
 - The forms shall note the title and date of the activity.
 - The Financial Disclosure form shall solicit information about financial relationships the individual or their spouse/partner has with any commercial interest within the past 12 months; if none, there shall be a button to select to that effect.
 - The Activity Disclosure form shall inquire as to whether the CME content over which the individual has control over contains any information about products or services of any of the identified commercial interests.
 - The Activity Disclosure form shall also inquire as to whether the individual intends to discuss unlabeled or unapproved uses of drugs or devices in his or her presentation.