

## Outline to Explain Identification Mitigation and Disclosure of Financial Relationships Process

### A. Identification and Mitigation of Financial Relationships Form (**Appendix A, pgs. 2-8**) (to be completed prior to the activity)

**Anyone** (Chair of a Planning Committee, Member of a Planning Committee, Speakers, Authors, Staff, etc.) who has the ability to control content of an activity must complete an **Identification, Mitigation, and Disclosure of Financial Relationships and Copyright Permissions form (Appendix A, Pg.1)**. If a relevant COI is identified, it must be mitigated according to the person's role in the activity. Disclosures of all Planning Committee Members must be obtained and mitigated prior to or at the first planning committee meeting.

1. If the **Chair of the Planning Committee** reports or discloses potential COI, the committee as a whole must address the importance and determine if there is relevance to the focus of the activity by completing the **Identification and Mitigation of Financial Relationships form (Appendix A, pgs. 2-8)**. If there is no resolution the chair must recuse him/herself. If the relationships/affiliations and content of the activity are incongruent there is no further action. Explicit documentation (minutes, letter, etc.) of the process must be submitted with the CME Application.
2. If a **Member of the Planning Committee** reports or discloses potential COI, the Chair of committee must address the importance and determine if there is relevance to the focus of the activity by completing the **Identification and Mitigation of Financial Relationships form (Appendix A, pgs. 2-8)**. If there is no resolution, the committee member must recuse him/herself. If the relationships/affiliations and content of the activity are incongruent there is no further action. Explicit documentation (minutes, letter, etc.) of the process must be submitted with the CME Application.
3. If the **Chair of the Planning Committee** or a **Member of the Planning Committee** refuses to complete the disclosure form, they will be prohibited from participating in any portion of planning of the activity.
4. After the **Identification and Mitigation of Financial Relationships form (Appendix A, pgs. 2-8)** is completed, it is sent to the CME Office for review and final approval.
5. Any **Speaker, Author, Moderator, Facilitator, Staff, etc.** will be required to complete an **Identification, Mitigation, and Disclosure of Financial Relationships and Copyright Permissions form (Appendix A, Pg.1)**. If a relevant financial relationship(s) is disclosed, it must be mitigated prior to the activity. The Physician Champion, the Chair, or a member of the planning committee will address the importance and relevance to the focus of the activity by completing the **Identification and Mitigation of Financial Relationships form (Appendix A, pgs. 2-8)**. If the relationships/affiliations and content of the activity are incongruent there is no further action. If a COI is identified, a review of instructional materials (slides, handouts, etc.) is required. If there is no resolution, the person must recuse him/herself. Explicit documentation (minutes, letter, etc.) of the process must be submitted.

All disclosures: those with and those without a COI along with the resolutions must be provided to the participants prior to the activity.

Example Documentation	
November 11, 2021	
<u>Members present:</u> John Wilson, MD – Infectious Disease; Bill Jones, MD, Chair – Emergency Medicine; Bob Smith, MD – Internal Medicine; Alice Johnson, PhD – Office of Professional Development; Hank Ross, MD – Family Medicine	
<u>Discussion:</u> Dr. Wilson reported relevant relationships with an entity producing, marketing, selling, re-selling or distributing health care goods or services consumed by or used on patients. Pfizer (Consultant) Merck (Speaker's Bureau) All reported relevant financial relationships have been identified and mitigated.	

### B. Annual Conflict of Interest (COI) Disclosures & Identification and Mitigation of Financial Relationships Form (**Appendix A, pgs. 2-8**)

- If an \*Annual Disclosure (e.g., RSS - Medical Grand Rounds) expires, **anyone** (Chair of a Planning Committee, Member of a Planning Committee, Speakers, Authors, Staff, etc.) who has the ability to control content of an activity must complete a new **Identification, Mitigation, and Disclosure of Financial Relationships and Copyright Permissions form (Appendix A, pg. 1)**. If the content **did not or will not change**, the prior **Identification and Mitigation of Financial Relationships form (Appendix A, pgs. 2-8)** may be copied and attached to the new disclosure. (\*Note: RSS Disclosures are valid for only one year.)