

# THE CONTINUING EDUCATION COORDINATOR'S BULLETIN

INFORMATION AND IDEAS FROM THE INDIAN HEALTH SERVICE CLINICAL SUPPORT CENTER

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*This issue marks the revival of the BULLETIN after several years of inactivity. There are several subjects that need to be addressed in the next few months, so look for a number of issues to be published soon. Of course, back issues are always available by contacting our office (see the back page of this issue) or by looking in the IHS website (www.ihs.gov). We have attached a list of the subjects that have been covered in the past.*

## REVISED FACULTY DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST

For all continuing education activities sponsored by any accredited sponsor for physician continuing medical education credit, there is a requirement for all faculty members to complete a "Disclosure" form, and for the information obtained from that form to be conveyed to those attending an activity.

The purpose of this disclosure process is to assure that those who attend will be aware of any financial or other relationships between any faculty member and any manufacturers of any commercial products discussed in any presentation. This only makes sense; it is important for those listening to a presentation to be able to judge whether or not any such relationship might create any commercial bias.

As most of our coordinators know, the way this is accomplished is to ask each faculty member, when they agree to speak, to read, complete, and sign the form. The information obtained from these forms should then be shared with the audience in writing in the preconference publicity and/or verbally at the time of their introduction.

In the past we have only asked that there be disclosure when there is a significant financial relationship. It has come to our attention that **there must be disclosure whether or not any relationship exists**; that is, there must be a disclosure statement for every faculty member, even if there are no relationships.

The easiest way to accomplish this is to include a statement in the preconference publicity and/or on the faculty list distributed with the course materials at the start of the activity that states something to the effect that "Dr. Jones is on the speaker's bureau for Company A, and Dr. Smith has a research grant from Company B to study the epidemiology of Parkinson's Disease in minority populations. All other faculty members have indicated that they have no significant financial or other relationships to disclose." The fact that any faculty member has refused to disclose whether or not there are any relationships must also be communicated to the participants (see attached sample Faculty List).

Even when this information is given in the preconference announcements or in the course materials, it is a good practice to repeat the announcement of any significant relationships verbally when the presenter is introduced.

For an ongoing series of one-hour presentations, it is permissible to simply communicate this information verbally at the time of the speaker's introduction. The fact that this took place must be documented by checking the box at the bottom of the Disclosure form.

There are two additional standards that we can meet using the disclosure process. Presentations must give a balanced view of therapeutic options. Faculty use of generic names will contribute to this impartiality. If trade names are used, those of several companies should be used rather than that of a single company. When an unlabeled or investigational use of any product is discussed during an educational activity, the speaker must so identify this use. We have added a statement to the "Disclosure" form that indicates that the speaker understands and will abide by these standards (see revised Disclosure form, attached).

As the accredited sponsor of your activity, we are required to be able to show that disclosure took place for every speaker for every activity. While there is a space at the bottom of the "Disclosure" form for you, as the coordinator, to check to indicate that disclosure of the information from the form took place, we are also asking you to submit copies of the actual disclosure statements that the participants received in the preconference publicity or course materials. While checking the box on the "Disclosure" form indicating that this took place verbally for one-hour presentations is acceptable, we would expect that for any other conferences

there would be submitted the actual written statements that the participants receive. Please understand that simply sending us the completed forms will no longer suffice.

## THE BOTTOM LINE . . .

Disclosure is required of all presenters at all activities sponsored for continuing medical education. As on-site coordinators, you are obligated to convey the information learned from the completed forms to the participants, and to submit documentation of this for the permanent records of the activity. This documentation process serves a useful purpose in that it assures that we will be aware of any potential conflicts of interest, and more importantly, assures that the audience will know about it. As in health care, "if it isn't in the record, it didn't happen, and so documentation of the way the participants were informed is equally important. This same disclosure process can also help us assure that all presenters inform the audience about off label and investigational uses of medications, and encourage the use of generic rather than trade names. Attached is a new, revised "Disclosure" form that will help us accomplish all of this, with your assistance.

If you are not on the mailing list for this *Bulletin* or wish to receive any back issues, please call us at 602-364-7777 or write to:

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