

CME Policy and Procedures for Full Disclosure and Identification and Resolution of Conflicts of Interest

The following policy governs all **North American Primary Care Research Group (NAPCRG)**-produced CME activities:

1. Disclosure of Financial Relationships

The existence of any financial relationship or interest an individual in a position to influence/control content currently has, or has had, within the last year must be disclosed in writing to learners prior to presentation. Disclosure information must be received and reviewed by NAPCRG prior to confirmation of the individual's participation. Any conflicts of interest must be identified and resolved prior to the individual's confirmation as an activity faculty or other content-influencing/controlling role.

The intent of this policy is not to prevent individuals from participating, but rather is to identify and resolve any conflict of interest. Should resolution be impossible, a replacement for the individual must be chosen.

Because the review, identification, and resolution process must take place prior to the activity, all individuals in a position to influence/control content must return the disclosure information by the due date. Additional clarification is asked of those who participate in Speakers' Bureaus to assist **NAPCRG** reviewers in understanding the nature of your Speakers' Bureau relationship (a list of recommended speakers acting independently of any guidance or direction from a commercial entity versus a list of speakers who are acting as agents, or who are contractually bound as agents of the commercial entity) in order to assure that your participation will not be in conflict with previous commitments. The disclosure will be reviewed and, should a conflict be identified, additional information or dialogue may be required. Failure to disclose within the necessary timeframe will result in withdrawal of the invitation to participate.

Acknowledgement of all disclosures—i.e., nothing to disclose or existence of affiliation(s), and/or financial relationship(s) or interest(s)—for every individual who serves in a position to influence/control content of the educational activity must be presented in writing to the learners.

2. Disclosure of Unlabeled/Investigational Uses of Products

Faculty must disclose to **NAPCRG** and the learners when an unlabeled use of a commercial product, or an investigational use not yet approved for any purpose, is discussed during an educational activity. Faculty must disclose that the product is not labeled for the use under discussion or that the product is still investigational.

The intent of this policy is not to prohibit or limit the exchange of views in scientific and educational discussions, including discussions of unapproved uses, but to ensure that faculty discloses to learners that such discussion will take place.

Should an unplanned discussion of unlabeled or investigational uses of a product occur (usually in the course of a question and answer session), it is the responsibility of the faculty member to inform the learners that the use under question/discussion is unlabeled or investigational prior to answering the question or responding to the discussion point.

Acknowledgement of planned discussion of unapproved or investigational uses of products must be presented in writing to the learners prior to the start of the activity, or (for enduring materials) at the point that first mention is made of the unapproved/investigational use in the activity.

3. Failure or Refusal to Disclose/False Disclosure

Failure or refusal to disclose, false disclosure, or inability to work with **NAPCRG** to resolve an identified conflict of interest will result in withdrawal of the invitation to participate and replacement of the faculty/planner.

4. Identification and Resolution of Conflicts of Interest

- A. **NAPCRG** will inform all individuals who are invited to serve in roles that may impact the content of an educational activity (faculty, planners, authors, editors, reviewers, staff, etc.) of the **NAPCRG** Policy on Full Disclosure. Disclosure forms and due dates will be distributed with the invitation to serve. Confirmation of service is contingent upon return and review of disclosure information and resolution of any conflicts of interest.
- B. Each individual faculty/planner/author/editor/reviewer/staff must complete and return his/her disclosure paperwork. **NAPCRG** will proceed through a review of the submitted information and, should any of the disclosed information trigger a concern regarding a possible conflict of interest, reviewers may seek input from the candidate and/or other individuals prior to confirming the candidate's service.
- C. Should no conflict of interest be identified, the individual may be confirmed in their role in the activity.
- D. Should a conflict of interest be identified, the individual will be contacted and asked for clarification or additional information. Upon receipt and review of this additional information, methods of resolution will be identified and discussed with the individual. Resolution methods may include, but not be limited to, one or more of the following:
 - Assuring valid content through:
 - o Evidence-based content using best available, highest strength of evidence
 - o Peer review of content prior to the activity; activity faculty must be responsive to revision requirements*

- Assigning a different topic for the individual
- Assigning a different faculty for a topic
- Cancellation of the faculty

E. On-site and post-program audits may be conducted at random to ensure **NAPCRG** CME activities for Prescribed credit are unbiased and reflect fair balance.

*The **North American Primary Care Research Group** considers independent peer review for evidence-based content appropriate action to resolve conflict of interest on the part of speakers and authors.