



# COMPLETE DISCLOSURE

SEE BELOW FOR THE STEPS TO COMPLETE YOUR DISCLOSURE OF FINANCIAL RELATIONSHIPS IN CLOUDCME.

All those in control of content for an accredited continuing education activity must complete a disclosure of all financial relationships with ACCME-defined ineligible companies in the 24 months leading up to the start of the activity.

These steps will walk through that process in CloudCME, the software that University of Utah Health's CME office uses.

## DISCLOSURE LINK

Please complete disclosure here: [Disclosure Form](https://uofuhealth.cloud-cme.com/Form.aspx?FormID=41)  
<https://uofuhealth.cloud-cme.com/Form.aspx?FormID=41>

Or, scroll down to the bottom of [University of Utah CloudCME page](#), click on **Disclosure Form** in the footer.



## Sign-in:

- If you are a University of Utah Health employee with a UID, use **Single Sign-On and your UID login**.
- If you do not have a UID, use "Sign in with your email and password".
  - If you do not yet have an account in the University of Utah Health CloudCME (& you don't have a UID), please create one: click "Create Account" and use your email to create an account.
  - If you can't remember your password, please use the "forgot password" option. (Note: for Single Sign-on users, you'll need to reset your University password & our "forgot password" option will not work.)

The disclosure form will load from the link above. Or you can find it on the **To-do Tasks** tab.




Click **Begin or Update** on your Global Disclosure of Financial Relationships task.

## COMPLETING DISCLOSURE

**Scroll** through the form, reading and **answering all questions**.  
**Sign and Submit** once you've completed all questions.

- If you need to **add more than one relationship**, use the tiny green plus arrow just above the relationships box for more rows.

To add additional relationships, click the green plus sign. You can remove a relationship by clicking the red minus sign.

Please specify your relationship:   



Once you're done entering relationships, click **Yes** to the Attestation questions. Enter your **Name** and the **Date** you are completing the form.

Click **Submit**.



Once you submit, if you need to Update your relationships, you may return here at any time and click **Update**.

## BACKGROUND INFORMATION FOR THE QUESTIONS

Everyone in a position to control the content of a CME activity must disclose to UUCME and to the learners; all his/her financial relationships must be mitigated PRIOR to the activity.

Please disclose all relationships you have or expect to have within the 24 months leading up to your presentation(s) or control of content for the activity, any financial relationship with any company whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients (an ineligible company).

Please do include:

- ALL relationships with ineligible companies, even if you think it is not relevant to the content of the activity.
- All relationships regardless of the amount (there is no minimum financial threshold).
- All your relationships for 24 months prior to the activity.

Typical financial relationships types include, but are not limited to:

- Researcher, grant, independent contractor (PI or named in the grant, including contracted research)
- Consultant/advisor,
- Speaker (ex. Speaker's Bureau),
- Royalties or patent beneficiary,
- Executive role,
- Stock options,
- Employee Ownership interest (equity, stock, excludes mutual funds),
- Other (please explain)

If you are a founder/equity owner/employee of a bio-tech or start-up company (perhaps spun-off from your University work), please include this as a financial relationship.

- If you receive a salary from that company, the type of relationship is of an employee.
- If you are a founder with a financial interest in the company, the type of relationship is of an owner.

- If you have equity, stock ownership or other investment in the company, you have ownership interest.

Please note that there are strict restrictions for employee/owners (see DEFINITIONS) and their involvement in CME activities. If you have questions or aren't sure what to include, please include your best description and/or follow-up with us at [CME.Office@hsc.utah.edu](mailto:CME.Office@hsc.utah.edu).

## VIDEO RESOURCE: PURPOSE, PROCESS AND DEFINITIONS

Check out [this four-minute video](#) from the ACCME explaining the purpose, process and definitions of disclosure. (<https://www.vimeo.com/accme/faculty>)

## PURPOSE & TIPS

Since healthcare professionals serve as the trusted authorities when advising patients, they must protect their learning environment from industry influence to ensure they remain true to their ethical commitments. Many healthcare professionals have financial relationships with ineligible companies. By identifying and mitigating relevant financial relationships, we work together to create a protected space to learn, teach, and engage in scientific discourse free from influence from organizations that may have an incentive to insert commercial bias into education.

UUCME, accredited by the ACCME, reminds you that the ACCME Standards for Integrity and Independence in Accredited Continuing Education, applicable to accredited continuing education across the health professions, are designed to:

- Ensure that accredited continuing education serves the needs of patients and the public.
- Present learners with only accurate, balanced, scientifically justified recommendations.
- Assure healthcare professionals and teams that they can trust accredited continuing education to help them deliver safe, effective, cost-effective, compassionate care that is based on best practice and evidence.
- Create a clear, unbridgeable separation between accredited continuing education and marketing and sales.

Consider using the following best practices when presenting clinical content in accredited CE:

- Clearly describe the level of evidence on which the presentation is based and provide enough information about data (study dates, design, etc.) to enable learners to assess research validity.
- Ensure that, if there is a range of evidence, that the credible sources cited present a balanced view of the evidence.
- If clinical recommendations will be made, include balanced information on all available therapeutic options.
- Address any potential risks or adverse effects that could be caused with any clinical recommendations.

Although accredited CE is an appropriate place to discuss, debate, and explore new and evolving topics, presenting topics or treatments with a lower (or absent) evidence base should include the following strategies:

- Facilitate engagement with these topics without advocating for, or promoting, practices that are not, or not yet, adequately based on current science, evidence, and clinical reasoning
- Construct the activity as a debate or dialogue. Identify other faculty who represent range of opinions and perspectives; presentations should include a balanced, objective view of research and treatment options.
- Teach about the merits and limitations of a therapeutic or diagnostic approach rather than how to use it.
- Identify content that has not been accepted as scientifically meritorious by regulatory and other authorities, or when the material has not been included in scientifically accepted guidelines or published in journals with national or international stature.
- Clearly communicate the learning goals for the activity to learners (e.g., “This activity will teach you about how your patients may be using XX therapy and how to answer their questions. It will not teach you how to administer XX therapy”).

## DEFINITIONS

### **Ineligible Company**

An ineligible company, as defined by ACCME, is a company whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. The ACCME does not consider providers of clinical service directly to patients, government agencies, or medical practices to be ineligible companies. (The University, Intermountain, the VA, NIH, for example, are not ineligible companies.)

Ineligible companies do include (examples):

- Bio-medical startups that have begun a governmental regulatory approval process
- Compounding pharmacies that manufacture proprietary compounds
- Device manufacturers or distributors
- Growers, distributors, manufacturers or sellers of medical foods and dietary supplements
- Manufacturers of health-related wearable products
- Pharmaceutical companies or distributors

### **Financial relationships**

Individuals must disclose regardless of their view of the relevance of the relationship to the education. There is no minimum financial threshold; we ask that you disclose all financial relationships, regardless of the amount, with ineligible companies. Inherent in any amount is the incentive to maintain or increase the value of the relationship.

Funded research is a financial relationship you should include. If you are a named investigator on a research grant from a pharmaceutical or device company or its parent company (or any company that fits the ineligible company definition), you should answer

"yes" to the disclosure question, that you do have financial relationships. If the grant is from the NIH, CDC, VA or other governmental entity, this is NOT considered an ineligible company and you should answer "no" that you do not have financial relationships.

Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.

Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed.

### **Owners and Employees of Ineligible Companies**

The owners and employees of ineligible companies must be excluded from controlling content or participating as planners or faculty in accredited education, except in rare, limited and specific circumstances. Owners and employees are individuals who have a legal duty to act in the company's best interests.

Owners are defined as individuals who have an ownership interest in a company, except for stockholders of publicly traded companies, or holders of shares through a pension or mutual fund. Employees are defined as individuals hired to work for another person or business (the employer) for compensation and who are subject to the employer's direction as to the details of how to perform the job.