

CME Policy-Verification of Verbal Disclosure (effective immediately)

CME 2004 Policy - Verification of Verbal Disclosure: *If Disclosure is not obtained before the event date*-Written verification that appropriate verbal disclosure occurred at a CME activity with respect to the documentation of verbal disclosure at CME activities:

1. A representative of the provider (chair, moderator) who was in attendance at the time of the verbal disclosure must attest, **in writing**:
 - a. that verbal disclosure did occur; and
 - b. itemize the content of the disclosed information (ACCME Policy 2000-B-14); or that there was nothing to disclose (ACCME Policy 1999-A-16); or that the faculty member had refused to disclose (ACCME Policy 1999-A-17).

The documentation that verifies that adequate verbal disclosure did occur must be completed within one month of the activity.

Evidence or documentation that verbal disclosure took place must be detailed enough to demonstrate that all pieces of disclosure were actually made to the learner.

The following two strategies demonstrate compliance with this policy.

STRATEGY #1

A written attestation by the activity moderator, observer or provider staff member, that is signed and dated within a week of the activity, states that all relevant disclosure information was made known to the participants. Stapled to the attestation is the full detail of the information that was disclosed. The **faculty disclosure form** is required for this purpose.

STRATEGY #2

A written attestation by MUJCESOM CME Dean, that is signed and dated on the date of the activity, that attests and delineates all the disclosure information that was verbally made known to the participants, including faculty members' names, the nature of their relationships, the entities with which they have relationships, if any of the faculty had nothing to disclose or refused to disclose.

Reference ACCME Policy 2003-B-12.