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## **Instructions for Persons in a Position to Control Activity Planning and Content Explaining the Collection of Financial Relationship Information**

Dear \_\_\_\_\_:

### **Why am I receiving this communication?**

The National Medical Association is accredited by the Accreditation Council for Continuing Medical Education (ACCME). We appreciate your help in partnering with us to create high-quality education that is independent of industry influence, in accordance with ACCME Standards. In order to participate as a person who will be able to control the planning or the educational content of this accredited activity, we ask that you disclose ALL financial relationships that you have had over the past 24 months with any “ineligible companies” (formerly called “commercial interests”). We define ineligible companies as those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. (See below for examples of ineligible companies.)

You DO NOT need to disclose financial relationships with ACCME-defined “eligible organizations” (see below for definition and examples of eligible organizations).

There is no minimum financial threshold; you must disclose all financial relationships with ineligible companies, regardless of the amount. We ask you to disclose regardless of whether or not you view a financial relationship as “relevant” to the educational activity. Based on an analysis of all of your financial relationships with ineligible companies, NMA will decide which are relevant.

### **Why do we collect this information?**

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.

### **What are the next steps in this process?**

If NMA determines that any of your financial relationships are relevant to the educational activity, we will take steps to mitigate those relationships. Please note that the identification of relevant financial relationships does not necessarily mean that you are unable to participate in the planning and implementation of this educational activity. Rather, ACCME Standards require that relevant financial relationships be mitigated before you assume and perform your role in this activity.

To help us meet these expectations, please use the “Disclosure of Financial Relationships” form to share all financial relationships you have had with ineligible companies during the past 24 months, as well as the nature of those relationships (see below for examples of relationships). This information is necessary in order for us to be able to move to the next steps in planning this educational activity. Persons who refuse or fail to submit a complete and accurate form in a timely manner will be prohibited from participation in the planning or implementation of this activity.

IMPORTANT NOTE: ACCME Standards severely restrict the use of employees of ineligible companies and owners of privately-held ineligible companies from participation as planners and presenters in accredited educational activities. Should you indicate on the form that you fall into one of these categories, NMA will inform you of your eligibility to participate in this activity.

Please complete, attest, and submit this form via email to [cme@nmanet.org](mailto:cme@nmanet.org) by \_\_\_\_\_.

If you have questions about these expectations please contact us at 202.347.1895 or via email [cme@nmanet.org](mailto:cme@nmanet.org).

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Examples of ***Ineligible Companies*** (formerly called “Commercial Interests”)—You **MUST** disclose financial relationships with these types of companies:

- Advertising, marketing, or communication firms whose clients are ineligible companies
  - Bio-medical startups that have begun a governmental regulatory approval process
  - Compounding pharmacies that manufacture proprietary compounds
  - Device manufacturers or distributors
  - Diagnostic labs that sell proprietary products
  - Growers, distributors, manufacturers or sellers of medical foods and dietary supplements
  - Manufacturers of health-related wearable products
  - Pharmaceutical companies or distributors
  - Pharmacy benefit managers
  - Reagent manufacturers or sellers
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Definition and examples of **Eligible Organizations**—You are **NOT** required to disclose financial relationships with these organizations:

Definition: Eligible Organizations are those whose mission and function are:

- (1) providing clinical services directly to patients; or
- (2) the education of healthcare professionals; or
- (3) serving as fiduciary to patients, the public, or population health

Examples of such organizations include:

- Ambulatory procedure centers
- Blood banks
- Diagnostic labs that do not sell proprietary products
- Electronic health records companies
- Government or military agencies
- Group medical practices
- Health law firms
- Health profession membership organizations
- Hospitals or healthcare delivery systems
- Infusion centers
- Insurance or managed care companies
- Nursing homes
- Pharmacies that do not manufacture proprietary compounds
- Publishing or education companies
- Rehabilitation centers
- Schools of medicine or health science universities
- Software or game developers

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Examples of financial relationships include:

- Researcher
- Consultant
- Advisor
- Speaker
- Independent contractor (including contracted research)
- Royalties
- Patent beneficiary
- Ownership interest: Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed.
- 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.

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**CONTINUING MEDICAL  
EDUCATION DEPARTMENT**



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## DISCLOSURE OF FINANCIAL RELATIONSHIPS

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**Title of Activity:**

**Date of Activity:**

**Name of Person in Control of Content or Planning:**

**Role(s) of Person in Planning or Implementation of the Activity (indicate all that apply):**

presenter  
author  
moderator  
planner  
activity director  
content reviewer  
NMA staff  
NMA contractor  
other (specify)

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In accordance with the Accreditation Council for Continuing Medical Education's Standards for Integrity and Independence, all persons who control the planning and/or content of accredited continuing education are required to disclose to the accredited provider ALL of their **financial relationships** with "ineligible companies" (formerly known as "commercial interests"). An ineligible company is defined as:

"Those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients."

Please complete the following steps:

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**STEP 1:** In the past 24 months, have you had a financial relationship of any kind and in any amount with an ACCME-defined ineligible company?

If Yes, proceed to STEP 2.

If No, attest to the accuracy of your statement in STEP 5 and submit via email to [cme@nmanet.org](mailto:cme@nmanet.org).

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**STEP 2:** Are you an **employee** of an ineligible company? NOTE: NMA policy excludes employees of ineligible companies from participation in accredited educational activities as planners or presenters except under very rare circumstances.

If No, proceed to STEP 3.

If Yes, provide the name of the company, in the text box below and proceed to STEP 3. Per NMA policy, you will be informed of your eligibility to participate in this accredited educational activity.

Employee of the following ineligible company:

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**STEP 3:** Are you an owner (e.g., stock) of any **privately-held** ineligible companies? NOTE: This question does not refer to publicly-traded companies or to ownership through mutual funds. NMA policy excludes owners of privately-held ineligible companies from participation in accredited educational activities as planners or presenters except under very rare circumstances.

If No, proceed to STEP 4.

If Yes, provide the names of those companies, in the text box below and proceed to STEP 4. Per NMA policy, you will be informed of your eligibility to participate in this accredited educational activity.

Owner (stock) of the following privately-held ineligible companies:

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**STEP 4:** Please disclose ALL other financial relationships that you have had in the past 24 months with ineligible companies. There is no minimum financial threshold; we ask that you disclose all financial relationships, regardless of the amount, with ineligible companies. You should disclose all financial relationships regardless of your perceived relevance of each relationship to the educational activity.

For each financial relationship, enter the name of the ineligible company and the nature of the financial relationship(s). Please also indicate if the educational content that you control will be related to the products or business lines of any of the ineligible companies that you have identified. Finally, indicate if the relationship has ended.

Enter the Name of Ineligible Company (see Instructions for definition and examples of ineligible companies)

Enter the Nature of Financial Relationship(s) (see Instructions for examples of relationships)

Will the educational content that you control be related to the products or business lines of the ineligible company?

Has the financial relationship with this company ended?

Additional financial relationships with ineligible companies are listed as an attachment.

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**STEP 5:** I ATTEST THAT THE INFORMATION I HAVE PROVIDED IS ACCURATE AS OF THIS DATE.

Signature:

Date:

Submit completed form via email to [cme@nmanet.org](mailto:cme@nmanet.org)