



# Disclosure FAQs



Frequently asked questions regarding the AAAAI disclosure process.

[Online Disclosure System](#)

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## **What should be disclosed?**

In general, all financial relationships should be disclosed, whether or not you believe there is potential for conflict. There is no minimum financial threshold.

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. 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.

Providing detail on the particular nature of the speaker/ moderator/ planner relationship (i.e. product, disease state, topic area, etc) can help the CCPE to develop a targeted remediation plan. Lack of detail in financial disclosures may lead to a more restrictive plan or inability to participate.

## **Over what period should I disclose?**

All disclosures should include relationships that were active during the previous 24 months. If any of the relationships are still in existence for the current reporting period, then please make sure the "ongoing" box is checked in the appropriate section in the disclosure form.

## **How often should I update my disclosure?**

The AAAAI requires annual updating of an individual's disclosures (by April 30 of each year); however, members are encouraged to update their disclosures whenever a change occurs throughout the year.

## **What is the definition of an ineligible company?**

ACCME defines an ineligible company as an organization whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

## **How will the AAAAI use this information?**

The AAAAI uses the information provided on the disclosure form to determine if any members have significant conflicts with ineligible companies. Any individuals with identified conflicts will need to have those conflicts mitigated before participating as leaders, faculty, or authors for the AAAAI.

### Mitigation Strategies for Speakers/ Moderators

- For disease states that include diagnostics/treatment with multiple options available
  - Focus content of the activity to include recommendations from multiple and balanced sources, citing evidence based medicine
- For disease states that include diagnostics/treatment with limited options available
  - Mitigation: Focus the content of the activity to a report of the data and results of research, without recommendations
- For disease states that don't include discussion of diagnostic/ treatment options
  - Mitigation: Limit the content of the activity to avoid references to the products or services of the ineligible company
- For any relationship with a strong potential for conflict or without adequate detail to mitigate
  - Mitigation: Provide slides/ content for a peer review
- Conflicts that are not resolvable or owners/ employees of ineligible companies
  - Individual may not participate

### Mitigation Strategies for Meeting Planners

- Individual must recuse themselves from involvement in the planning of activities specifically related to the conflict identified.

### **I am in medical practice providing care for profit. Is my practice considered a commercial entity by the AAAAI?**

Physicians performing medical care and medical services, as well as hospital systems or other healthcare provider organizations, are not considered commercial entities or ineligible companies for the purpose of disclosure.

### **I am part-owner of a "Med-Ed" company that contracts with pharmaceutical companies to administer CME educational activities. Am I required to disclose this?**

The AAAAI's position is that income derived from this activity could be perceived as a competing interest and therefore should be disclosed.

### **I receive grant funding from an ineligible company for a research study- where should I disclose this information in the form?**

Use "additional information" and please indicate whether the grant funding is received by you or your institution, and/or what portion of the grant supports your salary.

**I receive funding from the NIH (or another federally funded non-commercial interest), do I need to disclose this?**

Yes, all financial relationships need to be disclosed and the CCPE reviewers will determine what represents a potential conflict or not.

**If I refuse to disclose, what will happen?**

Refusing to disclose will not affect your ability to be a member of the AAAAI; however, it will likely mean that you will not be allowed to participate as a leader, faculty, or author in any AAAAI sponsored event.

**I was on a speaker's bureau last year, but have since resigned. How do I indicate this on the disclosure form?**

You should indicate your membership on the speaker's bureau in section B. Since you have resigned, you should indicate "no" in the ongoing category. You may also choose to indicate in Section D "Additional Information", that you are no longer a member of the speaker's bureau for this company and will have no personal financial gain in the current calendar year or in future years.

**Will the AAAAI release my disclosure information?**

The AAAAI will not release any individual member's financial information. This information is strictly for the confidential use of the AAAAI. However, AAAAI may release a list of individuals and their respective conflicts (without any financial information) and this information will become available in the public domain (i.e. the disclosure list for faculty and leaders in the AAAAI annual meeting program). Participating as a leader, faculty or author for the AAAAI implies that the member agrees to the public release of this information.

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If you have additional questions or concerns, please reach out to the AAAAI Education Team at 414-272-6071 or [cme@aaaai.org](mailto:cme@aaaai.org)