

REAL-TIME VERBAL DISCLOSURE AS REQUIRED BY VHA HANDBOOK 1004.07

Information for Members of VHA Decision Making and Advisory Groups

- A new procedure is mandated by [VHA Handbook 1004.07](#) - Financial Relationships between VHA Health Care Professionals and Industry, which was signed October 21, 2009.
- The procedure involves real-time verbal disclosure of financial relationships with industry that may have a bearing on the work of VHA decision-making and advisory groups.
- The requirement for real-time verbal disclosure applies to the following decision making or advisory groups:
 - (1) MAP
 - (2) VISN Formulary Leaders Committees.
 - (3) VISN Formulary Committees.(d) P&T Committees.
 - (4) Field Advisory Committees
 - (5) VA-DOD Evidence-Based Practice Work Group.
 - (6) Clinical Logistics.
 - (7) Procurement.
 - (8) Technology Assessment.
 - (9) National Leadership Board (NLB).
 - (10) NLB standing committees.
 - (11) VISN-level ELB.
 - (12) Additional decision making or advisory groups as determined by VISN Directors or the Principal Deputy Under Secretary for Health.
- The requirement applies to the chairperson of, members of, and non-member Federal employees invited to attend or make a presentation to these groups.
- Disclosures must include financial relationships that either constitute a conflict of interest or give the appearance of a conflict.
- Financial relationships that require verbal disclosure are about quid-pro-quo situations where you are compensated for a service that you provide to a company. This does not include things like mutual fund holdings where you neither provide a service nor control fund composition. It also does not include financial relationships that your spouse or children may have.
- Examples of relationships that require disclosure:
 - (1) Compensation for participation as a member, presenter, moderator, etc., on an industry-funded speakers bureau.
 - (2) Compensation for participation as an advisor, consultant, member, presenter, moderator, etc., on an industry-funded advisory board.
 - (3) Compensation for participation as an author on an industry-funded publication.
 - (4) Paid expert witness testimony provided on behalf of industry.
 - (5) Industry-funded education or research grants, honoraria, or low interest loans.

(6) Compensation for a paid role (Medical Director, Board Member, Resident or Trainee Representative, etc.) on a pharmaceutical, biotechnology, medical device, product, equipment, or technology company or their proxies.

(7) Compensation for participation as developer, speaker, moderator, attendee, etc., of industry-funded Continuing Medical Education (CME) or other industry-sponsored programs, such as lectures, dinner meetings, or teleconferences.

- Your verbal disclosure must include financial relationships within the last 12 months and any interviews or negotiations within the last 12 months for employment (including anticipated employment) with an entity that has a financial interest in the matters before this board.
- This includes disclosure of financial relationships that you have (or have had in the last 12 months) not only with a manufacturer but also with proxy medical education, publishing, public relations firms, disease advocacy groups, and law firms groups working on behalf of such companies.
- If you have a financial relationship to disclose, you are not required to disclose the amount of compensation you have received but you do need to state that you have a financial relationship, the name of the entity with whom you have the financial relationship, and the nature of the relationship.
- If you have no financial relationships to disclose, you must also make a statement to that effect.
- Examples of the form that verbal disclosures might take include:
 - (1) "I do not have any financial relationships with any companies whose work relates to the issues addressed by this committee."
 - (2) "I receive compensation from ___(name of company)___ for membership on its speakers bureau."
 - (3) "I received compensation from ___(name of company)___ for chairing a committee related to ___(name of drug)___."
 - (4) "I received compensation from ___(name of company)___ when I attended a dinner program regarding ___(name of topic)___."
 - (5) "I received compensation from ___(name of company)___ for an educational grant pertaining to ___(name of subject)___."
 - (6) "I received an in-kind contribution from ___(name of company)___ for a presentation that I gave regarding ___(name of subject)___."
- Refer to Handbook 1004.07 for additional requirements related to financial relationships with industry.