

## **FIREWALL VERIFICATION FOR NON-ACCME ACCREDITED PROVIDERS**

If your organization, or any affiliate or subsidiary of your organization, undertakes promotional or consulting (including advertising) services for Bristol-Myers Squibb ("BMS"), and is **NOT** currently accredited by the ACCME to provide continuing medical education ("CME") programs, you must complete this form before your grant request can be processed. If any educational or logistics partner, or any affiliate or subsidiary of a partner organization to be involved in the proposed activity conducts such for work BMS, that partner must also provide the information requested below for the application to be processed. For each question that follows, please provide detailed information that fully explains your response. Please attach documentation in support of these responses.

### **GENERAL INFORMATION**

Describe the nature of your organization's relationship to the vendor that undertakes promotional or consulting work for BMS. For example, is your organization an affiliate or subsidiary of the vendor that provides such services to BMS?

Provide an estimate of the relative percentage of services that the vendor conducts for BMS on an annual basis. For example, does work from BMS account for 10% or 50% of the vendor's revenues each year?

Provide general background information about your organization, including the year in which it was founded. If your organization is accredited by another accrediting body to provide continuing education, please identify the name of that entity, in addition to completing this certification.

### **SEPARATION OF PERSONNEL**

Indicate whether any executives, directors, managers, meeting/event planners, or any other personnel in your organization are in any way, associated with or employed by the vendor that provides promotional or consulting services to BMS.

Indicate whether your organization utilizes writers or others involved in the development of substantive content for educational programs who are associated with the vendor that provides promotional or consulting activities to BMS.

Explain whether your organization maintains a strict policy prohibiting individuals who are or have worked on promotional or consulting projects within the last twelve (12) months, from working on any educational grant projects. Please provide documentation of this policy.

Explain whether your organization maintains and enforces a strict policy forbidding personnel that work on promotional and consulting programs from communicating in a substantive way with those who work on educational activities supported by grants. Please provide documentation of this policy.

Explain whether your organization coordinates or otherwise works with the vendor on presentations to clients about promotional and independent medical education programs.

Attach an organizational chart that depicts precisely how personnel and units that undertake grant-funded activities are separated from those that provide promotional or consulting services to BMS.

### **SEPARATION OF BUSINESS UNITS**

Indicate whether your organization and the vendor maintain separate physical locations and addresses. For example, is your organization headquartered in an entirely separate building or in an office suite that is part of the vendor's headquarters? Please provide detailed information, including the addresses of each organization.

Indicate whether your organization maintains different telephone numbers, fax numbers and machines, and e-mail addresses (internet domain names) from those established by the vendor. Please provide these details for each organization.

Explain whether your organization has established entirely separate communication systems, filing systems, and billing systems from those utilized by the vendor.

Describe any measures that have been established to ensure that personnel from your organization and the vendor do not have access to each others' respective offices and systems.

Describe what, if any, "terms of use" measures your organization has established to ensure that information gained in the context of educational programs is not shared with the vendor.

Confirm that, if an educational grant is made by BMS for the proposed activity, BMS would maintain the right to conduct an evaluation and/or audit of these and other firewall measures to ensure that they have been properly established and implemented.