

Revised 6-26-24

- I. The intent of this policy is to establish a process to 1) identify and mitigate relevant financial relationships of those in a position to influence the content and speaker selection for certified medical education, and 2) ensure financial relationships with ineligible entities are provided to participants prior to the beginning of certified medical education, so they may form their own judgment as to the objectivity of the educational content.
- II. **Disclosure** - Anyone in a position to influence the content and speaker selection for Banner certified medical education (planners, faculty, content reviewers and authors) must disclose whether or not they have/had, financial relationships (of any amount) with ineligible companies—within the previous 24 months. The ACCME defines ineligible companies as those *entities producing, marketing, selling or re-selling, or distributing health care products used by or on patients*. Providers of clinical services directly to patients are excluded. Disclosure information must be documented on a BH CME Disclosure form and submitted in ample time for CME reviewers to determine mitigation of any potential conflicts of interest prior to the scheduled activity. These guidelines apply:
  - **Planners** – Disclosure information must be obtained prior to participation in developing content or selecting speakers. If a planner reports a relevant financial relationship on the disclosure form, the CME office must be notified in enough time to mitigate.
  - **Faculty** – If faculty reports a relevant financial relationship, the planning coordinator must notify the CME Office to initiate the mitigation process as soon as possible prior to the activity.
  - **Content Reviewers** – If a content reviewer reports a relevant financial relationship, he/she is not allowed to review educational content that is relevant to that relationship
- III. **Refusal to Provide Disclosure Information** - Failure to provide this information will result in disqualification from participation.
- IV. Owners or employees of an ineligible company may not participate in planning or as faculty unless 1)the subject matter does not align with their company’s products or service lines; 2)the content is on basic scientific research; or 3)they are present only for technical support and making no care recommendations.
- V. **Mitigation Process** - If financial relationships with ineligible entities are reported, participation as a planner, faculty, content reviewer, or author is contingent upon mitigation of those relationships. The CME Manager will initiate the process with the Chairman of the Continuing Interprofessional Education (CIPE) Committee. After review of the disclosed information, the Chairman or designated reviewer(s) may conclude:
  - 1) The reported relationship(s) is/are not relevant to the content of the education.
  - 2) If a planning director or planning members report a relevant financial relationship, they are required to complete and sign a Banner Health Recusal form.
  - 3) If faculty has a relevant financial relationship, their presentation will be requested for review prior to the education to ensure objectivity. The CIPE Chairman and/or designated persons will review the presentation for commercial messages or logos, unnecessary promotion, or use of brand names. If the content appears commercially influenced, the speaker will be asked to revise and resubmit the presentation.

**VI. Disclosure to participants** - The disclosure information must be provided to participants prior to the beginning of the education in a format that clearly identifies the individual and either states there are no financial relationships with ineligible entities or describes the nature of the relationship and the company or product. There must be a statement that relevant financial relationships have been mitigated according to the *ACCME Standards for Integrity and Independence in Accredited CE Resources* and Banner policies.