**FINANCIAL DISCLOSURE POLICY, DEFINITION, PROCESS**

# FINANCIAL DISCLOSURE POLICY

As providers accredited by the Accreditation Council for Continuing Medical Education (ACCME) and the American Nurses Credentialing Center (ANCC) Commission on Accreditation, Dartmouth Health must insure balance, independence, objectivity, and scientific rigor in all its educational activities. Planning must be free of the influence or control of an ineligible company^, and promote improvements or quality in healthcare. All scientific research used to support patient care recommendations must conform to generally accepted standards of experimental design, data collection, and analysis. Activity Director(s), Planning Committee Member(s), Speaker(s), Author(s) or Anyone in a Position to Control the Content are expected to disclose all financial relationships with ineligible companies^. Relevant financial relationships must be mitigated and disclosed to learners prior to engaging in a learning activity. Anyone who refuses to disclose will be disqualified from participating in the activity.

# RELEVANT FINANCIAL RELATIONSHIP DEFINITION

A relevant financial relationship is created when individuals in a position to control the content of the continuing education activity have a financial relationship with an ineligible company^ (a) that benefits the individual in any financial amount and (b) that has occurred within the past 24 months, therefore may bias their opinions and teachings. This may include receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research and clinical trials), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities for which remuneration is received or expected.

# FINANCIAL DISCLOSURE PROCESS

An authorized person **(Activity Director, Medical Director IPCE/Associate Dean CME, Vice President CLPD, CNE Director, Nurse Planner, appointed Geisel faculty)** will **identify, review and mitigate all relevant financial relationships** that Activity Director(s), Planning Committee Member(s), Speaker(s), Author(s) or Anyone in a Position to Control the Content disclose **prior** to an educational activity being delivered to learners.

# INELIGIBLE COMPANY^

An **ineligible company** is any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

Specific examples of ineligible companies include:

* 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

# FOR MORE INFORMATION

Visit the Standards for Integrity and Independence in Accredited Continuing Education at <https://accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce>

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.