

Policy Title:	Dartmouth Health Policy on the Refusal/Failure to Disclose or Mitigate Relationships for an Accredited Continuing Education (ACE) Activity	Policy ID:	Reference #
Keywords	continuing education, CE, CME, continuing medical education, CNE, continuing nursing education, learning activity, relevant financial relationship, disclosure, mitigation, resolution, attestation form, relationship with industry, commercial interest, ineligible company, activity director, nurse planner, accredited, Live Activity, Conference, Course, Symposium, Regularly Scheduled Series, Grand Rounds, Morbidity and Mortality, Case Conferences, Journal Clubs, Enduring Material, online learning activities, Lead Planner, IPCE, JA, Joint Accreditation, Pharmacy, planning committee, ACE, Accredited Continuing Education		

I. Purpose of Policy

The purpose of this policy is to inform the Lead Planner a Dartmouth Health Accredited Continuing Education (ACE) Activity about the collection of Financial Disclosure and Agreement forms from all Planning Committee Member(s), Speaker(s), Author(s) or anyone in a position to control the content. Failure to disclose by not completing and returning the *Dartmouth Health Financial Disclosure and Agreement Form* or by withholding complete information, in advance of the activity, shall constitute a refusal to disclose and therefore require disqualification of the above individual from participating in the activity.

II. Policy Scope

The scope of this policy includes: all Dartmouth Health employees; all individuals with an official, current faculty appointment from the Geisel School of Medicine at Dartmouth; and all employees' and faculty members' administrative staff. The scope of this policy also covers all planning committee members, speakers, authors, and anyone else in a position to control the content of an ACE activity.

III. Definitions

Accredited Activity – An accredited activity is an educational offering (e.g., Live Activity/Conference/Course/Symposium, Regularly Scheduled Series/Grand Rounds/Morbidity and Mortality/Case Conferences/Journal Clubs, Enduring Material/online learning activities) that is planned, implemented, and evaluated in accordance with the Joint Accreditation or other accrediting bodies' accreditation criteria, and associated Dartmouth Health and Geisel School of Medicine at Dartmouth policies.

Physician Lead Planner must be a physician, researcher, doctorally prepared professional who possesses an official, current or emeritus/a faculty appointment from the Geisel School of Medicine at Dartmouth and be an employee in good standing of a Dartmouth Health Member Organizations, the VAMC, or the Geisel School of Medicine at Dartmouth. The physician lead planner has overall responsibility for planning, developing, implementing, and evaluating the content and logistics of an ACE activity.

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Nurse Lead Planner must be an active member of the Nursing Continuing Education Council (NCEC) and be an employee in good standing of a Dartmouth Health Member Organizations. The nurse lead planner has overall responsibility for planning, developing, implementing, and evaluating the content and logistics of an ACE activity.

Pharmacy Lead Planner must be a pharmacist who is actively engaged in practice and holds a current license and be an employee in good standing of a Dartmouth Health Member Organizations. The pharmacy lead planner has overall responsibility for planning, developing, implementing, and evaluating the content and logistics of an ACE activity.

Activity Coordinator – A Dartmouth Health or Geisel School of Medicine at Dartmouth employee or an external event planner charged by a Dartmouth Health or Geisel School of Medicine at Dartmouth planning committee to manage program planning and event coordination of an ACE activity.

Relevant Financial Relationships – Circumstances to create a relevant financial relationship when an individual has an opportunity to affect CE content about products or services of an ineligible company with which he/she has a financial relationship. Examples of financial relationships include employee, researcher, consultant, advisor, speakers' bureau, 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.

There is no minimum financial threshold: individuals must disclose all financial relationships, regardless of the amount, with ineligible companies occurring within the past 24 months. Individuals must disclose regardless of their view of the relevance of the relationship to the education.

Ineligible Company – The ACCME defines an “ineligible company” as any entity whose primary business purpose is producing, marketing, selling, re-selling or distributing healthcare products used by or on patients, with the exemption of non-profit or government organizations and non-health care related companies.

Disqualification – Disallowed from participating in the accredited CE activity.

IV. Policy Statement

A planning committee member, speaker, author or other individual in a position to control content of a Dartmouth Health accredited CE activity who refuses to disclose personal financial relationships with an ineligible company in advance of the activity or program, or to cooperate in the mitigation of a personal relevant financial relationship by the Lead Planner, Medical Director of IPCE/Associate Dean for CME, Vice President of CLPD, CNE Director, appointed Geisel faculty designate/qualified other, will be disqualified from development, management, presentation or evaluation of the ACE activity.

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Specifically, failure to disclose by not completing the *Dartmouth Health Financial Disclosure and Agreement Form* **at least fifteen business days in advance of the activity** or by withholding complete information, shall constitute a refusal to disclose and therefore may require disqualification from the activity/session because accreditation criteria have not been met for credit/contact hours to be awarded.

When refusal or failure to disclose (and subsequently unable to mitigate, if necessary) occurs, the Lead Planner, Medical Director of IPCE/Associate Dean for CME, Vice President for CLPD, CNE Director, or appointed Geisel Faculty must complete the appropriate financial disclosure mitigation process by documenting that failure to disclose resulted in replacement of the speaker or removal of credit/contact hours.

V. References

Joint Accreditation Criteria – [Joint Accreditation Criteria | Joint Accreditation.](#)

ACCME Standards for Integrity and Independence in Accredited Continuing Education – [Standards for Integrity and Independence in Accredited Continuing Education | ACCME](#)

Responsible Owner:	Center for Learning and Professional Development	Contact(s): email	clpd.support@hitchcock.org
Approved By:	Dartmouth Health Medical Director of IPCE/Associate Dean for CME at Geisel School of Medicine at Dartmouth, D-H Vice President of CLPD, Executive Vice President of DHMC	Version #	Version
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Related Policies & Procedures:	Activity Director Eligibility for a Dartmouth Health Accredited Continuing Medical Education (CME) Activity, Dartmouth Health Policy on the Refusal/Failure to Disclose Relationships with Ineligible Companies for an Accredited CE Activity		
Related Job Aids:			

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