

Policy Title	Financial Disclosure, Mitigation and Notification to Learners for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy	Policy ID	32035
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 codify for the planning committee members and activity coordinators of a Dartmouth Health Accredited Continuing Education (ACE) activity their responsibilities for gathering all financial relationships with ineligible company(ies) (or lack thereof) reported via a mandatory, current learning management system *Dartmouth Health Financial Disclosure and Agreement Form*, mitigating reported relevant relationships, and informing learners prior to the start of an ACE activity. Planning committee members, speakers, authors, and anyone else in a position to control the content of an ACE activity are all required to disclose all financial relationships with ineligible company(ies) and mitigate relevant financial relationships.

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 Continuing Education (ACE) Activity – An ACE 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 Criteria associated Dartmouth Health policies and protocols.¹

ACCME Standards for Integrity and Independence in Accredited Continuing Education – The Accreditation Council for Continuing Medical Education (ACCME®) Standards for Integrity and Independence are the rules that ACE providers, including Dartmouth Health, must follow. The Standards are designed to ensure that accredited continuing education serves the needs of patients and the public; present learners with only accurate, balanced, scientifically justified recommendations; assure healthcare professionals and teams that they can trust accredited continuing education to help them deliver safe, effective, cost-effective, compassionate care that is based on best practice and

evidence; and create a clear, unbridgeable separation between accredited continuing education and marketing and sales.²

Lead Planner - Person responsible for oversight of the educational quality and financial integrity of the activity. See Lead Planner Eligibility for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy and Roles and Responsibilities of Lead Planners, Coordinators, and Center for Learning and Professional Development Staff for Live Accredited Continuing Education (ACE) Activities.

Activity Coordinator – A Dartmouth Health member organization or partner or an external event planner charged by a Dartmouth Health planning committee to manage program planning and event coordination of an ACE activity.

Ineligible Company – Any entity whose primary business is producing, marketing, selling, re-selling or distributing healthcare products used by or on patients.

Relevant Financial Relationships – Circumstances that may create a relevant financial relationship are when an individual has an opportunity to affect ACE 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.

IV. Policy Statement

A planning committee member and/or activity coordinator of a Dartmouth Health ACE activity is responsible for reporting to learners prior to the start of an activity all relevant financial relationships and documentation of mitigation by the Lead Planner, Medical Director & Associate Dean for Interprofessional Educational Practice (IPEP), Vice President of CLPD or Director of ACE depending on the activity type and format.

The disclosure documentation is provided by the ACE Office to the activity coordinator/event planner who ensures that appropriate disclosure takes place prior to the start of the learning.

Acceptable modes of disclosure include:

1. written disclosure documentation;
2. verbal disclosure;
- and/or,
3. written disclosure in the opening section (e.g., the directions page) or activity website of an enduring material (i.e., Internet Activity, DVD, printed or recorded materials).

For one-time activities, all planners and faculty must complete the *Dartmouth Health Financial Disclosure and Agreement Form* as part of the accreditation application which is due **no later than 45 days prior to the activity date.**

For Regularly Scheduled Series (RSS), applications are completed annually and include all planners *Dartmouth Health Financial Disclosure and Agreement Forms*. The *Dartmouth Health Financial Disclosure and Agreement Forms* for faculty are required **at least 15 business days in advance of the presentation.**

Failure to disclose by not completing the *Dartmouth Health Financial Disclosure and Agreement Form* or by withholding complete information, may 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.

If a relevant financial relationship is disclosed and the mitigation process must be completed, presentation slides (draft is acceptable) are required be provided to the Center for Learning and Professional Development accreditation team **at least 15 business days in advance of the activity/presentation.**

V. References

¹ *Joint Accreditation Criteria* – [Joint Accreditation Criteria | Joint Accreditation.](#)

² *ACCME Standards for Integrity and Independence in Accredited Continuing Education* – [Standards for Integrity and Independence in Accredited Continuing Education | ACCME](#)

Responsible Owner:		Contact:	Melinda Potter
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Related Polices & Procedures:	Lead Planner Eligibility for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy Financial Disclosure, Mitigation and Notification to Learners for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy		
Related Job Aids:	Roles and Responsibilities of Lead Planners, Coordinators, and Center for Learning and Professional Development Staff for Live Accredited Continuing Education (ACE) Activities Job Aid		