

Policy Title	Refusal/Failure to Disclose or Mitigate Relationships for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy	Policy ID	31277
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I. Purpose of Policy

The purpose of this policy is to inform the Lead Planner of 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 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 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 to create a relevant financial relationship 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.

Disqualification – Disallowed from participating in the ACE activity.

IV. Policy Statement

A planning committee member, speaker, author or other individual in a position to control content of a Dartmouth Health ACE activity who refuses to disclose all financial relationships with ineligible company(ies) in advance of the activity, or to cooperate in the mitigation of a relevant financial relationship(s) by the Lead Planner, Medical Director & Associate Dean for Interprofessional Educational Practice (IPEP), Vice President of CLPD, Director of ACE, or interprofessional accreditation system directors, will be disqualified from development, management, presentation or evaluation of the ACE activity.

Specifically, 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.

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.**

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.**

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, or Director of ACE 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

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:	Center for Learning and Professional Development	Contact:	Melinda Potter
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Related Policies & Procedures:	Lead Planner Eligibility for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy Refusal/Failure to Disclose or Mitigate Relationships 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		