

	Policy for Financial Disclosures from Directors, Planners, and Speakers	
Continuing Education	Original Date: 5/15/2015 Revision Date: 11/3/2020 Effective Date: 2/25/2019	Approved By:  <hr/> Signature Title: System Director of Medical Education Approval Date: 11/3/2020

Purpose:

The purpose of this policy is to ensure balance, independence, objectivity, and scientific rigor in all individually or jointly provided educational programs. The intent of this policy is to identify conflicts of interest, facilitate resolution according to HHC’s CE Resolution of Conflicts of Interest policy, and ensure that any disclosure information is identified openly so that the listeners may form their own judgments about the presentation with the full disclosure of the facts. Failure to follow this policy will adversely affect the status of Hartford HealthCare (HHC) as an accredited provider of CE.

Scope:

This policy applies to the HHC Community, credentialed community providers, external providers, and spouses/partners of any of the above audiences seeking approved CE credits for an educational activity.

Policy:

Prior to the educational activity, all individuals participating in the planning or presenting of any HHC sponsored program must disclose to the program audience any relevant conflict(s) of interest that may have a direct bearing on the subject matter of the CE program. This pertains to financial or commercial interests and/or

relationships with pharmaceutical companies, biomedical device manufacturers, or other corporations whose products or services are related to the subject matter of the presentation topic. In addition, this policy also applies to the financial or commercial interests and/or relationships of the spouse/partner of any planner, faculty, or presenter.

Financial Disclosures will be sent to each individual via our electronic platform. No activity will be approved until all disclosures are current.

The HHC CE team will accept Financial Disclosure Statements from other accredited programs (e.g. Nursing) at HHC in lieu of the CE document as long as the alternate disclosure contains the same information.

The HHC CE team will also accept a verbal or emailed Disclosure Statement from any planner, faculty, or presenter in lieu of the current document. The team member accepting the verbal or emailed disclosure will ensure that it is saved in the activity file.

An individual who refuses to disclose relevant financial relationships will be recused from all roles related to the CE program, other than as a learner, and cannot have control of, or responsibility for, the development, management, presentation, or evaluation of the CE activity.

Exception: For some events, speaker and planner disclosures are not required. This is limited to events where there will be no education or recommendations related to a commercial interest. If the content of the CE activity is not related to the products or services of a commercial interest, there are no relevant financial relationships to identify and no conflicts of interest to identify or resolve. Examples include, but are not limited to, ethics education, Schwartz Rounds, Epic education, High Reliability Organization education, and similar programs. The CE team will determine if Financial Disclosures are not needed for an event.

Definitions:

- *HHC Community:* includes all employees, volunteers, students and contracted individuals, including, without limitation, medical directors, section, department and division chiefs, members of the board of directors and board delegated committees, officers, executive leadership, and trainees
- *Credentialed Community Providers:* Non-employed providers with practicing privileges throughout Hartford HealthCare
- *External Providers:* Providers with no affiliation nor privileges at a Hartford HealthCare entity

- *Commercial Interest*: any entity producing, marketing, re-selling, or distributing health care goods or services consumed by or used on patients with the exemption of 501c non-profit organizations, government organizations, non-health care related companies, liability insurance providers, health insurance providers, group medical practices, for-profit hospitals, for-profit rehabilitation centers, and for-profit nursing homes
- *CE Team*: Hartford HealthCare CE team
- *Sponsoring Department*: the primary department or providers responsible for planning, presenting and evaluating the CE Activity
- *Individual*: a person, including their spouse or significant other
- *Relevant Financial Interest*: any financial relationship in any amount occurring within the past 12 months that creates a potential or perceived conflict of interest. Financial benefits could be other than monetary.

References:

- [ACCME Standards of Commercial Support](#)

Related Policies:

- HHC Vendor Interaction Policy
- HHC Conflict of Interest Policy
- HHC CE Resolution of Conflicts of Interest Policy

Related Documents:

- Commercial Support Agreement
- Resolution of Conflict of Interest Form
- Speaker Attestation
- Planner Financial Disclosure
- Application Financial and Commercial Support Form
- Speaker Financial Disclosure