

Baystate Health  
Office of Continuing Education  
Holyoke, MA 01040

**SUBJECT: Disclosure and Resolution of Faculty and Planner Personal Conflicts of Interest**

***Policy***

Baystate Health (BH) Office of Continuing Education (OCE) requires disclosure of commercial relationships from all individuals who are in a position to control any aspect of a continuing education activity such as planners, faculty, content experts and their respective spouse and/or partner.

- A commercial interest is an entity producing, marketing, re-selling or distributing healthcare goods or services consumed by, or used on patients.
- A vested interest is a relationship from which one has received or expects to receive a private benefit such as salary and wages from an employer, honoraria, grant support, equity position, royalties, etc. from pharmaceutical companies, medical equipment or medical service providers.
- When a presentation includes discussion of any unlabeled/investigational use of a commercial product, the presenter is required to disclose this to the participants.
- When discussing therapeutic options, it is our preference that only generic names be used. It is necessary to use a trade name, those of several companies must be used.

***Purpose***

To ensure balance, objectivity and scientific rigor in all of its continuing education activities by insuring compliance with the standards set forth by accrediting bodies: Accreditation Council for Continuing Medical Education (ACCME), American Nurses Credentialing Center/Massachusetts Association of Registered Nurses (ANCC/MARN) and the American Psychological Association (APA).

***Scope***

Any and all individuals who are in a position to control any aspect of a continuing education activity such as planners, faculty, content experts and their respective spouse and/or partner.

***Procedure***

1. Speakers, content experts, planners are requested to complete, sign and return the Faculty and Planner Disclosure Form on their own behalf and respective spouse and/or partner for any educational activity that is provided or co-provided by BH OCE. (See attachment)
2. Speakers, content experts and planners who fail to comply with this request are disqualified from serving in those roles.
3. CE faculty, content experts, planners or Provider relationships with commercial companies, or lack of, are disclosed in writing in conference materials such as syllabi, publicity materials and/or on-line at [www.baystatehealth.com/learn](http://www.baystatehealth.com/learn)
4. In the rare event that disclosures were not communicated in writing, a verbal announcement will be made prior to the start of the provider directed activity. A program designee will attend the activity to determine verbal disclosure



Verification of the implementation of a mechanism to identify conflicts of interest prior to the start of an activity. (C7; SCS 2.3)



Verification that individuals who refuse to disclose are disqualified from CME planning and implementation, *if applicable*. (C7; SCS 2.2)

announcement and sign an attestation to that effect which will become a part of the permanent file.

5. All disclosed relationships will be investigated to assess potential bias. Investigative methods may include but are not limited to: communication with the individual to seek clarification or amplification of the relationship, review of the presenter's PowerPoint presentation, etc.
6. The perceived or real conflict of interest must be resolved in order for the individual to serve in the capacity of planner, faculty/content expert. Failure to satisfactorily resolve the conflict will result in disassociation of the individual with the educational activity.



---

Joanna Barnett, MBA, RN  
Director, Office of Continuing Education

Adopted 2/18/95

Reviewed 6/97, 6/98, 6/02,

Revised 7/99, 7/00, 6/04, 12/07, 7/08