



Continuing Medical Education  
Disclosure and Resolution of Conflict of Interest Policy  
for Banner-sponsored CME Activities

- I. The intent of this policy is to identify conflicts of interest, facilitate resolution according to Banner procedure, and ensure disclosure information is provided to participants prior to the activity, so they may form their own judgment as to the objectivity of the educational content.
- II. **Disclosure** - All program planners, faculty and authors participating in Banner Health sponsored CME must disclose relevant financial relationships with commercial interests. This requirement also applies to the spouse/partner of the planner, faculty or author. Commercial interests include entities producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Disclosure information must be obtained in ample time to allow for resolution of any reported conflicts of interest prior to the scheduled activity.
- III. **Refusal to Provide Disclosure Information** - Failure to provide this information will result in disqualification from participation.
- IV. Employees of a commercial interest may not participate as faculty unless the subject matter does not align with their company's products or service lines.
- V. **Resolution** - If a conflict of interest is reported, participation as a planner, faculty or author is contingent upon resolution of the reported conflict(s). The CME Manager will initiate resolution with the CME Accreditation Committee Chairman or Sr Director who may review the content of the presentation for commercial bias or request additional information. The chairman or Sr Director may delegate to, or include, other reviewers at his discretion to recommend resolution.
- VI. The Chairman or designated reviewer(s) may determine there is no relevant conflict of interest with the activity content; or they will make a recommendation for resolution, which may include, but is not limited to, requiring the planning director to:
  - 1) secure a different expert speaker;
  - 2) limit a planner's involvement with all or a portion of the content;
  - 3) revise the content of the activity

The Chairman or the Sr Director will make the final decision considering recommendations from designated reviewers.
- VII. **Disclosure to participants** - The program director, planner(s), faculty and author disclosure information must be made known to participants prior to the beginning of the activity.

Approved by the Banner CME Accreditation Committee: February 11, 2014

July 25, 2012

March 5, 2010

December 8, 2006

Initial Effective Date: April 30, 2005