

- 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 financial relationships (of any amount in the past 12 months) with commercial interests. This requirement also applies to the spouse/partner of the planner, faculty, content reviewer, or author. The ACCME definition of commercial interests include entities producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. It excludes providers of clinical services directly to 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, content reviewer, or author is contingent upon resolution of the reported conflict(s). The CME Manager will initiate resolution with the Continuing Interprofessional Education (CIPE) Committee Chairman or Co-Chairman who may review the content of the presentation for commercial bias or request additional information. The Chairman or Co-Chairman may delegate to, or include, other reviewers in the process.
- 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
- VII. **Disclosure to participants** - The program director, planner(s), faculty, content reviewer, and author disclosure information must be made known to participants prior to the beginning of the activity.