

Conflict of Interest Policy

Purpose

_____ is an ASHA Approved CE Provider. It is the _____ CE committee's policy to ensure balance, independence, objectivity and scientific rigor in all CE courses. The desired outcome of this policy is to conduct CE courses that are free from the appearance of or actual conflicts of interest ("COI") and to avoid the introduction/demonstration of bias in favor or against a product, service, or device in return for known or unknown personal and professional gain. The intent of this policy is to ensure that any potential conflict will be identified openly so that the course participants may form their own judgments about the presentation with the full disclosure of facts.

References

The _____ CE program's policy to identify and resolve conflicts of interest is drawn from The American Speech-Language-Hearing Association (ASHA) Continuing Education Board (CEB) Requirement 3: Transparency in course Planning, Deliver, and Marketing. Further information about the CEB Requirements may be on the [ASHA web site](#).

Policy

_____ CE courses will adhere to the ASHA CEB Requirement 3. All individuals in a position to influence the content of a course to be offered for ASHA CEUs must disclose any relevant financial or nonfinancial relationship(s) that might affect independent involvement in the proposed CE course. Any speaker or planning committee member who refuses to disclose financial or nonfinancial relationships will be disqualified from participating in the planning and implementation of the course. The CE disclosure process requires completion and submission of the disclosure forms indicating no conflicts of interest or indicating relevant financial or non-financial relationships that could be perceived as a conflict of interest. Our process for disclosing and resolving conflicts of interest are outlined below.

Definitions

Bias

a particular tendency or inclination, especially one that prevents unprejudiced consideration of a question; prejudice.

Conflicts of interest (COI)

situations where personal and/or financial considerations compromise judgment or where the situation may appear to provide the potential for professional judgment to be compromised. Conflicts of interest may arise in continuing education since the potential exists for professional judgment and practice to be biased by an economic interest in, or personal benefit from, professionally related commercial enterprises.

Relevant Financial Relationships

Instructional personnel have a relevant financial relationship if that relationship could influence the information presented in the course and could be perceived as a conflict of interest by learners.

Relevant Nonfinancial Relationships

Instructional personnel have a relevant nonfinancial relationship if that relationship could influence the information presented in the course and could be perceived as a conflict of interest by learners.

Procedure to identify, resolve and disclose relevant financial and nonfinancial relationship(s)

Identifying and resolving relevant financial and nonfinancial relationship(s)

Individuals Planning and Developing Course Content

_____ requires that all individuals involved in developing course content to be offered for ASHA CEUs disclose relevant financial and nonfinancial relationship(s).

- a) Prior to participating in the development of a course's content, all individuals must complete a disclosure form. Individuals who refuse to complete a disclosure form will be disqualified and may not participate in developing course content.
- b) _____ reviews the completed disclosure forms.
- c) In the event of an identified financial or nonfinancial relationship, one or more of the following actions will take place to resolve the potential COI:

- We will engage the planner/speaker in a guided interview process which seeks to understand how the relevant financial or nonfinancial relationship may influence the content of the course.
- The individual may withdraw from the planning committee.
- The individual may be excluded from planning the parts of the course related to the COI.
- The course may be subject to peer review by the remainder of the planning committee to ensure the absence of bias in its content.
- The course may be submitted for peer review to an external content expert.

d) In addition to identifying and resolving COI during the course development stage, the _____ communicates with all individuals involved in developing course content _____ days prior to course delivery to identify relevant financial or nonfinancial relationship(s) that have developed since course planning was completed.

All actions to **identify** and **resolve** conflicts of interest among the individuals developing the course will be documented and retained for 7 years by _____.

Speakers/authors

_____ requires that all individuals involved in developing and delivering course content to be offered for ASHA CEUs disclose relevant financial and nonfinancial relationship(s).

When an individual accepts the invitation to participate as instructional personnel in a course to be offered for ASHA CEUs, the _____ will obtain a disclosure form of any relevant financial and nonfinancial relationships related to the course content. Individuals who refuse to complete a disclosure form will be disqualified and may not participate in developing or delivering course content.

_____ reviews the completed disclosure forms.

In the event of an identified financial or nonfinancial relationship, one or more of the following actions will take place to resolve the potential COI:

- We will engage the speaker/authors in a guided interview process which seeks to understand how the relevant financial or nonfinancial relationship may influence the content of the course.
- The individual may withdraw from the planning committee or from being a speaker or author.
- The individual may be excluded from planning or delivery of the parts of the course related to the COI.
- The course may be subject to peer review by the remainder of the planning committee or an outside objective entity to ensure the absence of bias in its content.
- The course may be submitted for peer review to an external content expert

In addition to initial disclosure conducted prior to approving speakers/authors, _____ communicates with all instructional personnel _____ days prior to course delivery to identify relevant financial or nonfinancial relationship(s) that have developed since course planning was completed and speaker/author approvals were made.

All actions to **identify** and **resolve** conflicts of interest among the individuals developing and presenting the course will be documented and retained for a minimum of 7 years.

Unresolved Conflicts of Interest

If a COI is identified for any speaker or individual involved in the development of course content and cannot be resolved by the mechanisms described above, further action must be taken to prevent the introduction of bias into the activity. Such actions may include:

- Removal of the speaker or individual involved in the development of course content from the course.
- Offer the course or session, but do not offer it for ASHA CEUs

These requirements are also applicable to a speaker or individual involved in planning course content who refuses to disclose financial relationships. These individuals are considered to be in conflict until appropriate disclosures are completed.

Instructional personnel disclosure to potential registrants and course attendees

_____ must disclose to potential registrants and at the start of the course each instructional personnel's relevant financial and nonfinancial relationships to the course content. The Provider must also disclose when instructional personnel have no relevant financial and nonfinancial relationships.

1. This disclosure information must be available in promotional efforts and at the start of the course.
2. The following information must be disclosed to learners:
 - The name of the instructional personnel;
 - Relevant financial relationship(s): Listing the name of the organization and the type of financial relationship; and/or
 - Relevant nonfinancial relationship(s): Listing the name of the organization and the type of nonfinancial relationship; or
 - No relevant financial or nonfinancial relationships exist.

Adapted with permission from Wright State Medical School
http://www.med.wright.edu/fca/cme/Conflict_of_Interest_Policy