

SAINT MARY'S HOSPITAL
CONFLICT OF INTEREST POLICY

It is the policy of the Saint Mary's Hospital Committee on Continuing Medical Education to ensure balance, independence, objectivity, and scientific rigor in all educational programs.

All faculty participating in SMH CME activities are required to disclose to the program audience (orally or with slide): any relevant financial relationship(s) they (or spouse/partner) have with a commercial interest that benefits the individual in any financial amount that has occurred with the past 12 months and the opportunity to affect the content of CME about the products or services of the commercial interest.

The program planner is responsible for identifying and resolving any conflict of interest prior to the CME. The program planner also ensures that commercial interest will not control the content of the event.

It is in our policy that we have a required CME slide where there is specification that the speaker has nothing to disclose, that anyone in control of content has no relevant financial or commercial interest and that we do not accept any commercial support.

If any commercial exhibits are displayed and advertised concomitantly with the educational program the CME committee ensures that these commercial exhibits are displayed and advertised in a separate location (room).

The CME Committee on Continuing Medical Education will ensure that any conflicts of interest are flagged before the educational activity occurs. Any individual who refuses to disclose and resolve financial relationships will be disqualified from participating in the event. A new speaker will then be assigned.

It is in our policy that either the speaker or the CME committee designee display the following attestation on each CME activity. This attestation is a guarantee that a commercial interest is never in control of content.

This program is sponsored by Saint Mary's Hospital. Saint Mary's Hospital is accredited by the Connecticut State Medical Society (CSMS) to provide continuing medical education (CME) for physicians. Saint Mary's Hospital designates this activity for a maximum of 1 APA PRA Category 1 Credits™. Physicians should only claim credit commensurate with the extent of their participation in the activity. This speaker does not receive any commercial support.

Please refer to Definition of a Commercial Interest and Disclosures Relevant to Potential Commercial Bias (ACCME) – attached.

March 28, 2019

Definition of a Commercial Interest

A *commercial interest* is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.

The ACCME does not consider providers of clinical service directly to patients to be commercial interests - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.

A commercial interest is not eligible for ACCME accreditation. Commercial interests cannot be accredited providers and cannot be joint providers. Within the context of this definition and limitation, the ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME:

- 501-C Non-profit organizations (Note, ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint provider, but they can be a commercial supporter.)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

ACCME reserves the right to modify this definition and this list of eligible organizations from time to time without notice.

ACCME Note

Standard 6: Disclosures Relevant to Potential Commercial Bias

STANDARD 6.1

An individual must disclose to learners any relevant financial relationship(s), to include the following information: The name of the individual; The name of the commercial interest(s); The nature of the relationship the person has with each commercial interest.

STANDARD 6.2

For an individual with no relevant financial relationship(s) the learners must be informed that no relevant financial relationship(s) exist.

STANDARD 6.3

The source of all support from commercial interests must be disclosed to learners. When commercial support is "in-kind" the nature of the support must be disclosed to learners.

STANDARD 6.4

Disclosure must never include the use of a corporate logo, trade name or a product-group message of an ACCME-defined commercial interest.

STANDARD 6.5

A provider must disclose the above information to learners prior to the beginning of the educational activity.

