# Sample Instructional Personnel Disclosure Policy

**Purpose**

Click or tap here to enter text. 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 Click or tap here to enter text. 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.

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# Policy

Click or tap here to enter text. 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 instructor, author or planning committee member who refuses to participate in the disclosure process will be disqualified from participating in the planning and implementation of the course.

This process requires disclosure of 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 tendency or inclination, especially one that prevents unprejudiced consideration of a question; prejudice.

# Conflicts of interest (COI)

 An opposition between the private interests and the official or professional responsibilities of a person in a position of trust, power, and/or authority. Such conflicts may result in a situation in which personal, financial, and/or nonfinancial considerations have the potential to influence or compromise professional judgment in clinical service, research, consultation, instruction, administration, or any other professional activity. It is important to note that it is not necessary for such influence or compromise to have occurred before a situation can be identified as a conflict of interest. It is sufficient for the situation to appear to provide the potential for professional judgment to be compromised.

# 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)**

Click or tap here to enter text. requires that all individuals involved in planning, developing, and teaching course content to be offered for ASHA CEUs disclose potentially relevant financial and nonfinancial relationship(s).

* Prior to participating in the planning, development, or teaching of a course’s content, all individuals must disclose potentially relevant relationships. Individuals who refuse to participate in the disclosure process will be disqualified and may not participate in developing the course content or delivering the content.
* Provider staff reviews the disclosed information.
* 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/author in a guided interview process which seeks to understand how the financial or nonfinancial relationship may influence the content of the course.
	+ If relationships are identified that are relevant to the course content or could be perceived as being relevant, they will be mitigated in one of the following ways:
		- Disclose to the intended audience prior to and at the beginning of the course.
		- Have the course content peer reviewed by the remainder of the planning committee to ensure the absence of bias.
		- Submit the course content for peer review by an external content expert to ensure the absence of bias.

# Unresolved Conflicts of Interest

If relationships cannot be mitigated, they will be handled in one of the following ways:

* 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 offered, but not for ASHA CEUs

In addition to identifying and resolving disclosed relationships during the course development stage, the Click or tap here to enter text. communicates with all individuals involved in planning, developing, and teaching course content Click or tap here to enter text. 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 and presenting the course will be documented and retained for a minimum of 7 years.

# Instructional personnel disclosure to potential registrants and course attendees

Click or tap here to enter text. must disclose 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;