



**Department of International and Continuing Education**  
**Conflict of Interest/Disclosure Policy/Procedure**

Date: April 11, 2016

Responsible Party: Director of International and Continuing Education

All Salus University continuing education (CE) programs offered for CE credit emphasize the promotion of scientific and professional education rather than a product or service.

Salus University requires members of the department of International and Continuing Education Programs (ICE), members of the CE advisory group and all instructors in Salus University CE offerings to abide by the continuing education conflict of interest/disclosure policy.

The purpose of the continuing education conflict of interest/disclosure policy is to identify and resolve conflicts of interest (COI) relative to CE program offerings. The policy states that all individuals in a position to influence the content of a CE course must disclose any relevant financial or nonfinancial relationship(s) that might affect independent judgment and/or involvement in a proposed CE course. Any instructor, ICE department member or CE advisory group member who refuses to disclose financial or nonfinancial relationships relative to a course will be disqualified from participating in the planning and implementation of that course. A COI exists if a ICE department member, a CE advisory group member and/or an instructor has a relevant financial or non-financial relationship that could influence the information presented in the course and could be perceived as a conflict of interest by learners.

Prior to participating in the development of a course's content, all department of ICE members and CE advisory group members must complete a disclosure form. If an department of ICE member or CE advisory group member discloses a COI one of the following options will occur depending upon the nature of the COI:

- 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.

Once the instructors for the proposed CE course are identified, they must complete a disclosure form. The director of ICE and CE advisory group members review the completed disclosure forms. If a COI is suspected, the director of ICE will engage the instructor in a guided interview process that seeks to understand how the relevant financial or nonfinancial relationship may influence the content of the course. 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:

- The individual may withdraw from serving as an instructor.
- The individual may be excluded from serving as an instructor for the parts of the course related to the COI.
- The course or session may be offered, but not for CE credit.
- The CE course may be offered as planned but the attendees are fully informed of the COI in marketing materials and at the day of the event.

In addition to identifying and resolving COI during the course development stage, the ICE department will communicate with all individuals involved in developing course content again 4-6 weeks prior to the course delivery to identify relevant financial or nonfinancial relationship(s) that have developed since initial submission of the disclosure forms.

The following information will be disclosed to potential registrants in marketing materials and at the start of each course:

- The name of the instructor
- Any relevant financial or non-financial relationship
- The name of the organization for which the instructor has a relevant relationship
- The nature of the relevant relationship
- The instructor has no relevant financial and nonfinancial relationships

All actions to identify and resolve COI among the individuals developing and implementing a CE course will be documented and retained for 7 years by the department of ICE.