



Innovation Management and Conflict of Interest Program

**Policy VII – Conflicts of Interest in Education Policy**

<b>Target Group:</b> Cleveland Clinic United States Locations		<b>Original Date of Issue:</b> June 12, 2013	<b>Version</b> 4
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**Printed copies are for reference only. Please refer to the electronic copy for the latest version.**

## **Purpose**

To assure professional and commercial integrity in all matters, our Organization maintains a program that identifies and addresses conflicts of interest in education.

## **Policy Statement**

### **Engaging in Activities Related to Industry While Delivering or Receiving Medical Education**

The intent of the provisions in the Policy Implementation section below are ensure that Target Group [Staff, Employees](#) and [Trainees](#) adhere to the highest ethical standards when they participate in educational endeavors. This policy applies to Target Group [Staff, Employees](#) and [Trainees](#) who are responsible for educating, and to trainees and other learners who work and/or learn at our Organization as part of their career development.

## **Definitions**

**Target Group - herein defined as Cleveland Clinic United States locations-** Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, Mercy, South Pointe, Children’s Hospital for Rehabilitation, Weston Hospital, Coral Springs Ambulatory Surgery Center, Martin North Hospital, Martin South Hospital, Tradition Hospital , and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

## **Policy Implementation**

### **Required Disclosure of Industry Relationships to Trainees by Faculty**

Target Group [Staff, Employees](#) and [Trainees](#) who teach, whether to multiple Trainees or to one Trainee, must disclose to their Trainee(s) their relevant Financial Interests in [Non-Cleveland Clinic \(CC\) Entities](#), including book royalties. For example, the relationship must be disclosed if the products of the Entity are mentioned in the course of the training. Typically, such disclosure would be made in the presentation mentioning the product and also in the syllabus, if the course has a syllabus.

### **Attending Non-CC Entity-Sponsored Education and Training Activities**

Target Group [Staff, Employees](#) and [Trainees](#) may not accept gifts, remuneration, or other forms of compensation from [Non-CC Entities](#) solely for attending or listening to [Non-CC Entity](#)-sponsored educational events. They may not accept funds for reimbursement or defrayment of costs associated with travel to the activity unless serving as faculty at the activity. Attendees must pay his/her own tuition or reimburse the [Non-CC Entity](#) sponsor at fair market value for the educational activity. Certain exceptions to this provision (e.g., but not limited to, FDA-required training for use of a new procedure or device; certain professional society funded scholarships to attend meetings) may be permissible with approval from the IM&COI Program.

[Non-CC Entities](#) may not provide meals to Target Group [Staff, Employees](#) or [Trainees](#) during or in conjunction with an on-site educational activity unless the educational activity is [ACCME](#) accredited. It is permissible to accept modest meals paid for by [Non-CC Entities](#) and served during or in conjunction with an off-site educational activity.

### **Receipt of Educational Funds from Non-CC Entities**

Support of scholarships, fellowships, and other educational awards (Educational Funds) for training at our Organization by [Non-CC Entities](#) must be in the form of an educational grant to the institution, not an individual. Such support includes sponsorship of travel expenses for educational meetings. The provision of these funds must be in accordance with policies and procedures of the Philanthropy Institute or the Office of Sponsored Research and Programs. For such [Non-CC Entity](#) support of [Trainees](#), selection of the individual recipients is at the sole discretion of our Organization. There must be no *quid pro quo* (a favor or advantage granted or expected in return for something) provision of any kind for either the selected trainee or the program. Funds must be directed to the institution at the Institute level or higher (or equivalent), not to the Department or individual trainee. Allocation of such funds for scholarships, fellowships or educational meetings, including travel expenses to and from educational meetings, must be made by a committee designated by the Institute Chair (or the Education Institute Chair for allocation of funds to the institution, or equivalent). Any member of such a committee who has a Financial Interest of any kind with the Entity donating to the fund may not participate in decisions related to fund allocation. For [Non-CC Entity](#) support to attend educational meetings or programs, the Institute Chair or designee must agree to the educational merit of the program and approve the financial support.

Any exceptions to these provisions must be approved by the IM&COI Program.

### **Speaking and Training at Non-CC Entity-Sponsored Events**

Target Group [Staff, Employees](#) and [Trainees](#) are approved to speak at educational activities supported by [Non-CC Entities](#) that are [ACCME](#) accredited.

For presentations that are not [ACCME](#) accredited and are sponsored by [Non-CC Entities](#), Target Group [Staff, Employees](#) and [Trainees](#) will ensure that the following conditions are met:

- The presenter is the developer of the content of the talk and is responsible for, and agrees with, all aspects of the content or the presentation has a high educational value and the content is totally devoid of the mention of any drug (i.e. non-branded), drug product or device and is purely scientific in nature and the speaker is in agreement with all aspects of the content.
- The presenter ensures that the presentation cannot be interpreted as purely promotional of a particular product. The content must be accurate, data-driven and balanced with respect to current views.
- The presenter must disclose all relevant Financial Interests in [Non-CC Entities](#) at the beginning of the presentation.
- The presenter may accept honoraria for presenting and reasonable travel expenses and modest meals. Honoraria shall be commensurate with time and effort and meet fair market value standards.

- The presenter will appropriately credit collaborators and other sources of materials used in the presentation (e.g., slides, data, or videos).

Upon request, exceptions to these provisions may be permitted after review and approval by the Innovation Management & Conflict of Interest (IM&COI) Program, and where relevant, the Law Department. [See [Policy V, Consulting](#)]. If for example, FDA regulations require that the presenter use FDA-approved materials and these have been developed or provided by a [Non-CC Entity](#), the IM&COI Program would consider such a request, provided that the presentation's content is, in the presenter's best professional judgment, accurate, data-driven and balanced with respect to current views.

### **Gifts of Educational Materials from Non-CC Entities**

Other than philanthropic donations to the institution, which must be given in accordance with the policies and procedures of the Philanthropy Institute, gifts from [Non-CC Entities](#) are generally prohibited.

Single-use (consumable/disposable) items may be provided, but only in amounts necessary for adequate evaluation or education. Multiple-use products will only be provided for periods necessary for adequate evaluation or education. Items bearing commercial trademarks or logos are discouraged in patient care areas. Exceptions must be approved as specified in the Policies referred to above.

### **Trainees Supervised by Faculty with Non-CC Entity Relationships**

Target Group [Trainees](#) may not be involved in research projects in which the Target Group [Staff](#) supervisor of the research project or mentor of the Trainee has a [Significant Financial Interest](#) in the sponsor of the research or the maker of the product being evaluated, without approval from the IM&COI Program. Target Group Staff may not engage [Trainees](#) in research projects if the outcome of the research may jeopardize the Trainee's productivity or career development or if publication or communication of results is restricted. The stipend or payment received by the Target Group [Trainee](#) may not be dependent on the outcome of the research, nor may [Non-CC Entity](#) funding of the Trainee be dependent on the success of the company or its associated research endeavors. In all cases, Target Group [Staff](#) mentors must disclose to his/her Trainees all of his/her relevant Financial Interests with Industry.

### **Trainee Relationships with Non-CC Entities**

Target Group [Residents](#) and [Fellows](#) are subject to the same policies, rules, regulations, and procedures as Target Group [Staff](#) and [Employees](#) with regard to relationships with [Non-CC Entities](#).

Access to Target Group [Residents](#) and [Fellows](#) by industry representatives is permitted only with permission of the Trainee's direct supervisor. Such visits must be in accordance with accompanying IM&COI policies and the Pharmaceutical Representative Guidelines.

## **Oversight and Responsibility**

The Innovation Management and Conflict of Interest Program is responsible to review, revise, update, and operationalize this policy to maintain compliance with regulatory or other requirements.

It is the responsibility of each hospital, institute, department and discipline to implement the policy and to draft and operationalize related procedures to the policy if applicable.