



CONTINUING EDUCATION AND TRAINING OPERATIONAL PROCEDURES

Service Area: Teaching and Learning Support Services Program

INSTRUCTOR DISCLOSURE POLICY

SUBJECT: Instructor Disclosure Requirements for Transparency and Conflict of Interest Management

PURPOSE: To establish requirements for instructor disclosure of potential conflicts of interest, financial relationships, and other circumstances that might influence or appear to influence instruction, ensuring transparency, maintaining educational objectivity, and preserving the integrity of continuing education and training programs.

SCOPE: This policy applies to all instructors, facilitators, trainers, specialists, guest speakers, and any individual providing instruction or training content in Teaching and Learning Support Services programs, whether employed directly by the organization or contracted as third-party providers.

OPERATIONAL PROCEDURES:

1. DISCLOSURE REQUIREMENTS

A. Mandatory Disclosures All instructors must disclose:

- Financial relationships with organizations whose products, services, or positions may be discussed during instruction
- Research funding from entities that may be referenced in training content
- Consulting relationships or advisory board positions relevant to training topics
- Equity interests, ownership stakes, or stock holdings in relevant companies
- Speaking fees, honoraria, or other compensation from organizations related to training content
- Royalties or intellectual property licensing related to training materials
- Grant funding that supports research or activities related to training topics
- Professional relationships that may create actual or perceived conflicts of interest

B. Specific Disclosure Categories

- **Commercial Relationships:** Any financial or business relationship with commercial entities
- **Research Affiliations:** Funding sources for research discussed in training
- **Professional Activities:** Concurrent professional roles or consulting arrangements
- **Intellectual Property:** Ownership of materials, patents, or copyrights discussed in training
- **Personal Relationships:** Family or personal relationships that may influence instruction
- **Advocacy Positions:** Strong advocacy positions on controversial topics covered in training

2. DISCLOSURE DOCUMENTATION

A. Written Disclosure Forms



- All instructors must complete written disclosure forms before each training assignment
- Forms must be updated if circumstances change during the training period
- Disclosure forms will be maintained in instructor files for the required retention period

B. Disclosure Form Content The disclosure form must include:

- Instructor's name and role in the training
- Training program title and dates
- Detailed description of all potential conflicts of interest
- Financial amounts when applicable and not confidential
- Timeframe of relationships (current, within the past 12 months, etc.)
- Statement of how conflicts will be managed
- Instructor's signature and date

C. Documentation Review

- All disclosure forms will be reviewed by the Chief Program Officer or designated reviewer
- Additional information may be requested for clarification
- Approval must be obtained before instructor participation in training

3. PARTICIPANT NOTIFICATION

A. Advance Disclosure

- Relevant conflicts of interest will be disclosed to participants in advance of training when possible
- Disclosure information will be included in pre-training materials when significant conflicts exist
- Participants will be informed of their right to request additional information about instructor relationships

B. Training Session Disclosure

- Instructors must verbally disclose relevant conflicts of interest at the beginning of training sessions
- Written disclosure summaries will be provided to participants when appropriate
- Participants will be informed about how conflicts are being managed

C. Ongoing Disclosure

- If new conflicts arise during training, they must be disclosed immediately
- Updates to participant notifications will be provided as necessary
- Documentation of ongoing disclosures will be maintained

4. CONFLICT OF INTEREST MANAGEMENT

A. Conflict Assessment Each disclosed conflict will be evaluated for:

- Significance of the potential conflict
- Relevance to training content
- Impact on instructor objectivity
- Participant perception and trust
- Overall risk to program integrity

B. Management Strategies Depending on the assessment, conflicts may be managed through:



- **Disclosure Only:** For minor conflicts that do not significantly impact instruction
- **Content Modification:** Adjusting training content to minimize conflict impact
- **Co-Instruction:** Pairing instructor with someone without conflicts
- **Independent Review:** Having content reviewed by individuals without conflicts
- **Instructor Replacement:** Replacing instructor when conflicts cannot be adequately managed

C. Ongoing Monitoring

- Instructor compliance with conflict management strategies will be monitored
- Participants will be encouraged to provide feedback on instructor objectivity
- Regular review of conflict management effectiveness will be conducted

5. SPECIFIC DISCLOSURE SCENARIOS

A. Product or Service Promotion

- Instructors with financial interests in products or services must disclose these relationships
- Clear distinction must be made between educational content and promotional material
- Alternative products or services must be discussed when relevant
- Participants must be informed that no purchase or use is required

B. Research Presentations

- Funding sources for presented research must be disclosed
- Methodology limitations and potential bias must be acknowledged
- Competing research findings should be presented when available
- Personal involvement in research must be clearly stated

C. Proprietary Methods or Materials

- Instructors teaching their own methods or using their materials must disclose ownership
- Evidence base for proprietary approaches must be clearly presented
- Alternative approaches should be discussed
- Commercial availability and costs should be disclosed if relevant

6. THIRD-PARTY INSTRUCTOR REQUIREMENTS

A. Contractual Obligations

- All contracts with third-party instructors must include disclosure requirements
- Contractors must agree to comply with organizational disclosure policies
- Disclosure forms must be completed before contract execution
- Ongoing disclosure obligations must be specified in contracts

B. Verification Procedures

- Third-party instructor disclosures will be independently verified when possible
- References and background checks may include conflict of interest inquiries
- Ongoing monitoring of third-party instructor compliance will be conducted

7. PARTICIPANT RIGHTS AND REMEDIES

A. Information Access

- Participants have the right to request additional information about instructor conflicts
- Detailed disclosure information will be provided upon request



- Participants may request alternative instruction if conflicts are of concern

B. Complaint Procedures

- Participants may file complaints about inadequate disclosure or conflict management
- Complaints will be investigated promptly and thoroughly
- Appropriate remedial action will be taken when violations are found

8. ENFORCEMENT AND CONSEQUENCES

A. Policy Violations Failure to comply with disclosure requirements may result in:

- Immediate removal from teaching assignments
- Termination of employment or contracts
- Exclusion from future teaching opportunities
- Reporting to relevant professional organizations
- Legal action when appropriate

B. False or Incomplete Disclosures

- Intentionally false or misleading disclosures will be treated as serious policy violations
- Participants affected by inadequate disclosure may be offered remedial training
- Public disclosure of policy violations may be made when appropriate

9. POLICY ADMINISTRATION

A. Training and Education

- All instructors will receive training on disclosure requirements
- Regular updates will be provided on policy changes and best practices
- Examples and case studies will be used to illustrate proper disclosure

B. Record Keeping

- All disclosure forms and related documentation will be maintained securely
- Records will be retained according to organizational record retention policies
- Confidential information will be protected while maintaining transparency requirements

C. Policy Review

- This policy will be reviewed annually and updated as necessary
- Input from instructors, participants, and other stakeholders will be considered
- Changes in applicable laws and professional standards will be incorporated

10. RESOURCES AND SUPPORT

A. Guidance and Consultation

- Instructors may consult with the Chief Program Officer regarding disclosure questions
- Legal counsel may be consulted for complex conflict situations
- Professional organizations' guidance on conflicts of interest will be referenced

B. Disclosure Form Templates

- Standardized disclosure forms will be provided to all instructors
- Electronic submission systems may be implemented for efficiency
- Forms will be regularly updated to reflect policy changes



****This procedure shows SSFCs' commitment to providing continuing education and training that is objective, evidence-based, and free from inappropriate commercial influence or conflicts of interest. All instructors must disclose potential conflicts of interest and relevant relationships that might influence or appear to influence their instruction. This transparency ensures that participants can evaluate information in proper context and maintain public trust in the quality and integrity of educational programs.**

POLICY/PROCEDURE AUTHORIZATION

Adopted	July 1, 2025
Last Revised	September 24, 2025
Approved by	CEO, President or Vice President of Programs
Signature	<i>Louis Finney Jr.</i>
Date	12/4/2025