

DEPARTMENT: Ethics and Compliance	POLICY DESCRIPTION: Publication Conflicts of Interest Disclosures
PAGE: 1 of 2	REPLACES POLICY DATED:
EFFECTIVE DATE: October 1, 2019	REFERENCE NUMBER: EC.027
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: This policy applies to each of the following to the extent they Publish in a Medical Journal or Present at a Medical Conference: HCA Healthcare Employed Physicians, HCA Healthcare Medical Directors and HCA Healthcare Chief Medical Officers (together, the “Covered Physicians”).

POLICY:

When Covered Physicians Publish in a Medical Journal or Present at a Medical Conference, they are expected to disclose their financial relationships in accordance with applicable laws, regulations, rules, policies and procedures related to such disclosures (“Disclosure Rules”). The Disclosure Rules may include, without limitation, those of the institutional review boards (also known as independent ethics committees, ethical review boards or research ethics boards), professional societies (such as the American Medical Association and the Accreditation Council for Continuing Medical Education), the Medical Journals or Medical Conferences in which such material will be published or presentations made and, in the case of research sponsored by the federal government, the requirements of the specific agency funding the research (for example, the National Institutes of Health, the Food and Drug Administration, and the Centers for Disease Control and Prevention). If a Covered Physician Contract is entered into, renewed or amended after the effective date of this policy, it shall include a notification of this policy.

DEFINITIONS:

“Covered Physician” has the meaning given to it in the Scope section of this policy.

“Covered Physician Contract” means a medical director, Chief Medical Officer or employment agreement with a Covered Physician.

“Disclosure Rules” has the meaning given to it in the Policy section of this policy.

“HCA Healthcare Affiliate” means any entity which is ultimately controlled by HCA Healthcare, Inc.; such affiliates shall include, but not be limited to, PSG, any HCA Healthcare inpatient or outpatient facility and any HCA Healthcare division or corporate office.

“HCA Healthcare Chief Medical Officer” means a Physician who is contracted with HCA Healthcare to provide services as a Chief Medical Officer.

“HCA Healthcare Employed Physician” means a Physician who is employed by HCA Healthcare, Inc. or an HCA Healthcare Affiliate (together, “HCA Healthcare”).

“HCA Healthcare Medical Director” means a Physician who is contracted with HCA Healthcare to provide services as a medical director.

DEPARTMENT: Ethics and Compliance	POLICY DESCRIPTION: Publication Conflicts of Interest Disclosures
PAGE: 2 of 2	REPLACES POLICY DATED:
EFFECTIVE DATE: October 1, 2019	REFERENCE NUMBER: EC.027
APPROVED BY: Ethics and Compliance Policy Committee	

“Medical Conference” means an assemblage of health professionals and/or the general public at which medical information is communicated.

“Medical Journal” means a journal or other publication which communicates medical information to physicians and other health professionals, or to the general public, regardless of whether published on paper, online or electronically.

“Physician” means any person who is a doctor of medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of optometry, or chiropractor.

“Present” means to be a speaker, panelist or moderator at a Medical Conference.

“Publish” means to author, co-author, edit or peer review any content of a Medical Journal.

REFERENCES:

Accreditation Council for Continuing Medical Education (ACCME): <http://www.accme.org/>
American Medical Association (AMA): <https://ama-assn.org/>