



CONTINUING MEDICAL EDUCATION POLICY AND PROCEDURE MANUAL

OFFICE OF CONTINUING MEDICAL
EDUCATION

NUMBER: 11.0

SUBJECT: Commercial Support/Disclosure

ORIGINATION DATE: 3/92

CURRENT REVISION DATE: 2/05

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SUBJECT: Commercial Support and Disclosure of Relationships

Element 3.3 The Provider must present CME activities in compliance with ACCME's policies for disclosure and commercial support.

Eastern Virginia Medical School adheres to the **ACCME 2004 Standards for Commercial Support: Standards to Ensure the Independence of CME Activities**. In operational issues the CME Program at EVMS is guided by what is in the best interest of the public, and decisions are made with the principles of **independence from commercial interests, transparency** and keeping **CME separate from product promotion**.

STANDARD 1: Independence

1.1 EVMS-CME ensures that CME activity content is free of control of a "commercial interest" including the identification of CME needs; determination of objectives; selection and presentation of content; selection of all persons and organizations that will be in the position to control the content of the CME; selection of educational methods; and evaluation of the activity.

1.2 EVMS does not jointly sponsor CME activities with a commercial interest.

STANDARD 2: Resolution of Personal Conflicts of Interest

2.1 Relevant financial relationships with commercial interests of everyone who is in the position to control the activity content must be disclosed. Relationships in any amount and occurring within the past 12 months that create a conflict of interest are to be disclosed.

2.2 Individuals who refuse to disclose relevant financial relationships will be disqualified from being a planning committee member, a teacher, or an author of CME and cannot have responsibility for the development, management, presentation or evaluation of the CME activity.

2.3 EVMS will identify and resolve all conflicts of interest prior to the CME activity taking place, using the policy, "**Identifying and Resolving Conflicts of Interest in CME**".

STANDARD 3: Appropriate Use of Commercial Support

3.1 EVMS makes all decisions regarding the disposition and disbursement of commercial support and all funding must be received by EVMS to support the expenses associated with EVMS sponsored activities.

3.2 EVMS is not required to accept advice or services from the commercial interest regarding teachers or content as conditions of contributing funds or services. Content development must remain beyond the control of the commercial supporter. Content validation by the provider should be established.

3.3 EVMS must be aware of all commercial support associated with the CME activity and must approve all such support. EVMS and its agents (joint sponsors) must decide what commercial support will be accepted and how it will be utilized, not the commercial interest.

Written Agreement documenting terms of support

3.4 EVMS and the commercial supporter will have a written agreement indicating the terms, conditions, and purposes of the commercial support for all directly and jointly sponsored activities.

3.5 The Letter of Agreement specifies the commercial interest at the source of the commercial support.

3.6 The Letter of Agreement must be signed by the commercial supporter and the provider (EVMS CME representative).



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Expenditures for an individual providing CME

3.7 EVMS adheres to its policy “Honorarium and Expense Reimbursement” which governs honoraria and reimbursement of out-of-pocket expenses for planners, teachers, and authors of CME activities. **Honorarium amount is set by the course director.**

3.8 EVMS CME is responsible for payment of honoraria and expense reimbursement in compliance with policy governing such.

3.9 No additional payment may be given to the director of the activity, planning committee members, teachers or authors, joint sponsor, or any others involved with the supported activity.

3.10 When teachers or authors also participate as a learner their expenses can be paid for their teacher or author role only.

Expenditures for learners

3.11 Social events or meals at CME activities will not take precedence over the educational events and will be planned by CME staff or designee.

3.12 Commercial support funds are used to underwrite the expenses for developing and presenting the activity, including expenses of teachers and staff working on the activity.

Accountability

3.13 EVMS maintains all income and expense documentation related to its directly and jointly sponsored activities. This will detail the receipt and expenditure of the commercial support.

STANDARD 4: Appropriate Management of Associated Commercial Promotion

4.1 Commercial exhibits or advertisements cannot interfere with the presentation nor be a condition of the provision of commercial support.

4.2 Product promotion material or product specific advertisement of any type is prohibited during CME activities. Staffed exhibits and/or presentations or enduring printed or electronic ads must be kept separate from CME. Adherence to the **2004 Standards for Commercial Support Standard 4.2** is required.

4.3 Educational materials such as slides, abstracts and handouts cannot contain any advertising, trade name or product message.

4.4 The program book which contains non-CME elements that are not directly related to the transfer of education may include product promotion material or product specific advertisement.

4.5 Commercial interests cannot provide a CME activity to learners either by distribution of self-study activities or arranging for electronic access to CME activities. The commercial supporter may distribute promotional materials developed by the provider.



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STANDARD 5: Content and Format without Commercial Bias

5.1 EVMS CME activities and related materials promote improvements or quality in healthcare and not a specific proprietary business interest of a commercial interest.

5.2 Presentations must give a balanced view of therapeutic options and use generic names when possible; or use multiple trade names, not the trade name from a single company. CME must be free of commercial bias and not promote products or services, but promote improvements in healthcare.

STANDARD 6: Disclosures Relevant to Potential Commercial Bias

Relevant financial relationships of those with control over CME content

6.1 Individuals must disclose to the learners all relevant financial relationships, including the name of the individual, the name of the commercial interest, and the nature of the relationship. Disclosure is preferred to be written and available to all learners. Verbal disclosure may be used to supplement written disclosure when the event is televised.

6.2 Disclosure must also be made when the individual has indicated no relevant financial relationships.

Commercial support for the CME activity.

6.3 The source of commercial support must be disclosed to learners, and the “in-kind” support must include specific information about the actual support, e.g. equipment loan.

6.4 Trade names or product group message must never be included in such disclosure.

Timing of disclosure

6.5 Disclosure of relationships and support by a commercial interest must be provided to the learners **prior to the beginning of the educational activity.**