Standards for Commercial Support™: Standards to Ensure Independence in CME Activities
A worksheet for this session is on page 45 of your Syllabus.
What is the most important concept that we need to know with respect to CME and industry?
CME is Independent

PLANNING CRITERIA

C2. needs …that underlie …gaps
C3. … designed to change
C5. … formats … appropriate
C6. … desirable physician attributes
C7-10 SCS

How do we keep commercial bias out of education?
Content Validation

• Based on accepted evidence
• Research …must conform
• Benefit >> Risk
• Not ineffective
• Scientific basis
Does that mean ACCME-defined commercial interests can play no role in accredited CME?
Ensuring Independence

How do you ensure that your educational activities and your CME program are not influenced by commercial interests?

“The Standards for Commercial SupportSM: Standards to Ensure Independence in CME Activities”
Criterion 7: Independence

The provider develops activities/educational interventions independent of commercial interests. (SCS 1, 2, and 6)

“... cannot receive guidance from commercial interests, either nuanced or direct, on the content of the activity or on who should deliver that content.”

SCS 2: Resolution of COI

$\$ Relationship

Content

SCS 6: Disclosures Relevant to Potential Commercial Bias

- 6.1 Disclose relevant $\$ relationship(s)
- 6.2 If no relationships exist
- 6.3 Source of commercial support
- 6.4 No trade names or messages
- 6.5 Before the beginning
Case #1

Mercy Hospital’s CME Committee has decided to create an enduring material related to one of the hospital’s key quality measures. The CME staff gather disclosure information from all of the Committee members before their annual planning meeting. When reviewing that disclosure information, staff finds that the husband of Dr. Jones – one of their Committee members – is employed by a commercial interest. The content of the enduring material that they will be planning is directly related to the business lines of that commercial interest.

The Committee discusses this issue and decides that since they are now aware of Dr. Jones’ potential conflict, she will not be allowed to author the content of the enduring material. Because there are multiple committee members that will contribute to the planning, there is no need to remove her from the planning process.

Does this solution meet ACCME’s expectations for independence? Why or why not?
Medical Leadership Today is a medical education company whose program of CME addresses physician leadership skills and faculty development – no healthcare goods or services are discussed.

The provider has determined that they do not need to gather disclosure information because there is no opportunity for a conflict of interest.

Does this meet ACCME’s expectation for identifying COI? Why or why not?
Case #3

The CME Coordinator from Long Branch County Hospital emails all ten of the speakers for their upcoming Annual Pediatrics Conference. He asks them to respond to him, listing their relationships with "any proprietary entity producing health care goods or services."

Once he has gathered all of their information, he forwards it to the CME Committee Chair to review and assess if any of their mechanisms for resolution of conflict of interest need to be enacted.

*Does this meet ACCME’s expectation for resolving COI? Why or why not?*
Case #4

National Physician Membership Association uses a disclosure form to gather information about financial relationships from all planners and faculty. The individual completing the form indicates if he/she has a financial relationship with an ACCME-defined commercial interest, and if so, what mechanism he/she will employ to resolve the resulting conflict of interest.

Does this meet ACCME’s expectation for identifying and resolving COI? Why or why not?
Case #5

At the top of the handout materials for a monthly Grand Rounds activity, the provider has included the following information:

“None the members of the Western Medical School CME Committee, who planned this CME Activity, have any financial relationships to disclose relating to the content of this activity. In addition, Dr. Jones, who is presenting for this session, has no relevant financial relationships to disclose.”

Does this meet ACCME’s expectation for disclosure to learners of relevant financial relationships? Why or why not?
Criterion 8

The provider appropriately manages commercial support
(if applicable, SCS 3 of the ACCME SCS).

- 3.1 Decisions
- 3.2 No advice or services
- 3.3 Knowledge and approval
- 3.4 Written agreement
- 3.5 Specify the CI
- 3.6 Both...must sign
- 3.7 Honoraria
- 3.8 Pay directly
- 3.9 No other payment
- 3.10 Expenses
- 3.11 Social events or meals
- 3.12 Not for non-teachers
- 3.13 Document $$
Case #6

During the week following their Annual Conference, the National Specialty Association is reviewing their documentation for the meeting, which was commercially supported by educational grants from Companies A, B, and C.

- For Companies A & B, the provider has a letter of agreement signed by both the commercial supporter and one of their staff members.

- For company C the provider has a copy of the agreement that it completed electronically when they were awarded the grant.

Does this meet ACCME’s expectation for the appropriate use of commercial support? Why or why not?
Criterion 9

**The provider maintains a separation of promotion from education (SCS 4)**

4.1 ... cannot influence planning or interfere with the presentation or be a condition of ... commercial support

4.2 Prohibited in or during CME activities....

4.3 Educational materials .... cannot contain any advertising, trade name or a product-group message.

4.4 Non-CME elements .... may include product-promotion material or product-specific advertisement.

4.5 A provider cannot use a commercial interest as the agent providing a CME activity to learners...
Case #7

• For each of the past 10 years, PharmaCo has both been a major exhibitor (“Silver Level”) at National Specialty Association’s (NSA) Annual Meeting, and has provided commercial support for a CME symposium on new approaches for treating heart disease.

• At another cardiology meeting, a Brand Manager from PharmaCo mentions to NSA that they may reduce the size of their exhibit hall sponsorship this year.

• NSA sends an e-mail to PharmaCo’s Medical Education Director explaining that PharmaCo may not be eligible to provide grant support for the CME symposium if they don’t exhibit at the “Silver Level.”

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Does this meet ACCME’s expectation for the separation of promotion from education? Why or why not?
Criterion 10

The provider actively promotes improvements in healthcare and NOT proprietary interests of a commercial interest (SCS 5).

SCS 5: Content and Format without Commercial Bias

5.1 ….must 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...generic names will contribute to this impartiality... not just trade names from a single company.