

Policy on Compliance with the ACCME Standards for Commercial Support

PURPOSE

It is the policy of the Sunrise Health System Office of CME to not certify commercially-supported activities. This means neither a joint-provider nor Sunrise Health System Office of CME can submit grant requests or receive funding from a commercial interest to support any portion of the CME program. According to the ACCME, a commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests.

A commercial interest is not eligible for ACCME accreditation. Commercial interests cannot be accredited providers and cannot be joint providers. Within the context of this definition and limitation, the ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME:

- 501-C Non-profit organizations (Note, ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system, nor can they serve in the role of joint provider.)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

Accredited CME providers are accountable for ensuring the independence of CME. We have implemented this policy to more completely manage the risks inherent with providing CME accreditation for activities.

INDEPENDENCE

In accordance with the ACCME Standards for Commercial Support, (SCS) Sunrise Health System (SHS) develops its CME activities independent of any commercial interest. Under **no circumstances** will SHS consult with commercial interests to validate the content of the activity through any of the following:

- Identification of practice gaps and needs that become the foundation for the activity;
- Preparation of or input into the learning objectives;
- Selection and presentation of content;
- Recommendation of persons to serve as faculty for the activity or any other persons that will be in the position to control the content of CME;
- Influence over the selection of the educational design for the activity;
- Selection of vendors or methods for the evaluation of the activity; and
- Technical review of the content of the CME activity.

MANAGEMENT OF FUNDS

1. CONTROL OF FUNDS

SHS Office of CME controls all aspects of the management of funds. No funds will be requested or accepted from commercial supporters through SHS Office of CME. Joint-providership applications that indicate requesting or accepting funding from commercial supporters shall be denied CME accreditation through Sunrise Health System Office of CME.

- If a speaker honorarium is to be paid, the amount is set by the Education and Library (E & L) Committee at the beginning of the activity planning process and within the estimated activity budget. Criteria that will be taken into account when setting an honorarium will include the individual's background, the level of honoraria for the discipline, the amount of effort entailed, and funds available in the SHS CME general ledger account. The E & L Committee has set and approved the fee associated with this professional service agreement as reasonable and comparable to similar services within our market and is at fair market value compared to nationwide and local CME honoraria.
- If a presenter also participates in the educational activity as a learner, his or her expenses shall be reimbursed, and honorarium paid for his or her presentation only.
- All honorarium and reimbursement of expenses are paid to a speaker from the Sunrise Health System CME general ledger account.

- The Office of CME staff completes a check request and submits the corresponding paperwork to the appropriate parties [including, but not limited to: Ethics and Compliance, Director of Medical Staff Services/CME/Library Services, President and CEO, HCA Legal Department, and Accounts Payable]. The Office of CME submits the completed packet to the accounting department. The accounting department sends a check to the speaker.
- Reimbursements for activity related expenses are processed upon submission of receipts by the speaker in the same manner as honorarium checks. Receipts are submitted to the Office of CME staff in accordance with the *Travel Reimbursement Policy*.
- No funds will be requested or accepted from commercial supporters through Sunrise Health System Office of CME. Joint-providership applications that indicate requesting or accepting funding from commercial supporters shall be denied CME accreditation through Sunrise Health System.
- Funds to pay faculty honorarium and/or travel expenses is provided solely through the Office of CME general ledger account; unless otherwise stipulated in the Letter of Agreement generated by the legal department. No payment is provided to the Education and Library (E & L) Committee members, Activity Director, Planning Committee members, Joint Provider/Educational Partner, CME staff, or any other person involved with the planning or production of the activity.
- Facilitators/Course Directors for regularly scheduled series are not paid an honorarium nor reimbursed for travel expenses.
- Questions concerning honorarium and expense reimbursement should be directed to the Office of CME.

2. ADDITIONAL FUNDS PROVIDED TO THOSE IN POSITIONS TO CONTROL CONTENT

SHS Office of CME and/or its joint providers do not provide additional payment to those in a position to control content relative to the specific CME activity.

3. PROVISION OF FUNDS TO LEARNERS

SHS Office of CME does not provide funds to offset the costs of attending CME activities for its learners. Such honoraria and expense support is provided only to faculty associated with the activity.

4. SOCIAL EVENTS

Social events that take place at a CME activity may not compete with or overtake the CME activity, nor can they be funded by commercial support. SHS permits only modest meals at its CME activities for the purpose of promoting interaction and exchange between faculty and learners.

5. TRANSPARENCY TO LEARNERS

SHS Office of CME does not accept commercial support for any of directly sponsored or joint providership CME activities. Such information is made transparent to learners by publishing this information on announcements and sign in sheets for each CME activity.

SEPARATION OF EDUCATION FROM PROMOTION

1. PROMOTION OF PROPRIETARY INTEREST OF COMMERCIAL INTERESTS

SHS assures that activities do not promote the interests of product manufacturers through the following safeguards:

- **Activities Linked to Analyses of Learner Gaps and Other Needs**—CME activities are planned based on clear gaps in knowledge and/or performance, the expert opinions of recognized experts in the field, national guidelines or authorities' description of best practices.
- **Content Validation Practices**—The content of CME activities is vetted by an independent reviewer so as to assure that commercial bias is not present and that the material is scientifically accurate, based on evidence acceptable to the profession, and that treatments discussed are appropriate. SHS has a standard form for this purpose.
- **Retrospective Learner Feedback**—Evaluation mechanisms always contain questions that serve to demonstrate that learners did not perceive commercial bias in the materials from a specific presenter. If a bias is perceived, this information is provided to the planners, faculty and others so that an improvement plan can be implemented and outcomes of the improvements monitored.

2. COMMERCIAL EXHIBITS

- SHS Office of CME does not permit exhibits to be present at any CME activity, either directly sponsored or through joint providership.
- Exhibits are not permitted in the educational room within the space of educational content.

3. ADVERTISING

- **IN LIVE ACTIVITIES**—No commercial interest is permitted to advertise its products and/or services within the confines of a CME activity. SHS Office of CME does not permit subtle advertising by having conference bags, pens, or other accoutrement that bears names of any manufacturers and/or its products within the educational space.
- **IN JOURNAL-BASED ACTIVITIES**—Advertising cannot be within the confines of the article or on any partial page of that article certified for AMA PRA Category 1 credit. Furthermore, advertising is not permitted in other parts of the official CME activity, such as post-tests, evaluations, and general CME information pages.

4. APPEARANCE OF PRODUCT GROUP MESSAGES IN COURSE MATERIALS

No product group messages are permitted in any CME activity certified by SHS. Given the nature of how learners perceive such messages, steps taken to assure compliance with this policy include:

- Use of generic scientific names for product descriptions instead of product names.
- Insistence of fair balance in discussion of treatment options in which all drugs in a class are compared and contrasted, with treatment recommendations being reviewed by content reviewers to assure that recommendations made are based on verifiable studies and in the public interest.
- Logos from commercial interests are never permitted on any course materials including slides, syllabus materials, and other non-educational interventions.

5. THE ROLE OF THE COMMERCIAL INTEREST OR SUPPORTER IN THE PROVISION OF CME TO LEARNERS

SHS Office of CME does not accept commercial interest for any CME activities, either directly sponsored or through joint providership.

COLLECTION AND RESOLUTION OF CONFLICTS OF INTEREST AND TRANSPARENCY TO LEARNERS

1. COLLECTION OF COI INFORMATION

SHS Office of CME collects financial relationship information from all persons in a position to influence the content of CME in any amount from (a) faculty, (b) planners, (c) reviewers, (d) advisors, and (e) staff from SHS or any educational partner. Information requested is obtained through a standard Conflict of Interest (COI) Information document that is distributed to all concerned parties prior to an educational activity. Information from disclosure forms is analyzed by staff under the direction of the Office of CME staff, the Activity Director, and the Education and Library Committee, and a mechanism to resolve reported conflicts is selected.

2. RESOLUTION OF REPORTED COI

SHS Office of CME requires that everyone who is in a position to control the content of an educational activity discloses all relevant financial relationships with any commercial interest. Parties affected by this policy include faculty, planners, reviewers, advisors, and staff. The ACCME defines "relevant" financial relationships" as financial relationships in any amount occurring within the past 12 months that create a conflict of interest. When COI is present, course materials such as slides and syllabus material are reviewed by the Activity Director or his/her designee. Should resolution not be possible through content review, presenters may be asked to limit their presentation to the presentation of scientific information only, or in some cases the presenter may be replaced by another expert with less COI. Resolution of COI, including changes that were identified in materials, is maintained in the files for the activity.

3. TRANSPARENCY TO LEARNERS

COI information for each presenter, reviewer, planner, and anyone in a position to influence the content is made transparent to learners. COI disclosure is published in announcements and sign in sheets so that it may be viewed by learners prior to the start of the activity. COI disclosure may also be presented as a slide in the PowerPoint presentation.