

Standards for Commercial Support & Continuing Education

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The course director, planners, and faculty of this activity have no relevant
financial relationships to disclose.

- Apply the ACCME Standards for Commercial Support to continuing education activities.
- Recognize what is a “relevant financial relationship” for CE faculty.
- Discuss ways in which an individual’s potential conflict of interest can be resolved.
- Discuss the purpose of oversight of commercial interest in continuing education.

1. Introduction to Interprofessional Continuing Education
2. Overview of Standards
3. Standards for Commercial Support
4. Summary and conclusions

The office of Interprofessional Continuing Education (IPCE)

Oversees all accredited continuing education delivered by Rush.

- Qualify credits for traditional, ***profession-specific*** CE.
- Allows providers of CE programming that is ***interprofessional*** to qualify those credits with a single application process administered by IPCE.
- In 2016, the IPCE office moved forward with the application process for ***Joint Accreditation*** with the Accreditation Council for Continuing Medical Education (ACCME), the American Nurses Credentialing Center (ANCC), and the Accreditation Council for Pharmacy Education (ACPE).

IPCE provides independent oversight.

An essential component of any CE, for any profession, is assurance to the learner that the educational content is based on best evidence and free of any commercial influence.

Overview of the Standards for Commercial Support

First, what do we mean by “commercial interest” and “commercial support”?

Commercial Interest: any entity either producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients or an entity that is owned or controlled by an entity that produces, markets, re-sells or distributes health care goods or services consumed by, or used on, patients.

Commercial Support: financial or in-kind support for continuing education provided by a commercial interest organization.

What do we mean by a “relevant financial relationship”?

An individual’s relationship to a commercial entity is relevant if the products or services of the commercial interest are related to the content of the education.

Includes receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (stock and stock options), grants, contracts, directly or indirectly from the commercial interest.

Also may include consulting, speaking, teaching, membership on an advisory committee or review panel, board membership -- anything from which remuneration is received or expected from the commercial interest.

NOTE: Relationships with any commercial interest by an individual’s spouse/partner may be relevant.

Guidelines, Standards, Codes and Policy

- Dec 1990 ◻ AMA Guidelines on Gifts to Physicians
- Mar 1992 ◻ ACCME Standards for Commercial Support (SCS)
- **Dec 1997** ◻ **FDA Final Guidance on Industry-Support Scientific and Educational Activities**
- Jul 2002 ◻ PhRMA Code – Interactions with HCPs
- **Apr 2003** ◻ **OIG Compliance Program Guidance**
- Nov 2003 ◻ AdvaMed Code
- Jan 2004 ◻ Revised ACCME SCS
- May 2007 ◻ US Senate Report Ed Grants and Pharma
- Aug 2007 ◻ ACCME Revised Policies
- **July 2008** ◻ **Revised PhRMA Code – Interactions with HCPs**

Building on guidelines that the ACCME first issued in 1987 and formally adopted in 1992, all major accrediting bodies in healthcare continuing education now follow the same set of standards.



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INTERPROFESSIONAL CONTINUING EDUCATION

Since IPCE is responsible for compliance with the ACCME Criteria, ANCC Commission on Accreditation, the ACPE, and the Illinois Department of Professional Regulation, it must oversee all continuing education activities.

Six broad Standards assure compliance:

1. Independence;
2. Resolution of personal conflicts of interest;
3. Appropriate use of commercial support;
4. Appropriate management of promotion;
5. Content/format without commercial bias;
6. Disclosures relevant to potential bias.

In addition, there are policies and procedures particular to Rush and Rush employees that IPCE oversees, such as:

- Payment of honoraria;
- Selection of appropriate faculty.

IPCE, Course Directors,
planners and faculty work in
cooperation to assure
adherence to the Standards.

Standards for Commercial Support

Standards 1-6 in Detail



Financial relationship is not relevant if it's with a non-profit or government organization, *or* if it's a non-health care related company.

Standard 1 – Independence

All decisions re: content and format are made free of the control of any commercial interest, most specifically:

- ID of learning needs;
- Determination of learning objectives;
- Selection of educational content and faculty;
- Selection of educational format;
- Evaluation of the learning experience.

Standard 2 – Resolution of Personal COI

- *Any* person in a position to control or influence educational content must disclose *all relevant financial relationships* within 12 months that might create a COI.
- *Any* potential COI must be resolved *prior* to that person continuing in his/her role in the educational activity.
- Refusal to disclose results in disqualification in planning, managing, or teaching.

Standard 3 – Appropriate Use of Commercial Support

- *Any* financial support from a commercial entity can *only* be provided in the form of an unrestricted educational grant.
- Receipt of commercial support is dependent upon the execution of a Letter of Agreement (LOA) between Rush and the commercial entity providing funding. *Drafting and execution of the LOA must be done in consultation with IPCE.*
- Commercial interest organizations *may not* exhibit, promote or sell products or services during introductions, while the activity takes place, or at the conclusion of an educational activity, regardless of the format.

Standard 3 – Appropriate Use of Commercial Support

At times, live events have associated commercial exhibit space (i.e. vendor booths).

- Exhibit space must be distinctly separate from the educational space.
- Exhibitors may not exhibit, promote or sell products or services in the educational space at any time.
- Fees for exhibit space are determined by the activity planners based on fair market value.
- Exhibitor income requires an agreement with IPCE to document the terms.

Standard 4 – Appropriate Management of Promotion

IPCE must oversee product-promotion material or product-specific advertising.

- Live events – Ads *cannot* be part of educational materials, such as slides or abstracts. Complimentary materials, such as schedules and content descriptions, may include product-promotion material or ads.
- Print or Online – Ads *cannot* be interleaved within the pages of the educational content. Ads or product-promotion materials can only appear before or after the educational content.
- Post-tests and education evaluation forms are elements of an activity, and *must not* contain advertising, trade names, or product group messages.

Standard 5 – Content and Format Without Commercial Bias

IPCE will assist/oversee development of the content and the format chosen for its delivery.

- Content and delivery format (i.e. live lecture, online material) must be designed to address identified learning needs of practitioners derived from professional practice gaps in knowledge, competence or performance.
- Content developed must be objective, balanced, based on valid and sound scientific studies, and free of commercial bias.

Standard 5 – Content and Format Without Commercial Bias

Selection of education planners and faculty are part of content development, done in cooperation with IPCE.

- Faculty are the professionals responsible for teaching, authoring, or otherwise communicating the activity content to learners. They should be *documented experts* in the subject.
- Commercial employees may *not* serve as planners of CE.
- Commercial employee may be permitted to serve as presenter *only* on the early phases of translations of new information and/or technology into first use. Commercial employees *cannot* teach about their specific products.

Standard 5 – Content and Format Without Commercial Bias

How does IPCE resolve potential COI, and assure independent content?

Use of a standardized disclosure form.

If COI identified, person may alter financial relationships. Course Director may alter person's control over content. IPCE may designate content for independent peer review. Or select other mechanisms of resolution.

Standard 6 – Disclosures to Learners Relevant to Potential Bias

Prior to the start of the educational content, learners must be informed of:

- *Any relevant* financial relationship(s) on part of faculty, planners and/or Course Director;
- *The absence of relevant* financial relationship(s) on part of faculty, planners and/or Course Director;
- *The source of all support* from commercial interests (financial or in-kind).

Standard 6 – Disclosures to Learners Relevant to Potential Bias

When acknowledging commercial support –

- No commercial logos
- No trade name or trademark
- No product-group message

Summary & Conclusion

When you are unsure, ask IPCE

Standards for commercial support

IPCE must be involved in the oversight of all commercial support.

Commercial support is financial or in-kind contribution given by a commercial interest and which is used to pay all or part of the costs of an educational activity.

Remember:

Anyone in control of educational content must disclose the presence or absence of all relevant financial relationships with commercial interests.

A relationship does not disqualify you from participating in education. However, your relationship must be *disclosed* and, if there's a potential conflict, *resolved*.

The Standards are in place to assure:

use of best evidence to develop CE;
independence of content experts;
that CE addresses genuine needs of
learners.

The Standards are not punitive.

CE has sometimes been used to advance personal economic interests. Standards are in place to assure learners and the public of CE's independence.

For more discussion of issues, see...

...the accreditation criteria for Joint Accreditation

<http://www.jointaccreditation.org/accreditation-criteria>

“ACCME Bans Corporate Logos”, commentary from Thomas Sullivan - Policy & Medicine blog, April 24, 2014.

<http://www.policymed.com/2014/04/accme-to-ban-corporate-logos.html>

Steinbrook R. Financial support of continuing medical education. JAMA 2008;299(9):1060-1062.

Please contact IPCE with any questions
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And submit your CE questions by e-mail:
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