

Stanford CME Policy on Commercial Support: FAQs

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GUIDING PRINCIPLE

This policy is intended to insure that Stanford Continuing Medical Education (CME) activities are free from commercial influence, based upon the best scientific evidence available, and designed to change physician competence, performance-in-practice and/or patient outcomes.

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COMMERCIAL SUPPORT

How is commercial support defined?

Commercial support is financial or in-kind contributions given by a commercial interest and used to pay all or part of the costs of a CME activity. "In-kind" refers to the loan or donation of equipment, supplies and/or services from a commercial entity. The material provided must be a product of the donating company.

What constitutes a commercial interest in relation to CME?

A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Also included are professional conference organizers who receive financial support from a commercial entity to support CME activities.

What type of CME activity is covered under this policy?

This policy applies to all ACCME accredited CME activity at Stanford. The term CME specifically indicates ACCME accredited activities including all courses and symposia and regularly scheduled series such as grand rounds, case conferences, M&Ms, tumor boards, journal clubs as well as enduring educational materials (e.g. CDs, DVDs, online activities) for which AMA PRA Category 1 credit™ is awarded.

What about non-accredited CME activities?

Guidelines for all non-CME accredited educational activities at Stanford School of Medicine are incorporated in the Stanford Industry Interactions Policy (SIIP) (<http://med.stanford.edu/coi/siip/policy.html>).

What is the policy on commercial support to Stanford CME?

Since September 1, 2008, new direct commercial funding for specific CME activities is not allowed. This includes activities held either on the Stanford campus or at offsite venues and all functions that propose to use the Stanford name. This also includes payments from third party sources or for-profit course organizers who have received industry support.

Does this policy prohibit Stanford faculty from participating in non-Stanford sponsored CME?

This policy does not intend to constrain faculty participation in CME sponsored by other non-profit entities (e.g. national organizations, educational institutions or government). In such activities, faculty may use their individual institutional affiliation. Faculty may undertake curriculum leadership roles in CME sponsored by non-profit entities so long as it relates to the ordinary mission of the sponsoring organization and could not be perceived as a relocation of educational activity that ought to be sponsored by Stanford.

Can commercial entities still support Stanford continuing medical education?

Yes, industry may provide CME program support. It may be designated for use in a broadly defined field of study, but not designated to a specific subject, course or activity. Support from industry for accredited CME will be considered in the following general categories:

- *Medical, pediatric and surgical specialties*
- *Diagnostic and imaging technologies and disciplines*
- *Health policy and disease prevention*
- *Other broadly defined topic areas*

Such industry support cannot be designated for a specific course or activity, but effort will be made to direct support, as appropriate, to the specified general areas of interest listed above. Industry support for accredited CME programs must be directed to the Stanford Center for CME.

Who makes requests to companies for commercial support?

Requests for commercial support for accredited CME must be submitted to potential commercial supporters by the Center for CME. Faculty should work together with the CME staff to prepare commercial support requests. Proposals must address a broadly defined area of medical knowledge (e.g. quality improvement, disease prevention, health policy, innovative educational methods).

The policy covering criteria for requests for commercial support of non-accredited educational activities is described in the SIIP policy (<http://med.stanford.edu/coi/siip/policy.html>).

Who can sign letters of agreement for commercial support?

All agreements for commercial support of accredited CME must be executed by the Associate Dean for Postgraduate Medical Education or designees.

How do I apply for an allocation from the central commercial support pool?

Application for resources is made to the CME faculty advisory council via a proposal describing the specific educational activity. The format for this is available from the Center for CME.

What is “in kind” support?

“In kind” refers to the loan or donation of equipment or supplies as well as services from a commercial entity. The material provided must be a product of the donating company.

Can an accredited CME activity receive “in kind” support?

Once a course has been approved by the Stanford Center for CME, certain types of in-kind support may be permitted, upon prior approval by the Associate Dean of Postgraduate Medical Education, so long as no marketing activity is associated with their use. When multiple products are available, every effort must be made to ensure broad inclusion of equipment from competing commercial interests.

Can commercial funds designated for CME later be used for other purposes?

Commercial funds contributed in support of Stanford CME must be expended exclusively on Stanford CME activities.

Can unrestricted commercial donations to departments (or other school entities) be used to support an accredited CME activity?

Commercial funds may be used in support of accredited CME activities only if specifically donated to the SOM CME Central Funds pool as defined above and in the CME Commercial Support Policy.

What types of support are permitted for specific CME activities?

Donations from individuals, foundations, and charitable organizations that have no commercial bias may be designated for support of a specific CME activity.

How can we acknowledge commercial support?

Because directed commercial support is not permitted, a general statement listing all commercial supporters to the Stanford CME curriculum will be issued by the Center for CME on a regular basis. In-kind commercial support is acknowledged for individual CME activities.

COMMERCIAL EXHIBITS

Are commercial exhibits allowed?

Exhibits by commercial organizations are not permitted at CME activities whether at Stanford or at off site locations. The only exception is medical book vendors.

COMMERCIAL INTERACTION RELATING TO CME ACTIVITIES

Can commercial employees instruct in CME activities?

Only under narrowly defined circumstances may a commercial employee be permitted to serve as an instructor in Stanford CME activities. In those instances, the commercial employee may instruct on basic science only and may not discuss products or patient care recommendations. These instances must have prior approval by the Associate Dean for Postgraduate Medical Education and must be closely monitored by course leadership.

Can commercial employees serve as technical assistants in Stanford certified CME courses?

As a general rule, commercial employees are not permitted to assist in CME. When a commercial employee is essential to operating a piece of equipment critical to the educational mission, upon prior approval by the Associate Dean for Postgraduate Medical Education, this may be permitted with the proviso that neither indications for use nor comparisons among competing products are discussed. Marketing and/or promotional activities must not take place. Commercial employees who provide technical assistance are required to sign Stanford's attestation/disclosure form. It is the responsibility of course leadership to appropriately monitor the CME activity.

Can commercial employees attend Stanford CME courses?

Yes, but only for their own personal education. They must pay full tuition, wear a conference name badge, wear no commercial identifiers (e.g. corporate logos), and engage in no sales or promotional activity.

Can company logos and slogans be used?

All CME syllabi, brochures, course websites, lecture slides, etc. must be entirely free of commercial marketing or product messaging such as logos, slogans, etc.

Can brand names be used during CME activities?

Descriptive terminology rather than brand names for pharmaceuticals (i.e. generic chemical names) and medical technologies and devices should be employed. To avoid learner confusion, it is permissible to introduce a brand name in conjunction with its generic equivalent if this promotes learning.

Can Stanford CME activities be marketed on company websites?

No. This is not permitted because it could be misunderstood to imply a relationship that does not exist.

Can meals and social events occur at CME activities?

Modest meals and social events may accompany a CME activity, but commercial sponsorship is prohibited and commercial employees may not attend except as individual paid registrants in the course (see above). Meals and social events may not be longer, more important or more costly than the educational activity.

ADMINISTRATION OF CME

Are departments allowed to independently coordinate and manage accredited CME courses?

No, effective September 1, 2008 all accredited CME activity is managed through the Stanford Center for CME.

Why must all certified CME activities be administered by the Stanford Center for CME?

Adhering to ACCME requirements for accreditation has become extremely complicated and time consuming. Maintaining accreditation with a dispersed compliance program is problematic. Since the Center for CME bears the responsibility for accreditation and issuance of certification, it must administer Stanford CME activities.

When can the Stanford name be used in relation to a CME activity?

Only CME activities fully compliant with SOM commercial support policies and administered through the Stanford Center for CME may use the Stanford name. Permission to use the Stanford name for CME activities must be approved by the Stanford Center for CME.

Can another accredited entity sponsor a Stanford CME activity?

No. All CME activities sponsored by Stanford must use Stanford SOM as their accredited provider.

Can Stanford CME activities be jointly sponsored?

Stanford does not jointly sponsor CME activities. Collaboration with ACCME accredited providers is allowed. To avoid inconsistencies in policy, educational collaborators (other ACCME accredited providers) may not accept commercial support for CME activities planned with Stanford. All commercial support funds for activities in which Stanford participates must flow from the Stanford CME central pool.

Stanford CME controls all aspects of the management of funds from a commercial entity. Even in cases in which there is an educational collaborator, Stanford is a signatory to the Letters of Agreement and is in full control of all decisions and agreements relative to such funds.

How will decisions be made in terms of course curricula?

Proposals for courses must be submitted to the Stanford Center for CME by a Stanford faculty member. All proposals will be reviewed by the Stanford CME Accreditation Manager, the Executive Director and the Associate Dean. Decisions will be made based on identified practice gaps, quality indicators, strategic initiatives, innovative and novel learning techniques and/or targeted health outcomes.

Who may serve as a Course Director?

For reasons of financial accountability and adherence to Stanford policies, Course Directors must be full-time faculty members employed by the Stanford School of Medicine. Non full-time faculty and community practitioners with voluntary clinical appointments may participate as a course co-director in concert with a full-time Stanford School of Medicine faculty member.

It is expected that Course directors familiarize themselves with Stanford CME policies including: Commercial Support, Honorarium, Identification and Resolution of Conflicts of Interest and Venue. The CME staff and Associate Dean are available to answer any questions regarding these policies which are found at cme.stanford.edu.

DISCLOSING AND RESOLVING CONFLICTS OF INTERESTS

What financial relationships need to be disclosed?

Financial relationships relevant to the specific CME content must be disclosed. These relationships include those of the individual and spouse or significant other that have occurred within the last 12 months, and are of any financial benefit (no minimum dollar amount).

How should contracted research grants from commercial entities be disclosed?

All contracted research with commercial entities must be disclosed. Contracted research includes research funding where the institution gets the grant and manages the funds and the person who must disclose is the principal or named investigator on the grant.

Who needs to disclose financial relationships?

The CME faculty and anyone else with influence over the CME content must disclose. This includes course planners (both faculty and staff), moderators, reviewers or others who have control or influence over content.

When do individuals involved in CME activities need to disclose relevant financial relationships?

Financial relationship disclosures for the CME planners must be transmitted to the Stanford Center for CME before the planning process begins. Disclosures from the entire CME activity faculty must be submitted at least 30 days before the course.

When should reportable conflicts of interest be disclosed during the program?

Relevant financial relationships of faculty and planners must be disclosed to the learners prior to the activity. If the activity is online, the disclosure information must be provided before the learner enters the CME content.

What is meant by resolving a conflict of interest?

ACCME requires that relevant conflicts be formally evaluated and resolved by course leadership prior to the commencement of the activity. This will include review of course material for signs of commercial bias and revision if it is detected. Review must be conducted by a non-conflicted faculty member or course director.

What is course leadership responsibility if a member of the faculty is perceived to present commercially biased material?

If during an educational activity, course leadership detects commercial bias, it is their responsibility to discuss this with the learners in order to ensure that a fair and balanced program is in place.

PROMOTION OF CME ACTIVITIES

In promoting CME activities, what venue information can be included (e.g. hotel, resort, conference center)?

Other than listing the name and location of a non-Stanford venue, as required for registration purposes, images or descriptions of the venue are not allowed. A venue website address may be included for learners to obtain additional information. Use of Stanford imagery in CME promotion is encouraged.

Can marketing for CME activities contain tourist information?

No, Stanford CME marketing must focus exclusively on educational content. As such, promotional material may not include destination imagery (e.g. palm trees, the Golden Gate Bridge) or images of recreational activities (e.g. surfing, skiing). Images included in promotional material should be related to the course content.

Can we begin to promote our planned CME activities (e.g. brochures, websites) whenever we want to?

With the exception of a “save the date” notice which includes only name, date and location with no reference to CME credit, no promotion may occur until the course application has been approved for credit.

Can faculty participate in the design and distribution of promotional material?

Yes, faculty involvement in the promotional process is encouraged. However, before distribution, all promotional materials must be approved by the CME office.

HONORARIA FOR CME ACTIVITIES

What are the CME rules concerning honoraria for non-Stanford faculty?

Invited faculty may receive an honorarium in addition to covering all of their customary travel expenses (in accordance with Stanford guidelines). An honorarium of up to \$1000 per CME teaching day may be awarded up to a maximum of \$2000 per CME activity.

What are the CME rules concerning honoraria for Stanford faculty?

An honorarium is supplemental personal compensation. Stanford faculty may be paid honoraria for participating in Stanford CME activities. Granting of an honorarium must be approved by the recipient's department and by Educational Programs and Services (EPS). Honoraria greater than \$1,000 for CME activities are appropriate only for exceptional effort or in exceptional circumstances. Such honoraria must first be approved by the Associate Dean for Postgraduate Medical Education.

A faculty member's academic enrichment account, which may be used for discretionary expenditures according to University rules, may also receive payment for CME activity. Payment of honoraria or supplements to academic enrichment accounts to Stanford faculty is contingent upon adequate funds being available after all course expenses have been met.

Expenses related to participation in a CME activity (e.g. out-of-pocket travel, meals, and lodging) will be reimbursed. All pertinent rules and regulations set by Stanford University apply (such as per diem limits and mileage reimbursement rates). For details, see Administrative Guide Memo 36.7 on Travel Expenses and the Stanford Controller's Office information on Travel Expense Reimbursement.

Can CME revenue support a Stanford faculty member's salary?

Revenues derived from CME activities may be used to reimburse a faculty member's department for time spent on CME only under exceptional circumstances. To be eligible, a sizable fraction of the faculty member's teaching effort must be committed to CME. Departmental reimbursement for fractions of a Stanford faculty member's salary must be approved by the Associate Dean for Postgraduate Medical Education and can only be paid after all other course expenses have been met.

WHERE SHOULD I DIRECT MY QUESTIONS?

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