

**I. Policy**

Commercial Grants & Exhibits

**II. Purpose**

- A. To allow collection of commercial grants to help support the financial aspects of CME while following all ACCME Standards for Commercial Support to ensure the CME activity is free from commercial bias.
- B. All CME grants must be given and accepted with the knowledge that a commercial company may not control or influence the content, speaker selection, or any other part of an *AMA PRA Category 1 Credit™* CME activity in any way.

**III. Definitions**

- A. ACCME – Accreditation Council for Continuing Medical Education is the nationally recognized accrediting agency for continuing medical education.
- B. *AMA PRA Category 1 Credit™* – AMA’s Physician’s Recognition Award Credit System; also, referred as Category 1 CME.
- C. CMA – California Medical Association is an advocacy organization active in the legal, legislative, reimbursement and regulatory areas on behalf of California physicians and their patients.
- D. CME – Continuing Medical Education: Educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public, or the profession.
- E. CME Provider – Hospitals, professional societies and other entities that provide accredited CME to physicians.
- F. Commercial Grants – The money or in-kind payment given to the CME Provider by a proprietary company that has a product or service available in the medical industry.
- G. Commercial Interest – “A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.”
- H. IMQ – Institute for Medical Quality is a subsidiary of CMA and has been designated by ACCME as California’s intrastate accrediting agency.
- I. Standards for Commercial Support (SCS) – ACCME guidelines that govern all aspects of commercial support and disclosure in order to insure independence of the CME Provider in planning activities.

#### **IV. Text**

- A. Accredited providers often receive financial and other support from non-accredited commercial organizations. Such support can contribute significantly to the quality of CME activities. ACCME developed the Standards for Commercial Support to describe appropriate behavior of accredited providers in planning, designing, implementing and evaluating CME activities for which commercial support is received.

#### **V. Procedure**

- A. The CME Committee will accept educational grants from commercial companies for continuing medical education (CME) activities under the following guidelines:
- B. The CME Committee will accept commercial support in the form of educational grants for CME activities.
- C. All commercially supported activities are for scientific and educational purposes only and are not to promote any company's products directly or indirectly.
- D. The CME Committee will be ultimately responsible for control of content and selection of faculty. A commercial company will not be allowed or asked to suggest or invite faculty for any CME activity.
- E. Commercial support will never be used to pay honoraria or expenses for participants who are not teachers or authors.
- F. The CME activity content will not be scripted or influenced by the supporting company or its agents.
- G. No promotional activities or product advertisements will be permitted in the same room or obligate pathway immediately before, during or after the educational activity.
- H. The CME Committee will make every effort to ensure that data outlined within the faculty's presentation regarding any company's products or competing products are objectively selected and presented including favorable and unfavorable information and alternative treatments.
- I. The faculty will disclose limitations of data, such as ongoing research, analysis, preliminary data, off-label use of medications, or unsupported opinion.
- J. The speaker shall disclose any use of a drug or device that is used for an indication not FDA approved, also known as "off-label" use.
- K. Support from the commercial company must be in the form of an educational grant made payable to the hospital, or in the case of a joint-sponsorship, it may be payable to the joint-sponsor. Grant support may never be made payable to any planner or faculty. The provider will negotiate all payment arrangements with the faculty.
- L. An Administrative fee, food costs, and marketing costs may be requested from

commercial companies providing educational grants.

- M. A representative from the commercial company giving the educational grant, the CME Coordinator or designee, and the joint sponsor (if one) must both sign the official agreement called Letter of Agreement.
- N. Publicity for the activity will include statements that the activity has received commercial support in the form of an educational grant from (name of company).
- O. Commercial company products will not be mentioned in the publicity.
- P. At the time of the activity, full disclosure will be made either verbally or in writing of each company providing a grant.
- Q. If a commercial company representative desires to attend an activity his/her company supports, there shall be a limit of one representative present during the activity without prior permission from the CME Coordinator.
- R. Each learner will be asked to evaluate if the activity is free of commercial bias.
  - 1. The CME Committee members, in reviewing the CME Evaluation Summary report, will also discuss the faculty's compliance with commercial support guidelines. In part, this consideration shall be based on whether 10% or more of learners indicate there was commercial bias in the presentation, which will be interpreted as non-compliance with these guidelines. In the event an activity has been determined to be non-compliant, a letter shall be sent to faculty advising him/her of the findings of the CME Committee.
- S. When an activity is an enduring material, the following guidelines will be followed:
  - 1. Commercial support grant information will be posted on the first and last page or there will be a Grantor link that will be displayed on all pages.
  - 2. No grantor product or product-group information will be present on any CME scientific pages.

## **VI. References**

- A. ACCME Standards for Commercial Support
- B. IMQ/CMA CME Accreditation Standards Manual

## **VII. Cross-References**

- A. Disclosure
- B. Relevant Financial Relationship/Conflict of Interest Policy
- C. CME Honorarium and Reimbursement Policy

## **VIII. Associated Documents**

- A. Planner Disclosure Form
- B. Faculty Disclosure Form
- C. Content Validation Form
- D. Letter of Agreement

**IX. Approvals**

- A. CME Committee
- B. Medical Executive Committee
- C. Board of Directors

March 15, 2012, March, 2017  
April 10, 2012, April 11, 2017  
April 17, 2012, April 25, 2017