CME Program – Commercial Support Guidelines

Purpose: These guidelines are intended to ensure that CME activities provided by PNWU’s Office of University of Continuing Medical Education (OUCME) are free from commercial influence, based upon the best scientific evidence available, and designed to change physician competence, performance, and/or patient outcomes. PNWU CME activities must comply with the Standards for Commercial Support.

NOTE: PNWU currently does not accept support from commercial interests for any CME activities provided by the OUCME.

Definitions:

• Commercial interest is any entity producing, marketing, reselling, or distributing health care goods or services consumed by, or used on, patients.

• Commercial support is defined as financial or in-kind contributions given by a commercial interest, which is used to pay all or part of the costs of an educational activity.

• In-kind refers to the loan or donation of equipment, supplies, and/or services from a commercial entity.

Scope: These guidelines encompass all forms of physician education certified for CME by PNWU, whether held on or off campus (i.e. conferences, regularly scheduled series, enduring materials, etc.).

Independence: All decisions in the planning and implementation of a CME activity must be made without the control or influence of commercial interests. These include:

1. identification of needs
2. determination of educational objectives
3. selection of presentation and content
4. selection of faculty, planning committee members, and organizations that will be in a position to control the content of the activity
5. selection of educational methods
6. evaluation of the activity

A commercial interest will not be permitted to take the role of a non-accredited partner in a jointly sponsored relationship.

The following related documents must be utilized when planning CME activities:

• CME Program - Conflict of Interest Policy
• CME Program - Disclosure Guidelines & Disclosure/Conflict of Interest Form
• CME Program - Clinical Content Validation Policy & Clinical Content Certification
• CME Program - Social Events Policy & Social Events Checklist
• CME Program - Advertising & Promotion Policy
NOTE: If PNWU does accept support from commercial interests for any CME activities provided by the OUCME in the future, then a policy will be implemented. The following items address potential directives that may be incorporated into a future policy for the appropriate solicitation and management of commercial support for CME activities.

OUCME staff and designated representatives may solicit commercial support to assist with the cost of CME activities. Commercial support will be solicited from multiple companies who manufacture similar products relating to the CME topic. Commercial support from a single company will only be received in cases where that company is the sole manufacturer of a product or where other manufacturers decline participation. Commercial support will be sought and administered in accordance with the Standards for Commercial Support (SCS), other related policies of the OUCME, and the following procedures:

1. **Appropriate Use and Documentation of Commercial Support:** The OUCME and the CME Committee make decisions regarding the planning and development of educational activities, including content validity, disposition, and appropriate disbursement of commercial support. All commercial support associated with a CME activity must be given with full knowledge of PNWU-designated associate(s). The OUCME will coordinate with the Chief Advancement Officer and Accounting Department for appropriate routing of funds.

2. **Letter of Agreement:** A Letter of Agreement must be signed by both commercial supporter and PNWU stating the terms, conditions, and purposes of the commercial support, even if the support is given directly to PNWU’s educational partner or joint sponsor.

3. **Appropriate Management of Associated Commercial Promotion:** PNWU may provide opportunities for commercial exhibits and advertising at its discretion and within the following provisions:
   a. OUCME or delegate will arrange commercial exhibit placement and will not allow placement to be a condition of the provision of commercial support.
   b. PNWU will not permit promotional activities (exhibits or presentations) to occur in the same space or place as the educational activity.
   c. PNWU will not permit product-promotion materials or product-specific advertisements to be placed in or during CME activities nor in or on educational materials such as slides, handouts, etc. This does not apply to information distributed about the non-CME elements of a CME activity that are not directly related to the transfer of education to the learner.

4. Direct payment of a CME expense by a commercial source is prohibited. Commercial support in the form of an unrestricted educational grant must be made payable to Pacific Northwest University of Health Sciences.

5. PNWU will not permit a commercial interest to serve as the agent providing a CME activity to learners, e.g. distribution of self-study CME activities or arranging for electronic access to CME activities.

6. **Attendance at CME Activities:** Representatives of commercial companies may attend CME activities as passive learners and guests without charge. This includes companies
not represented by monetary support as well as those companies that support the activity via educational grants.

7. **Disclosures Relevant to Potential Commercial Bias:** PNWU requires everyone in a position to control the CME content to complete a Disclosure/Conflict of Interest Form indicating any relevant financial relationships (or lack thereof) including the name of the individual with the relationship, the name of the commercial interest(s), and the nature of the relationship the person has with each commercial interest. Disclosure information must be submitted to the OUCME in ample time for review by a designated monitor.

8. The source of all support from commercial interests must be disclosed to learners prior to the beginning of the educational activity and must include in-kind contributions. Disclosure may not contain the use of trade names or product-group messages. CME activity promotional materials and handouts or syllabus materials will, as a matter of routine, include acknowledgment of commercial support. In the case of course handouts and enduring materials, such acknowledgement will be placed in the introductory sections of those materials so that participants will see this information prior to the commencement of the activity.

9. If a faculty member does not provide disclosure information prior to the deadline for printed materials, that information will be disclosed verbally at the live activity prior to the faculty member’s presentation. A designee must verify in writing that verbal disclosure was made.

10. PNWU will routinely issue a faculty letter that, among other things, advises faculty of requirements relative to the Standards for Commercial Support, including the preparation of unbiased, fair-balance, and scientifically rigorous presentation; and the requirement to disclose both financial relationships with the commercial supporter(s) of the activity for which their presentation is relevant as well as the manufacturers of products discussed in their presentation.