



Island Health Guidelines for Commercial Support of Continuing Medical Education/Continuing Professional Development Activities

The following document outlines the guiding principles pertaining to the support of VIHA sponsored activities as well as programs including but not restricted to courses, conferences, workshops, continuing education of approved rounds, internet courses, and the production of learning resources, e.g. CD ROM or videotape by health care or educational commercial sponsors (e.g. pharmaceutical companies, instrument, and device manufacturers).

These guidelines are adapted with permission from the 2009 University of British Columbia's Division of Continuing Professional Development *Guidelines for Commercial Support of Continuing Medical Education/Continuing Professional Development Activities*.

These guidelines comply with the recommendations in the following documents:

- Canadian Medical Association policy on “Physicians and the Pharmaceutical Industry” (Update 2007)
- The College of Family Physicians of Canada Mainpro+ accreditation criteria
- Royal College of Physicians and Surgeons of Canada MOC accreditation criteria
- American Medical Association Ethical Opinion on “Gifts to Physicians from Industry” (December, 1998)
- Accreditation Council for Continuing Medical Education for “Standards for Commercial Support” (August 2007)
- UBC Policies and Procedures (August 2009) www.universitycounsel.ubc.ca/policies/policies.html

Preamble

The primary objective of professional interactions between physicians and commercial supporters should be for the advancement of the health of the population rather than the private good of either physicians or industry. The primary purpose of Continuing Medical Education/Continuing Professional Development (“CME/CPD”) activities is to address the educational needs of physicians and other health care providers in order to improve the health care of patients. It is the responsibility of VIHA to ensure that any educational activity is designed primarily for that purpose.

Island Health and community CME/CPD providers often receive financial and other support from commercial sponsors. Such support can contribute significantly to the quality of CME/CPD activities but must avoid potential bias or the perception of it. The purpose of this document is to describe the guiding principles that VIHA will meet in planning, designing, implementing, and evaluating CME/CPD activities for which commercial support was received.

The selection of educational topics, speakers, and course materials must be based upon the clinical needs of the patient population as well as the educational and professional development needs of physicians, and must not be influenced by commercial sponsors.

To ensure clinical scientific integrity, the selection of topics, speakers, course materials, and content and use of enduring materials are entirely the responsibility of the designated course coordinator or organizer. If a commercial sponsor recommends a resource person or speaker, he or she must be acceptable to the course coordinator and the planning committee. The invitation to participate must emanate from the course coordinator and not from the commercial sponsor. All members of planning committees must abide by the principles set out in this document and participate without introducing commercial bias.

All Island Health CME/CPD activities must be free of any real or perceived commercial bias.

When Island Health is the primary sponsor or organizer of a CME/CPD activity, the following principles will apply:

➤ Assistance with preparation of educational materials

The content of slides and reference materials must remain the ultimate responsibility of the presenter selected to provide the CME/CPD activity. A commercial sponsor may be asked to help with the preparation of conference-related educational materials, but these materials must not, by either content or format, advance the specific proprietary interests of the commercial sponsor. The distribution of promotional materials with the course registration package or during educational sessions will not be permitted unless they are judged unbiased by Island Health CPD/KT or the course coordinator and his/her planning committee and clearly include only those things related to instruction.

➤ Assistance with educational planning

The acceptance by the course coordinator and his/her planning committee of advice or services from the commercial sponsor concerning speakers, invitees, or other educational matters including content, educational objectives, selection of educational methods, and evaluation of the activity must not be among the conditions of providing support by a commercial sponsor. The final decision on the involvement of any participant must be made independently of the commercial sponsor by the course coordinator and his/her planning committee.

➤ Repeated CME/CPD activities

Commercially supported Island Health CME/CPD activities must meet with the standards set out in this document each time the activity is offered.

All CME/CPD activities must be free of commercial bias towards a particular product or therapy.

Topics may not be product or promotion-oriented, and presentations must give a balanced view of all relevant therapeutic options available. For example, generic product names should be used where possible. When trade names are employed, it is preferable to use the trade names of several companies rather than that of a single commercial sponsor. Any unapproved therapy or research protocols mentioned in a CME/CPD activity should be explicitly identified as such in the presentation.

A registration fee must be charged for all CME/CPD activities that would normally have a registration fee associated with them.

A commercial sponsor must not cover the entire cost of a CME/CPD activity. Commercial support may help reduce the cost of registration, but a registration fee should be paid by the participants in order to avoid a perceived or real influence on learning. Payments to defray the costs of an activity should not be accepted directly from any company by physicians attending the activity. Exceptions to this general principle might include rounds, established professional meetings, faculty development activities and research-oriented continuing education activities since these activities would normally be carried out without charge to participants. Any exceptions to these principles are at the sole discretion of the CPD office or designate.

Island Health medical staff presenters and visiting speaker payments must be consistent with that which would be made in the absence of commercial sponsorship.

Any payment to visiting speakers or Island Health medical staff presenters may not be made directly by commercial sponsors. All funds from commercial sponsors must be in the form of unrestricted educational grants made payable to Island Health CPD. Specifically, a visiting speaker or Island Health medical staff member may not be directly sponsored by or receive gifts from commercial organizations while taking part in a CME/CPD activity sponsored by Island Health. It is appropriate for presenters at conferences, meetings, rounds or other events to accept reasonable honoraria and/or reimbursement for reasonable travel, lodging, and meal expenses. It is also appropriate for consultants who provide genuine services to receive reasonable compensation and accept reimbursement for reasonable travel, lodging, and meal expenses. Token consulting or advisory arrangements cannot be used to justify the compensation of physicians for their time or travel, lodging, and other out-of-pocket expenses.

Registrants must not receive payment from commercial sponsors for attendance at CME/CPD activities.

Commercial sponsors should not pay for or underwrite travel or lodging costs or other personal expenses of physicians, their spouses, or family members attending a VIHA CME/CPD activity. Subsidies for hospitality should not be accepted outside of modest meals that are provided as part of an activity. Scholarships or Special Funds may be accepted to permit Medical Students, Residents, or Fellows in accredited programs to attend CME/CPD activities as long as these funds are approved by their program chair, director, or designate and paid through the relevant program/department.

The extent and nature of commercial support at a CME/CPD activity must be in keeping with the educational intent of the activity.

Since all funds from commercial interests must be in the form of unrestricted educational grants, subsidies specifically designated for hospitality should not be accepted. Social events at a CME/CPD activity must not compete with nor take precedence over educational events. The approved educational activity must clearly have greater importance and time duration than any associated social activities. In general, travel and accommodation arrangements, social events, and venues for industry sponsored CME/CPD activities should be in keeping with arrangements that would normally be made without commercial sponsorship.

All parties must fully disclose all monetary support, expenditures, and avoid potential conflicts of interest relevant to that CME/CPD activity.

This principle applies to Island Health CPD as well as all faculty members; visiting speakers and program planning committee members participating at any Island Health sponsored, co-sponsored, or accredited CME/CPD activity. The CME/CPD course coordinators or their designate(s) are responsible for conveying

to the participants any potential conflicts declared by the speakers or planning committee members and any funding received in support of them prior to the beginning of the educational activity. A process must also be in place to manage all identified conflicts of interests for both speakers and planning committee members. Speakers and planning committee members must fully disclose any affiliation (financial or otherwise) with a commercial or other industry interest that they, their spouse or close family members have with respect to information being presented at a CME/CPD event. In particular, for the 2-year period prior to a CME/CPD activity, all presenters and course planners must disclose the following with respect to any company whose interests are in the area(s) covered by the educational material:

- Any direct financial interest in the company;
- Ownership interest in the company (i.e. stocks, stock options, or other ownership interest, excluding diversified mutual funds);
- Membership on the company's advisory board or similar committee(s);
- Involvement in research sponsored by the company;
- Participation in clinical studies sponsored by the company or using products produced by the company;
- Involvement in the design of clinical studies concerning the use of products manufactured by the company;
- Honorarium, consulting fees, salary, royalty, grant-in-aid ("restricted" or "unrestricted"), or other monetary support received from or expected from the company;
- Ownership of a patent for a product referred to in the presentation or marketed by the company.

Any other financial ties that may have a direct or indirect connection to the content of a CME/CPD presentation should also be disclosed. For Royal College of Physicians and Surgeons of Canada (RCPSC) study credits, all industry financial relationships (not just those relevant to the subject being discussed) must be disclosed.

Following any Island Health CME/CPD activity, upon request, information should be provided to each commercial sponsor and any other relevant party concerning the specific expenditure of the funds it has provided.

The presence of commercial displays must not influence CME/CPD activities.

When commercial exhibits are part of the program, they should not influence the planning nor interfere with the presentation of CME/CPD activities. Exhibits (including banners, which name products) may not be placed in the same room as the educational event, and commercial sponsors may not influence exhibit placement as a condition of support for a CME/CPD activity. The commercial sponsor may be thanked publicly, and its representatives may attend the educational activity, but in a capacity defined by the course coordinator or organizer. Representatives of commercial interests must not engage in sales or promotional activities during the CME/CPD activity. A single commercial organization may

sponsor a course and provide a relevant exhibit of its products as long as it abides by the foregoing principles.

Satellite symposium influenced by commercial interests must be clearly separated from any approved CME/CPD activity.

“Satellite” symposia are separate meetings often associated with conferences and other CME/CPD activities. These symposia are frequently produced by commercial interests and are not in compliance with these commercial support guidelines. Registrants may perceive such “satellite” programs as integral to the approved event and be unaware of commercial bias. Thus, conference organizers must take care to ensure that:

- a) Registrants at the approved program are aware that such satellite symposia are not approved by Island Health CPD;
- b) Such activities are promoted (marketed or “branded”) in a way which clearly identifies the satellite activity as distinct from the approved event;
- c) The satellite symposia are separated temporally and if possible, spatially from the approved event.

The RCPSC has declared that as of January 2010, the term “satellite symposium” will be restricted to unaccredited group learning events (Section 2), and that satellite symposia should not be listed or included within conference brochures or schedules.

Electronic CPD (eCPD) must comply with the same guidelines which apply to live events.

Electronic or eCPD generally refers to accredited online or internet-based CME/CPD content or educational activities. For all eCPD activities, the following principles must be followed:

- Authors of eCPD modules are equivalent to faculty presenters at face to face CME/CPD events and are ultimately responsible for ensuring the content and validity of these modules. They should ensure that they are both designed and delivered at arm’s-length of any industry sponsors.
- Authors of eCPD modules should be selected for their expertise in the subject area (clinical or non-clinical) being discussed. All authors and members of the planning committee must disclose all relationships with the sponsors of the module or any competing interests (see guideline #8 above) at the beginning of the eCPD event.
- There should be no direct links to an industry or product website on any web page which contains eCPD material. If a link to any sponsor’s website is provided then physician participants must be informed that if they click on such a link they will leave the eCPD host site completely and must log back in.
- Information related to any activity carried out by the eCPD participant should only be collected, used, displayed or disseminated with the express informed consent of that participant.
- The methodologies or links to studies cited in the eCPD material should be available to participants to allow them to evaluate the quality of the evidence discussed. Simply presenting abstracts that preclude the participant from evaluating the quality of evidence should be

avoided. When the methods of cited studies are not available in the abstracts, they should be described in the body of the eCPD module.

- If the content of the eCPD module is modified in any way, re-accreditation is required.

The evaluation of a CME/CPD activity must allow participants to indicate if any commercial bias was perceived.

Following any CME/CPD activity, an evaluation form to assess speakers and the overall program must include a question concerning the possibility of commercial bias such as “*Did you perceive commercial bias in any aspect of the program?*” Island Health CPD will have the right to audit any approved CME/CPD activity to ensure compliance with the guidelines in this document.

Acknowledgements must avoid bias towards particular sponsors or products.

Acknowledgements should simply mention the name(s) of the commercial sponsor(s). The acknowledgement must not mention or suggest any endorsement of the commercial sponsor or its product(s). Advertising commercial products by name or indication is not permitted. Commercial sponsors may not be listed in the schedule of activities or close to the list of faculty members. In addition, the following guidelines apply:

- Course brochures: Unrestricted educational grants and commercial sponsors may be acknowledged in course brochures under “Acknowledgements”. Commercial sponsors must not be listed on the front of brochures.
- Posters, flyers, and one-page brochures: Commercial sponsors may be acknowledged at the bottom of the document in an unobtrusive manner.
- Websites and other electronic formats: in a one-page or one-screen format, commercial sponsors may be acknowledged at the bottom of the page or screen in an unobtrusive manner. In a multi-page or multi-screen format, commercial sponsors must not be acknowledged on the main (home) page. Links to commercial sponsors or product websites may not be established on any webpage with educational material. If a link to any commercial sponsor’s website is provided then physician participants must be informed that if they click on such a link, they are leaving the host site completely and must log back in.
- In printed CME/CPD handouts or syllabi, advertisements, and promotional materials may not be interleaved within the pages of the CME/CPD content. They may be inserted at the end of the syllabus, not facing any content, and clearly marked as advertising/promotion.

Please direct enquiries relating to these guidelines to:

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This document will be the official guiding principles for VIHA with regard to commercial support for CME/CPD activities and reviewed every 3 years.

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Glossary of Terms

Commercial Sponsors

“Commercial sponsors” are defined as any proprietary entity producing or profiting from health care or educational goods or services, with the exemption of non-profit or government organizations and non-health care/non-educational related companies.

Financial relationships

Financial relationships are those relationships in which the individual benefits by receiving a salary, grants or research support, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected. There is no set minimal dollar amount for relationships to be significant. Inherent in any amount is the incentive to maintain or increase the value of the relationship. Financial relationships of immediate family members shall also be considered.

Immediate Family

For the purposes of this guideline, immediate family members shall mean to include spouse, child(ren), parent(s) and/or partner.

Commercial Bias

Commercial bias is defined as an unfair influence or distortion of the facts. In its commonest form it presents as a commercial slant to the benefit of a particular manufacturer of pharmaceuticals or health care technologies that may result in application of knowledge gained in a physician’s professional practice that is not necessarily beneficial to patients.

Conflict of Interest

Circumstances that create a conflict of interest occur when an individual has an opportunity to affect Continuing Medical Education/Continuing Professional Development content relating to products or services of a commercial interest with which he/she has a financial relationship.

Unrestricted Educational Grants

Unrestricted educational grants are sources of revenue provided to physician organizations to support the development of CME/CPD activities or materials without any conditions or influence from the donor regarding the design, development, delivery and content of the activities or materials.