



Standards for Commercial Support of AAPA CME Activities

AAPA endorses and applies *ACCME Standards for Commercial Support: Standards to Ensure Independence in CME Activities* to AAPA's processes and procedures. The following Standards are adapted from ACCME's standards, available here: <http://www.accme.org/requirements/accreditation-requirements-cme-providers/standards-for-commercial-support>

1. Independence

- A. CME provider must ensure that the following decisions were made free from control or influence of a commercial interest or a commercial interest's surrogate:
 - identification of CME needs
 - determination of educational objectives
 - selection and presentation of content
 - selection of all individuals and organizations that will be in a position to control content of the CME
 - selection of educational methods
 - evaluation of the activity
- B. A commercial interest or its surrogate may not take the role of a non-accredited partner in a joint provider relationship.

2. Content and Format Without Commercial Bias

- A. The content and format of a CME activity and/or its related materials must promote the interests of patients/patient care, improvements or quality in healthcare and not a specific proprietary business interest of a commercial interest or its surrogate.
- B. Presentations must give a balanced view of therapeutic options. Use of generic names is preferred to contribute to impartiality. If the CME educational material or content includes trade names, where available, trade names from several companies should be used.

3. Disclosures Relevant to Potential Commercial Bias

- A. Faculty, educational planning committee members, and other individuals determined to hold a position requiring disclosure of relevant financial relationships must disclose to the learners:
 - name of individual
 - name of commercial interest(s),
 - nature of the relationship the individual has with each commercial interest
- B. If an individual has no relevant financial relationship(s), learners must be informed that no relevant financial relationship(s) exist.
- C. Learners must be informed of the source of all commercial support for an educational program. When commercial support is "in kind", the nature of the support must be disclosed.
- D. 'Disclosure' must never include the use of a corporate logo, trade name or product-group

message of an ACCME-defined commercial interest (see glossary for definition of “commercial interest”.)

- E. A Provider must disclose the above information to learners prior to the beginning of the educational activity.

4. Resolution of Personal Conflicts of Interest

- A. The provider must document that everyone who is in a position to control the content of an education activity has disclosed all relevant financial relationships with any commercial interest to the provider. “Relevant financial relationships” are defined as financial relationships in any amount occurring within the past 12 months that create a conflict of interest.
- B. An individual who refuses to disclose relevant financial relationships must be disqualified from being a planning committee member, a teacher, or an author, and cannot have control of, or responsibility for, the development, management or presentation or evaluation of a CME activity.
- C. The provider must have implemented a mechanism to identify and resolve all conflicts of interest prior to the education activity being delivered to learners.

5. Appropriate Use of Commercial Support

- A. The provider must make all decisions regarding the disposition and disbursement of commercial support
- B. A provider cannot be required by a commercial interest or its surrogate to accept advice or services concerning teachers, authors, or participants or other education matters, including content, from a commercial interest or its surrogate as conditions of contributing funds or services.
- C. All commercial support associated with a CME activity must be given with the full knowledge and approval of the provider.
- D. The terms, conditions, and purposes of the commercial support must be documented in a written agreement between the commercial supporter and the provider that includes its educational partner(s), if applicable. The agreement must include the provider (party responsible for activity execution) even if the activity has an educational partner or joint provider.
- E. The written agreement must specify the commercial interest that is the source of commercial support

- F. Both the commercial supporter and the provider must sign the written agreement between the commercial supporter and the provider.
- G. The provider must have written policies and procedures governing honoraria and reimbursement for out-of-pocket expenses for planners, faculty and authors.
- H. The provider, joint provider, or designated educational partner must directly pay any faculty or author honoraria or reimbursement for out-of-pocket expenses in compliance with their own written policies and procedures.
- I. No other payment shall be given to the director of the activity, planning committee members, teachers, faculty, or authors, joint provider, or any others involved with the supported activity.
- J. If teachers, faculty or authors are listed on the agenda as facilitating or conducting a presentation or session, but participate in the remainder of an educational event as a learner, their expenses can be reimbursed and honoraria can be paid for their teacher, faculty, or author role only.
- K. Social events or meals at CME activities cannot compete with or take precedence over educational events.
- L. The provider may not use commercial support to pay for travel, lodging, honoraria, or personal expenses for non-teacher, non-faculty or non-author participants of a CME activity. The provider may use commercial support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, joint provider or educational partner.
- M. The provider must maintain accurate documentation detailing the receipt and expenditure of the commercial support as well as all other funds.

6. Appropriate Management of Associated Commercial Promotion

- A. Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation, nor can they be a condition of the provision of commercial support for CME activities.
- B. Product promotion or product-specific advertisement of any type is prohibited in or during CME activities. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided.
 - Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements)
 - promotional activities must be kept separate from CME.

- For print, advertisements and promotional materials will not be interleaved within the pages of the CME content. Advertisements and promotional materials may face the first or last pages of printed CME content as long as these materials are not related to the CME content they face and are not paid for by the commercial supporters of the CME activity.
 - For computer based, advertisements and promotional materials will not be visible on the screen at the same time as the CME content and not interleaved between computer 'windows' or screens of the CME content. Also, providers may not place their CME activities on a Web site owned or controlled by a commercial interest. With clear notification that the learner is leaving the educational Web site, links from the Web site of a provider to pharmaceutical and device manufacturers' product Web sites are permitted before or after the educational content of a CME activity, but shall not be embedded in the educational content of a CME activity. Advertising of any type is prohibited within the educational content of CME activities on the Internet including, but not limited to, banner ads, subliminal ads, and pop-up window ads. For computer based CME activities, advertisements and promotional materials may not be visible on the screen at the same time as the CME content and not interleaved between computer windows or screens of the CME content.
 - For audio and video recording, advertisements and promotional materials will not be included within the CME.
 - There will be no 'commercial breaks.'
 - For live, face-to-face CME, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CME activity. Providers cannot allow representatives of Commercial Interests to engage in sales or promotional activities while in the space or place of the CME activity.
 - For Journal-based CME, None of the elements of journal-based CME can contain any advertising or product group messages of commercial interests. The learner must not encounter advertising within the pages of the article or within the pages of the related questions or evaluation materials.
- C. Educational materials that are part of a CME activity, such as slides, abstracts and handouts, may not contain any advertising, corporate logo, trade name or a product-group message of an ACCME-defined commercial interest.
- D. Print or electronic information distributed about the non-CME elements of a CME activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product-promotion materials or product-specific advertisement.
- E. A provider may not use a commercial interest 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.