POLICY FOR COMMERCIAL SUPPORT OF CONTINUING MEDICAL EDUCATION

The UNMC College of Medicine Center for Continuing Education recognizes the importance of continuing medical education as a major tool to improve the quality of patient care. The role and mission of the Center for Continuing Education is to promote lifelong learning to health care professionals while maintaining the:

- ACCME Essentials and Standards of the Accreditation Council for Continuing Medical Education
- ACCME Standards for Commercial Support of Continuing Medical Education
- American Medical Association’s Opinion of the AMA Council on Ethics and Judicial Affairs on Gifts to Physicians from Industry
- Association of American Medical Colleges Guidelines for Faculty Involvement in Commercially Supported Continuing Medical Education
- Guidelines of the Pharmaceutical Manufacturers Association (PhRMA)
- United States Food and Drug Administration’s Final Guidance on Industry-Supported Scientific and Education Activities

It is recognized that commercial entities (pharmaceutical companies, device manufacturers, etc) are a major source of funding for continuing medical education nationwide. However, this dependence on industry raises the potential for bias in educational content. This document is intended to define the appropriate relationships between the Center for Continuing Education, the faculty, program committees, and the commercial entities which provide financial support to continuing education activities.

- The Center for Continuing Education will be totally responsible for all decisions on key components of activity design, development of activity goals and objectives, specifics of content, promotional materials, faculty, activity evaluation, maintenance of registrant records and implementation for the educational activities.

- The UNMC/CCE is solely responsible for the administration, content, quality and integrity of all continuing education activities. Commercial entities may participate in programming discussions at the discretion of the Center for Continuing Education.

- Program Committees are established to determine what educational activities/content is needed; selection of presenters to ensure the highest degree of independence, balance, scientific rigor and objectivity.

- The CCE or Program Committee may offer registration at a reduced fee or waive charges for faculty, residents and students of the educational institution or cosponsoring agency.

- Activity faculty should provide balanced information in oral presentations, demonstrations, syllabi and other written materials. Program content should be presented with scientific objectivity. Presenters at CCE sponsored CME activities will not be permitted to promote commercial products, services, or devices.

- The CCE will require a Disclosure of Faculty Relationship Conflict of Interest Declaration from each presenter of a CCE sponsored educational activity. The form must be signed and dated by each presenter prior to the date of the presentation.

- All speakers, planning committee members, and other individuals associated with developing or implementing activities are required to disclose in writing any actual or potential conflicts of interest they may have relative to their role in the activities as well as any investigational or unlabeled use of a product. Having an interest or
affiliation with a commercial or non-commercial organization does not prevent a speaker from participating in an activity, but that relationship must be made known in advance to the activity participants. This requirement also applies to continuing medical education activities not funded by commercial companies. When an activity has no disclosures, UNMC/CCE is required to indicate to the audience that the speakers were asked for disclosures, but the speakers had nothing to disclose.

- Payment of reasonable honoraria and reimbursement for out-of-pocket expenses for faculty is permissible.

- Faculties who participate in commercially underwritten activities that are not accredited as continuing medical education are participating as representatives of the commercial entities. These individuals are governed by different FDA guidelines and must understand that they are representing the commercial entity and not the University of Nebraska College of Medicine.

- All commercial support associated with a CME activity must be given with the full knowledge and approval of the CCE. The terms, conditions and purposes of such grants must be documented by a signed agreement between the commercial entity and the CCE. This signed agreement will define the respective roles and responsibilities of the grantor and the CCE.

- An educational partner may be delegated the responsibility for receiving and disbursing funds provided a Letter of Agreement is signed between the commercial supporter and the UNMC/CCE and a full accounting of the funds can be documented by the UNMC/CCE.

- Acknowledgement of commercial support will be made in printed collaterals. Reference will not be made, however, to specific products.

- Commercial entities may be permitted to support events/receptions, exhibit, providing:
  - they abide by existing guidelines
  - they do not interfere with the presentation of a CME activity.
  - Exhibit placement will not be permitted as a condition of support for a CME activity.
  - Commercial materials will be permitted only in designated areas and at designated times.
  - All commercial promotion or displays must be clearly identified as such.

- At the discretion of the UNMC/CCE, commercial representatives may be allowed to publicize or distribute publicity for CME activities provided only UNMC/CCE materials are distributed. It is the intent of this guideline to assure that attendance at or exposure to marketing/advertising is at the discretion of the student.

- Commercial representatives may attend an educational activity, but may not engage in promotion of products while in the area where the program is taking place.

- Funding from a commercial source for a sponsored CME activity cannot be paid to the Program Director of the activity, faculty, or others involved with the activity without the specific knowledge and approval of the CCE.

- Commercial entities may not provide any benefits that may induce feelings of indebtedness by attendees which may potentially affect objective evaluation of the quality of the presentation.

- The commercial enterprise may not use funds to pay travel, lodging, registration fees, honoraria, or personal expenses for non-faculty attendees.

- Scholarship or other special funding to permit medical students, residents, or fellows to attend selected educational conferences may be provided as long as the selection is made either by the trainee's academic unit, or by the CCE with the full concurrence of the trainee's academic unit. Under no circumstances shall the commercial organization which provides the funding have control over the selection of scholarship recipients.

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