

CME POLICY AND PROCEDURE

COMMERCIAL SUPPORT

Policy

It is the policy of the Drexel University College of Medicine (DUCOM) to insure balance, independence, objectivity and scientific rigor in all its educational programs.

Procedure

Distribution of Commercial Support Policy

The Drexel University College of Medicine OCME policy on commercial support is to be circulated to all prospective Program Directors with the CME application form. The Program Director/Applicant is required to comply with the policy.

Planning and Presentations at an Accredited Program

All presenters at CME activities are required to:

- Complete the Disclosure of Relationships and Resolution Form prior to the activity.
- Disclose their relationship with any relevant commercial interest on the Disclosure Form.
- Identify how potential conflicts of interest will be resolved.
- Agree to have the relationships disclosed to the attendees of any meeting.
- Refrain from promoting commercial entities and their products.
- Ensure that the content is commercial free and evidence based.
- Reference drugs, preferably in generic terms, in the context of other available treatments.
- Disclose any off label, experimental or investigational use of drugs or devices discussed in the presentation.

All presentations will be:

- Objective, scientifically valid and evidence based.
- Research presentations and design will comply with accepted standards.
- Unlabeled and investigational use of products will be clearly identified.

Program Directors will insure that:

- The speakers' et al relationships (or lack of) are disclosed to the audience prior to the start of the activity.
- Potential conflicts of interest and method used to resolve potential conflicts are disclosed to the audience prior to the start of the activity.
- The names of companies providing commercial support are disclosed to the audience.
- Educational programs are designed and produced without undue influence from Commercial supporters.
- Speakers are selected without undue influence from commercial supporters.

Educational and marketing materials are produced without undue influence from a commercial interest. If the educational materials were produced for a commercially sponsored educational activity (i.e. speaker's bureau), this potential conflict of interest must be resolved and the relationship and method of resolution acknowledged to the audience.

Commercial Exhibitions

Commercial sponsors will abide by the following guidelines:

Placement of commercial exhibits and marketing materials in the same room as the educational activity is prohibited.

Commercial supporter sales activity at the educational site is prohibited.

Payment for Certificates/Meals

The sponsor may not pay for the physicians' registration fees or for the physician to attend meetings.

Commercial supporters cannot purchase food (breakfast, lunch, dinner, or refreshments) directly or make arrangements with the restaurant or caterer. Instead, the supporter must provide an educational grant to the University to be used toward the purchase of the food.

Scholarships for fellows, residents, and students selected by the Program Director are permissible.

Management of Funds

DUCOM management of funds from commercial sources will be handled according to ACCME guidelines. Financial support must be in the form of an educational grant and preceded by the Letter of Agreement (LOA). Drexel University College of Medicine must be identified as the Accredited Provider and the Agreement must be signed by the Assistant Dean for Continuing Medical Education. If the Letter of Agreement calls for the identify of the "joint" sponsor, our CME partner/collaborator may be identified as the joint sponsor or "Provider" of the activity:

The ultimate decision regarding funding arrangements for CME activities must be the responsibility of DUCOM. Funds from a commercial source should be in the form of an educational grant, payable to the OCME (or our designee) for the support of programming. The terms, conditions and purposes of the grant are outlined in the LOA and must be consistent with the ACCME requirements for a CME activity. All financial support must be pursued and awarded with the full knowledge and approval of DUCOM, the Accredited Provider. No other funds from a commercial source shall be paid to the director of the activity, faculty, or others involved with the support activity.

Payment of reasonable honoraria and reimbursement of out-of-pocket expenses must be in accordance with the DUCOM honorarium policy.

Commercial support must be acknowledged in printed announcements, brochures and handouts.

Following the CME activity the commercial supporter may require a report on the expenditure of funds.

Responsibility of the Program Director at the Completion of a Program or Symposium

At the end of each academic year (for regularly scheduled conferences) or upon the completion of a course/conference/symposium, documentation of compliance and a financial summary of revenues and expenses must be provided to OCME for the program files.

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