

Stanford University School of Medicine Policy on Commercial Support of Continuing Medical Education (CME)

GUIDING PRINCIPLE:

This policy is intended to insure that Stanford CME activities are fully compliant with both the Standards for Commercial Support of the Accreditation Council for Continuing Medical Education (ACCME) and the Stanford School of Medicine Industry Interactions Policy (SIIP). The goal is to insure Stanford CME is free from commercial influence, based upon the best scientific evidence available, and designed to change physician competence, performance-in-practice and/or patient outcomes.

SCOPE:

This policy encompasses all forms of physician education certified for CME by the Stanford School of Medicine, whether held on or off campus. This policy applies to all CME including conferences and symposia, regularly scheduled series (grand rounds, tumor boards, case conferences, M&Ms, journal clubs) and enduring materials (online, print, DVD, etc.). In this policy the term CME refers to activities certified for credit by the Stanford School of Medicine.

GUIDELINES FOR ACCEPTING COMMERCIAL SUPPORT:

What Constitutes Commercial Support?

A 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.

Commercial Funding for Specific CME Activities Is Not Permitted.

This includes both on campus and off site venues and all functions that propose to use the Stanford name. This also includes payments from third party sources or for-profit course organizers that have received industry support. Donations from individuals, foundations, and charitable organizations that are not commercial interests may be used for support of a specific CME activity.

Undesignated Commercial Support.

The School recognizes that industry may wish to provide support for CME that is not designated to a specific subject, course, speaker, or program but is intended for use in a broadly defined field of study. Support from industry for CME will be considered in the following general categories:

- Medical, pediatric and surgical specialties
- Diagnostic and imaging technologies and disciplines
- Health policy and disease prevention
- Other broadly defined topic areas

Commercial Support Funds Must Be Contributed to a Central Pool.

Industry support for CME activities must be directed to the Stanford Center for CME. The only commercial funds eligible for use in support of CME activities are those that have been specifically donated to the Stanford CME central pool.

Applying for Commercial Support.

Requests to commercial entities for support of a CME activity must be submitted by the Stanford Center for CME. Faculty should work together with the CME staff to prepare commercial support requests. Both the commercial entity and Stanford are required to sign Stanford's Letter of Agreement for Commercial Support (LOA) which specifies terms and conditions in compliance with the ACCME Standards for Commercial Support. This instrument must be endorsed by a responsible company official (who is authorized to make such commitments) and by the Associate Dean for Continuing Medical Education.

Requesting Allocation of Commercial Support from the Central Pool.

Allocations of commercial funds from the central pool are determined by the Associate Dean for CME upon recommendation from the CME Faculty Advisory Council. All proposals will be reviewed by the CME Faculty Advisory Council and decisions will be made based on identified practice gaps, quality indicators, strategic initiatives, innovative and novel learning techniques and/or targeted health outcomes. Commercial funds contributed in support of Stanford CME must be expended exclusively on Stanford CME activities.

Management of Commercially Derived Funds.

All commercial support for CME is managed by the Stanford Center for CME.

Educational Partners.

To avoid inconsistencies in policy, educational partners may not accept commercial support for CME activities planned with Stanford. All commercial support funds for activities in which Stanford participates must flow to the Stanford CME central pool.

Stanford CME controls all aspects of the management of funds from a commercial entity. Even in cases in which there is an educational partner, Stanford is a signatory to the Letter of Agreement and is full in control of all decisions and agreements relative to such funds.

Commercial Funds Contributed for Purposes Other Than CME May Not Be Used to Support CME.

No Additional Funds May Be Provided to Those in Positions to Influence Educational Content.

Stanford School of Medicine policy prohibits commercial supporters from providing funds other than to the central pool. For example, a commercial interest may not provide additional CME support funds to those in a position to control content of CME activities.

Disclosing Commercial Support to Learners.

Stanford Center for CME acknowledges the receipt of educational grants from commercial interests and makes this information known to learners prior to the execution of a CME activity. This information is provided through the publication of a general statement in activity syllabi or in handouts acknowledging all in-kind and monetary support grants received for all activities.

“In-kind” Support – A Special Consideration.

“In-kind” support refers to the loan or donation of equipment or supplies as well as services from a commercial entity. As this type of donation cannot be pooled and reallocated to other activities, in-kind support may be donated in support of a specific activity upon prior approval by the Associate Dean of CME via an executed Letter of Agreement for in-kind commercial support. No marketing activity may be associated with the use of in-kind support. When there are multiple products available, every effort must be made to ensure broad inclusion or use of possible equipment alternatives.

COMMERCIAL INVOLVEMENT IN STANFORD CME:

Exhibits by Commercial Interests Are Not Permitted Either On or Off Campus.

Commercial Employees as Instructors.

Under rare exceptions, a commercial employee who possesses unique expertise related to a device or equipment not available otherwise may be permitted to participate as instructor. This exception requires a compelling justification and prior approval by the Associate Dean of CME. Specific disclosures and appropriate monitoring by course leaders are required.

Commercial Employees as Technical Assistants.

As a general rule, commercial interests’ employees are not permitted to assist in CME. When a commercial employee is essential to operating a piece of equipment critical to the educational mission, upon prior approval by the Associate Dean of CME, this may be permitted with the proviso that no marketing activities may take place. Special disclosures and appropriate monitoring by course leaders are required.

Commercial Employees as Learners.

Commercial employees may attend CME activities for their own personal education. They must pay full tuition, wear a conference name badge, wear no commercial identifiers (e.g., corporate logos), and engage in no sales or promotional activity.

Commercial Marketing and Product Messaging Is Forbidden.

All Stanford medical education syllabi, brochures, course websites, lecture slides, etc. must be entirely free of commercial marketing or product messaging such as logos, slogans, etc.

Use of Brand Names:

Descriptive terminology rather than brand names for pharmaceuticals (i.e. generic chemical names) and medical technologies and devices should be employed. To avoid learner confusion, it is permissible to introduce a brand name in conjunction with its generic equivalent if this promotes learning.

Assuring Fairness and Balance:

When a commercial product is discussed every effort should be made to insure fairness and balance. A thorough discussion of the alternatives (e.g. other drugs or technologies) should be included.

Promotion of Stanford CME by Commercial Interests Is Not Permitted.

Stanford CME activities may not be marketed by commercial interests (e.g. on their websites, by their representatives) because it could be misunderstood to imply a relationship that does not exist.

Separation of Education from Promotion.

Stanford CME activities must not promote the interests of product manufacturers. The following safeguards monitor this separation:

- **ACTIVITIES LINKED TO ANALYSES OF LEARNER GAPS AND OTHER NEEDS**—CME activities are planned based on clear gaps in knowledge and/or performance, the expert opinions of recognized experts in the field, national guidelines or authorities' description of best practices. Particular emphasis is placed on quality improvement and innovative learning methods.
- **CONTENT VALIDATION PRACTICES**— Content planners and course faculty are required to attest that commercial bias is not present and that the educational material is scientifically accurate, based on evidence acceptable to the profession, and that treatments discussed are appropriate. Stanford has developed a standard form for this purpose, used in the planning stages for all activities.
- **RETROSPECTIVE LEARNER FEEDBACK**—Evaluation mechanisms contain questions that serve to demonstrate that learners did not perceive commercial bias in the materials from a specific teacher/author. If a bias is perceived, this information is provided to the planners, faculty and others so that an improvement plan can be determined and outcomes of the improvements monitored.

Provision of Funds to Learners.

Stanford CME does not provide funds to offset the costs of attending CME activities for its learners. Such honoraria and expense support is provided only to faculty associated with the activity.

ASSURING INDEPENDENCE OF CURRICULUM:

Stanford Develops CME Activities Independent of Any Commercial Interest.

Commercial interests are never allowed to be involved in the following:

- Identification of practice gaps and needs that become the foundation for the activity
- Preparation of or input into the learning objectives
- Selection and presentation of content
- Recommendation of persons to serve as faculty for the activity or any other persons that will be in the position to control the content of CME
- Influence over the selection of the educational design for the activity
- Selection of vendors or methods for the evaluation of the activity
- Requests for “technical review” of the content of the CME activity

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