

## FAQs for Continuing Medical Education (CME) Policies

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<h3>Guiding Principle</h3>
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This policy is intended to insure that the Stanford Center for Continuing Medical Education (SCCME) activities are free from commercial influence, based upon the best scientific evidence available, and designed to change physician competence, performance-in-practice and/or patient outcomes.

<h3>Commercial Support</h3>
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***How is commercial support defined?***

Commercial support is a financial or in-kind contribution given by a commercial interest and used to pay all or part of the costs of a continuing medical education (CME) activity. “In-kind” refers to the loan or donation of equipment and/or supplies from a commercial entity. The material provided must be a product of the donating company.

***What constitutes a commercial interest in relation to CME?***

A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.

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### ***What type of CME activity is covered under this policy?***

This policy applies to all CME activities certified under Stanford's accreditation from the Accreditation Council for Continuing Medical Education (ACCME). The term "CME" specifically indicates certified activities including all live courses, regularly scheduled series such as grand rounds, case conferences, M&Ms, tumor boards, journal clubs, live online activities, performance improvement activities, and enduring educational materials (e.g. online, print, DVD, etc.) for which **AMA PRA Category 1 Credit™** is awarded.

### ***What about non-certified CME activities?***

Guidelines for all non-CME certified educational activities at Stanford School of Medicine are incorporated in the [Stanford Industry Interactions Policy \(SIIP\)](http://med.stanford.edu/coi/siip/policy.html) (<http://med.stanford.edu/coi/siip/policy.html>).

### ***What is the policy on commercial support for Stanford CME?***

As of July 1, 2014, the SIIP has been modified to allow designated commercial support for a specific topic if the following conditions have been met:

- This support is limited to activities in areas previously designated by Stanford for curricular development;
- Activity planning is independent of commercial control;
- Review by the CME Strategic Advisory Committee (which consists of leadership at Stanford Health Care, Stanford Children's Health, and the School of Medicine) and the Stanford Center for Continuing Medical Education (SCCME) find the activity to be free of bias;
- Industry support is sought in collaboration with and under the auspices of the SCCME.

This includes activities held either on the Stanford campus or at offsite venues and all functions that propose to use the Stanford name.

### ***What activity types may receive financial commercial support?***

The following activity types may receive financial commercial support:

- Conferences and workshops
- Live online activities
- Enduring activities (e.g. online, DVD, print, etc.)
- Performance improvement activities
- Maintenance of Certification (MOC) activities

Regularly scheduled series (e.g. grand rounds, case conferences, tumor boards, etc.) may not receive financial commercial support.

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### ***What is the process for seeking financial commercial support?***

Seeking financial commercial support for Stanford certified CME activities is a multistep process involving the following:

1. Work with the appropriate Stanford Center for CME (SCCME) manager and Grants Staff member to discuss the commercial support seeking process and complete and submit an Internal Commercial Support Request for review and approval by the Strategic Advisory Committee (SAC) (see *What is the policy on commercial support for Stanford CME?* for more information). The SAC will assess if commercial bias is present and the activity's independence and fit within the missions of Stanford Medicine's entities. If approved, commercial support may be sought for the educational activity.
2. Review of approved Internal Commercial Support Requests by peer reviewers who are non-conflicted physicians. The SCCME will select reviewers from recommendations made by department chairs for non-conflicted physician reviewers or other sources. The peer-review will check to determine if commercial bias exists. If commercial bias is present, the Internal Commercial Support Request will be updated by the Course Director as needed to remove the bias.
3. The process used for seeking commercial support will depend on how much support is requested and the number of companies involved. As there are no standard national criteria, the SCCME and the Course Director will choose the process they think will result in the most successful outcome. Greater effort is required to obtain higher support amounts. The two processes that may be used are:
  - a. Through collaboration with a SCCME manager, the Course Director will develop the CME Application. Once the CME Application is approved, SCCME staff will develop the appropriate materials for submission as required by each company (e.g. request letter, copy of the brochure, etc.).
  - b. With guidance from a SCCME manager and the Grant Proposal and Award Generalist, the Course Director will develop an External Commercial Support Proposal ("Proposal") based on a template provided by the SCCME. Development of the Proposal will be under the guidance of the SCCME. A high level of partnership will be required to create a competitive proposal. This Proposal (and accompanying documents) will meet the needs of the commercial interests and serve as documentation of the activity for the ACCME. Completion of a CME Application will not be required. Once the Proposal is approved by SCCME, it will be ready for submission to companies
4. SCCME or its approved educational partner will submit commercial support documents to commercial interests identified by the Course Director and SCCME.
5. SCCME or its approved educational partner will manage all communication and negotiation with commercial interests related to the Commercial Support submissions.

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6. If a commercial entity agrees to fund a request for support, both the commercial entity and Stanford are required to sign a Letter of Agreement for Commercial Support (LOA) that specifies the commercial interest providing the commercial support and terms and conditions of that support that comply with the ACCME Standards for Commercial Support. This instrument must be approved and signed by a responsible company official (who is authorized to make such commitments) and by the Associate Dean for Postgraduate Medical Education or the Director of CME. Stanford has developed a standard form for this purpose.

### ***Who requests commercial support from companies?***

Requests for commercial support for certified CME must be submitted to potential commercial supporters by the Stanford Center for CME (SCCME) or by an SCCME approved educational partner. Course Directors should work with the CME staff to prepare commercial support funding requests. Depending on the amount of support sought, different procedures will be followed. Larger amounts of support require more extensive request documentation. Please contact the CME office to discuss your support needs so a determination can be made about how to proceed in seeking support.

The policy covering criteria for requests for commercial support of non-certified educational activities is described in the [SIIP policy](http://med.stanford.edu/coi/siip/policy.html) (<http://med.stanford.edu/coi/siip/policy.html>).

### ***Who can sign letters of agreement for commercial support at Stanford?***

All agreements for commercial support of certified CME must be executed by the Associate Dean for Postgraduate Medical Education or designees.

### ***What is “in-kind” support?***

“In-kind” refers to the loan or donation of equipment and/or supplies from a commercial entity. The material provided must be a product of the donating company.

### ***Can a certified CME activity receive “in-kind” support?***

Once a course has been approved by the Stanford Center for CME (SCCME), certain types of in-kind support may be permitted, upon prior approval by the Associate Dean of Postgraduate Medical Education, so long as no marketing activity is associated with their use. When multiple products are available, every effort must be made to ensure broad inclusion of equipment from competing commercial interests.

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### ***Can commercial funds designated for CME later be used for other purposes?***

Commercial funds contributed in support of a Stanford CME activity will be expended on the designated Stanford CME activity. Once the contractual agreements from the commercial entities are met, if any funds remain available, these monies can be used for the development and implementation of additional educational activities in the following order: 1) CME activities within the same academic or hospital department/center for that fiscal year; 2) transferred to the CME PTA for a future CME course upon approval by the Stanford Center for CME Director; and 3) educational activities provided by the Course Director's academic or hospital department/center for practicing health professionals, trainees, medical students or patients upon approval from the Associate Dean for Postgraduate Medical Education.

### ***Can unrestricted commercial donations to departments (or other school entities) be used to support a certified CME activity?***

No, unrestricted commercial donations to departments (or other school entities) cannot be used to fund CME activities.

### ***What types of support are permitted for specific CME activities?***

Donations from individuals, foundations, and charitable organizations that have no commercial bias may be designated for support of a specific CME activity. Commercial support is permitted if the following conditions have been met:

- This support is limited to activities in areas previously designated by Stanford for curricular development;
- Activity planning is independent of commercial control;
- Review by the CME Strategic Advisory Committee (which consists of leadership at Stanford Health Care, Stanford Children's Health, and the School of Medicine) and the Stanford Center for Continuing Medical Education (SCCME) find the activity to be free of bias;
- Industry support is sought in collaboration with and under the auspices of the SCCME.

### ***How can we acknowledge and disclose commercial support?***

Appropriate wording for any commercial support (financial or in-kind) received for a specific CME activity will be provided by the CME office. The acknowledgement cannot contain the use of trade names, product group messages, or commercial interests' logos. Acknowledgements can be made in the activity syllabus, opening slides and remarks, and marketing materials (if received early enough to do so). Disclosure must always be made in advance of the activity.

## Commercial Exhibits and Advertisements

### ***Are commercial exhibits and advertisements allowed?***

Exhibits or advertisements by commercial organizations are not permitted at CME activities whether at Stanford or at offsite locations. The only exceptions are medical book vendors and non-profit organizations unrelated to commercial interests (such as societies and associations).

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### Commercial Interaction Relating to CME Activities

#### ***Can commercial employees plan or instruct in CME activities?***

Commercial employees may not participate in the planning of CME activities. Commercial employees may serve as an instructor in Stanford CME activities only under narrowly defined circumstances. An employee of a commercial entity may present on: the scientific or discovery process itself, the results of basic (biologic, chemical, physical) research studies relevant to the clinical problem being addressed but not those specific to a commercial product or its clinical testing, and CME topics other than those related to the products and business lines of his/her employer. Commercial employees may neither teach about their products nor offer recommendations regarding patient care. Permission for a commercial employee to act as instructor in a Stanford CME activity must be obtained in advance from the Associate Dean for Postgraduate Medical Education and the employees' participation must be closely monitored by course leadership.

#### ***Can commercial employees serve as technical assistants in Stanford certified CME courses?***

As a general rule, commercial employees are not permitted to assist in CME. Exception may be made if the commercial employee is needed for technical assistance essential to operating a piece of equipment in a demonstration critical to the educational mission of the activity. In such a circumstance, an employee may demonstrate use of the product, but may not discuss the indications for use of the product or its merit relative to competing products. This participation of a commercial employee must be approved in advance by the Associate Dean of Postgraduate Medical Education. Commercial employees who provide technical assistance are required to sign Stanford's attestation/disclosure form. It is the responsibility of course leadership to appropriately monitor the employee's participation in the CME activity for compliance with these guidelines.

#### ***Can commercial employees attend Stanford CME courses?***

If the activity has received financial commercial support, one or two members of the supporter's continuing education/independent education team will be allowed to attend to observe how the company's commercial support was expended. The names of these individuals must be provided in advance to the Stanford Center for CME. In all other circumstances commercial employees may attend, but only for their own education and they must pay full tuition. All commercial employees who attend Stanford CME courses must wear a conference name badge, wear no commercial identifiers (e.g. corporate logos), and engage in no sales or promotional activity.

#### ***Can company logos and slogans be used?***

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

#### ***Can brand names be used during CME activities?***

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.

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### ***Can Stanford CME activities be marketed by commercial employees or on company websites?***

No. This is not permitted because it could be misunderstood to imply a relationship that does not exist.

### ***Can meals and social events occur at CME activities?***

Modest meals and social events may accompany a CME activity but may only be paid for through tuition, funds supplied by a School of Medicine or hospital department, or other non-commercial interest. Commercial employees may only attend as either representatives of a supporter's continuing education/independent education team or as individual paid registrants in the course (see above). Meals and social events may not be longer, more important or more costly than the educational activity.

## Administration of CME

### ***Are departments allowed to independently coordinate and manage certified CME courses?***

No, all certified CME activity is managed through either the Stanford Center for CME or the Lucile Packard Children's Hospital's CME office.

### ***When can the Stanford name be used in relation to a CME activity?***

Only CME activities that have been certified or administered by the Stanford Center for CME (SCCME) and are fully compliant with SOM commercial support policies may use the Stanford name.

### ***Can another accredited entity sponsor a Stanford CME activity?***

No. All CME activities sponsored by Stanford must use Stanford SOM as their accredited provider.

### ***Can Stanford CME activities be jointly provided?***

Stanford supports collaborative development of CME activities with other organizations. It will work closely with non-ACCME accredited entities to develop and offer jointly provided activities (as defined by the ACCME), on a case by case basis. In these cases, commercial exhibits and advertisements are prohibited, regardless of which institution certifies the activity.

Co-providership with organizations that are ACCME accredited providers will also be considered. Proposals shall be discussed with the Associate Dean for Postgraduate Medical Education. Either institution may be the accrediting provider and control the process for commercial support as long as the CME activity is found to be free of commercial bias as determined by a non-conflicted peer reviewer or the School of Medicine's Conflict of Interest Review Program (see the FAQ "What is the process for seeking financial commercial support").

Potential collaborations must be based on a willingness to fully comply with Stanford policies.

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### ***How will decisions be made in terms of an activity's curriculum?***

CME Applications for activities must be submitted to the Stanford Center for CME (SCCME) by a Stanford faculty member. All Applications will be reviewed by a combination of CME staff which may include the Course Coordinator, the CME Conference Manager, the Online Manager, the Associate Director, the Director and the Associate Dean. Decisions will be made based on identified practice gaps, quality indicators, strategic initiatives, innovative and novel learning techniques and/or targeted health outcomes.

### ***Who may serve as a Course Director?***

For reasons of financial accountability and adherence to Stanford policies, the Primary Course Director should be at least a half-time Stanford School of Medicine physician faculty member. Community practitioners with voluntary clinical appointments, non-physicians and community health partners may participate as a Co-Course Director in concert with a Primary Course Director.

It is expected that the Primary Course Director familiarize him/herself with Stanford CME policies including: Commercial Support, Honoraria, and Identification and Resolution of Conflicts of Interest. The CME staff and Associate Dean are available to answer any questions regarding these policies, which are found at <https://med.stanford.edu/cme/planning-services/policies.html>.

## Disclosing and Resolving Conflicts of Interests

### ***What financial relationships need to be disclosed?***

Financial relationships relevant to the specific CME content must be disclosed. These relationships include those of the individual and his or her spouse or partner that have occurred within the last 12 months, and are of any financial benefit (no minimum dollar amount).

### ***How should contracted research grants from commercial entities be disclosed?***

All relevant contracted research with commercial interests must be disclosed by faculty in control of CME content. Contracted research includes research funding where the institution receives the grant and manages the funds and the person who must disclose is the principal or a named investigator on the grant.

### ***Who needs to disclose financial relationships?***

The CME faculty and anyone else with influence over the CME content must disclose. This includes course planners (both faculty and staff), moderators, reviewers or others who have control or influence over content.

### ***When do individuals involved in CME activities need to disclose relevant financial relationships?***

Financial relationship disclosures for the CME planners must be transmitted to the Stanford Center for CME at the beginning of the planning process. Disclosures from all other CME activity faculty must be submitted at least 30 days before the course.

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### ***When should reportable conflicts of interest be disclosed for the activity?***

Relevant financial relationships of faculty and planners must be disclosed to the learners **prior** to the activity. If the activity is online, the disclosure information must be provided before the learner enters the CME content.

### ***What is meant by resolving a conflict of interest?***

The ACCME requires that relevant conflicts be formally evaluated and resolved by a non-conflicted physician Course Director or a non-conflicted physician designee prior to the commencement of the activity. This will include review of activity material to ensure that: 1) educational content is fair, balanced, and free of commercial bias toward any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients, and 2) patient treatment recommendations are supported with the best available evidence and generally accepted by the scientific community. Any content issues identified by the reviewer must be revised appropriately in order for the conflict to be resolved.

### ***What is course leadership responsibility if a member of the faculty is perceived to present commercially biased material?***

If during an educational activity, course leadership detects commercial bias, it is their responsibility to discuss this with the learners in order to ensure that a fair and balanced program is in place.

## Promotion of CME Activities

### ***In promoting CME activities, what venue information can be included (e.g. hotel, resort, conference center)?***

Promotional materials may include the name, location, website address and minimal destination imagery (e.g. a small image of palm trees, the Golden Gate Bridge, or the venue). Use of Stanford imagery in CME promotion is encouraged.

### ***Can marketing for CME activities contain tourist information?***

No, Stanford CME marketing must focus exclusively on educational content. As such, promotional material may not include images of recreational activities (e.g. surfing, skiing) and only minimal images of a non-Stanford venue. Images included in promotional material should be related to the course content.

### ***Can we begin to promote our planned CME activities (e.g. brochures, websites) whenever we want to?***

With the exception of a “save the date” notice which may include only the activity name, date and location with no reference to CME credit, no promotion may occur until the course application has been approved for credit.

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### ***Can faculty participate in the design and distribution of promotional material?***

Yes, faculty involvement in the promotional process is encouraged. However, before distribution, all promotional materials (e.g. brochures, emails, websites, etc.) must be approved by the Stanford Center for CME.

## Honoraria for CME Activities

### ***What are the CME rules concerning honoraria for non-Stanford faculty?***

Invited faculty may receive an honorarium in addition to covering all of their customary travel expenses (in accordance with Stanford guidelines). An honorarium of up to \$1,000 per CME teaching day may be awarded up to a maximum of \$2,000 per CME activity.

### ***What are the CME rules concerning honoraria for Stanford faculty?***

An honorarium is supplemental personal compensation. Stanford employees may be paid honoraria for participating in Stanford CME activities. Granting of an honorarium must be approved by the recipient's department and by Educational Programs and Services (EPS). Honoraria greater than \$1,000 for CME activities are appropriate only for exceptional effort or in exceptional circumstances. Such honoraria must first be approved by the Associate Dean for Postgraduate Medical Education. For those employees who are Stanford faculty members, their academic enrichment accounts may be used to receive this compensation. Discretionary expenditures from these accounts must follow University rules.

Payment of honoraria or supplements to academic enrichment accounts to Stanford faculty is contingent upon adequate funds being available after all course expenses have been met.

Expenses related to participation in a CME activity (e.g. out-of-pocket travel, meals, and lodging) will be reimbursed. All pertinent rules and regulations set by Stanford University apply (such as per diem limits and mileage reimbursement rates). For details, see [Administrative Guide Memo 5.4.2 on Travel Expenses and the Stanford Controller's Office information on Travel Expense Reimbursement](#).

### ***Can CME revenue support a Stanford faculty member's salary?***

Revenues derived from CME activities may be used to reimburse a faculty member's department for time spent on CME only under exceptional circumstances. To be eligible, a sizable fraction of the faculty member's teaching effort must be committed to CME. Departmental reimbursement for fractions of a Stanford faculty member's salary must be approved by the Associate Dean for Postgraduate Medical Education and can only be paid after all other course expenses have been met.

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### Where Should I Direct My Questions?

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