

Commercial Support of Continuing Medical Education Policy

GUIDING PRINCIPLE

This policy is intended to ensure that Stanford continuing medical education (CME) activities are fully compliant with both the Accreditation Council for Continuing Medical Education (ACCME) Standards for Commercial Support and the Stanford School of Medicine Industry Interactions Policy (SIIP). The goal is to ensure 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 education certified for CME by the Stanford School of Medicine or other certified medical professional continuing education developed by Stanford through the Stanford Center for Continuing Medical Education (SCCME), whether held on or off campus. This policy applies to all SCCME developed continuing education including live courses, regularly scheduled series (grand rounds, tumor boards, case conferences, M&Ms, journal clubs), live online activities, performance improvement activities, and enduring materials (online, print, DVD, etc.). In this policy the term CME refers to activities certified by the Stanford School of Medicine for which *AMA PRA Category 1 Credit™* is designated or to activities certified by externally accredited organizations for which other forms of credit for professional health care providers is designated.

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 that are used to pay all or part of the costs of an educational activity. "In-kind" refers to the loan or donation of equipment and/or supplies from a commercial entity.

Commercial Funding for Specific CME Activities Is Permitted if the Activities Have Been Pre-Approved by the Strategic Advisory Committee (SAC).

This includes activities either on campus or at off-site venues and all functions that propose to use the Stanford name. Donations from companies which do not meet the definition of a commercial interest, individuals, foundations, and/or charitable organizations that are not commercial interests may be used for support of a specific CME activity and do not need preapproval by the SAC.

Commercial Support Guidelines.

Support from industry for CME may be accepted only by the SCCME. Support will be accepted only for activities in areas that have been designated by Stanford for curricular development. These areas will be identified and proposed to the SCCME on a regular basis. The SCCME conducts a two level review and approval process to ascertain that the activities have been independently developed without influence

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from commercial entities, focus on identified practice gaps, and are congruent with Stanford Medicine's identified needs and mission. Industry funding can be accepted only in these pre-determined areas of curricular enhancement. Acceptance of industry support must not influence curriculum in any way. Stanford and any SCCME identified educational partners must lead the identification of needs, determination of educational objectives, selection and presentation of content, selection of all persons and organizations that control the content, selection of educational methods, and evaluation. Commercial support may not be accepted for Regularly Scheduled Series (RSS).

Commercial Support Funding for Food and Beverages is Prohibited.

All food and beverages served at CME activities must be paid for through tuition, funds supplied by a School of Medicine or hospital department, or other non-commercial interest.

Commercial Support Funds May Be Contributed to the Stanford Center for Continuing Medical Education.

All industry support for CME activities must be directed to the Stanford Center for CME. Commercial funds eligible for use in support of CME activities can be given either to the SCCME in support of a specific activity (except for RSS) or in support of the overall CME Program.

Applying for Commercial Support.

On a regular basis, Course Directors can submit to the SCCME requests for permission to seek commercial support, Internal Commercial Support Requests ("Requests"). These Requests will be assessed by the Strategic Advisory Committee (SAC) (see Appendix A) to verify the Request's independence and fit within the missions of Stanford Medicine's entities. If approved, the activity will be designated appropriate for curricular development and commercial support may be sought for it.

After SAC approval, the SCCME will submit the Request to either a non-conflicted physician reviewer or to the School of Medicine's Conflict of Interest Review Program. The review will check to ensure that no commercial bias exists. If commercial bias is present, the Request will be modified by the Course Director as needed to remove the bias. Simultaneously to the commercial bias review, Course Directors can begin the process of seeking financial support by either developing an External Commercial Support Proposal ("Proposal") or SCCME's CME Application. To determine which document to develop refer to the Commercial Support Process for Certified CME Activities <<https://med.stanford.edu/cme/planning-services/commercial-support.html>> procedure document.

If a commercial entity agrees to provide funding for an activity, 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 (see Appendix B).

Management of Commercially Derived Funds.

All commercial support for CME certified by Stanford must be given with the full knowledge and approval of and be managed by the Stanford Center for CME.

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Educational Partners.

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 CME providers will also be considered. Proposals should 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 an independent (defined as an individual not associated with the activity) non-conflicted physician reviewer or the School of Medicine's Conflict of Interest Review Program.

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

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

To ensure compliance with ACCME and Stanford Industry Interaction Policy requirements, commercial funds contributed for initial uses other than CME (such as unrestricted commercial donations to departments or other Stanford Medicine entities) may not be used to support Stanford CME activities.

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 for CME other than through the SCCME office. 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 support from commercial interests and makes this information known to learners prior to the beginning of the CME activity. This information is provided through the publication of a disclosure to learners in activity syllabi, handouts, or online, acknowledging all in-kind and monetary support received for CME activities. When in-kind support is received, the nature of the support is detailed in the disclosure. The disclosure may not contain the use of trade names, product group messages, or commercial interests' logos.

"In-kind" Support – A Special Consideration.

"In-kind" support refers to the loan and/or donation of equipment or supplies from a commercial entity. In-kind support may be donated for use in a specific activity upon prior approval by the Associate Dean of Postgraduate Medical Education or the Director 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 multiple products are available, conscientious effort must be made to attract support from multiple vendors of similar and substitutive equipment and supplies. Stanford has developed a standard LOA for this purpose (see Appendix C).

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Commercial Funds Contributed for CME May Only Be Used for CME and other Approved Educational Programs.

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.

COMMERCIAL INVOLVEMENT IN STANFORD CME:

Commercial Exhibits and Advertisements.

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).

Commercial Employees and their Spouses/Partners as Instructors and Planners.

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 processes/methodologies of research), 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.

The spouse or partner of an employee of a commercial interest is considered by the ACCME as a commercial employee. Consequently, the spouse/partner of the employee may not plan activities related to the products and/or services of their spouse's/partner's employer and is bound by the restrictions related to instruction outlined above.

Commercial Employees as Technical Assistants.

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.

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It is the responsibility of course leadership to appropriately monitor the employee's participation in the CME activity for compliance with these guidelines.

Commercial Employees as Learners.

Commercial employees may attend CME activities for their own 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 Employees as Commercial Funder Representatives.

If an activity receives financial commercial support, one or two members of the funder's continuing education/independent education team will be allowed to attend the activity to observe how the company's commercial support was expended. The names of these individuals must be provided in advance to the SCCME. As attendees, these commercial employees will 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 and product messaging such as logos, slogans, etc.

Use of Brand Names.

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

Assuring Fairness and Balance.

When a commercial product and/or device is discussed, every effort must be made to ensure fairness and balance. A thorough discussion of the alternatives (e.g. other treatments, 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) lest this suggest 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 EDUCATIONAL NEEDS**
CME activities are planned based on the identified professional practice gaps of the learners and the educational needs arising from those gaps.
- **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

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developed a standard form for this purpose, used in the planning stages for all activities (see Appendix D).

- **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 course director(s), planners, faculty and others so that an improvement plan can be initiated 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 (i.e. travel, lodging, personal expenses) for its learners. Honoraria and expense support are provided only to the faculty of 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

APPENDIX A

Strategic Advisory Committee Membership

- Associate Dean of Postgraduate Medical Education
- Associate Dean for Educational Programs and Services
- Director of CME
- 2 or more faculty representatives from each hospital
- 1 business representative from each hospital

APPENDIX B

LETTER OF AGREEMENT FOR COMMERCIAL SUPPORT Use for Financial Contributions to Certified CME

This Letter of Agreement, entered into this _____ day of _____, 20____, by and among the Board of Trustees of the Leland Stanford Junior University on behalf of its School of Medicine and the Commercial Interest named below, witnesses the following:

Definitions:

- **Commercial Interest:** Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.
- **Monetary Commercial Support:** A financial contribution given by a Commercial Interest which is used to pay all or part of the costs of a Continuing Medical Education activity.

Stanford University through its School of Medicine (the "Accredited Provider") is committed to presenting continuing medical education ("CME") activities that promote improvements or quality in healthcare and are independent of any Commercial Interest. As part of this commitment, the Accredited Provider has outlined in this written letter of agreement the terms, conditions, and purposes of Commercial Support for CME activities.

Title of CME Activity: _____

Activity Location(s): _____

Activity Date(s): _____

Name of Commercial Interest: _____

Amount of Commercial Support: \$ _____

Terms, Conditions, and Purposes

1. The Commercial Interest and the Accredited Provider agree to abide by all applicable requirements of the Accreditation Council for Continuing Medical Education (ACCME) *Standards for Commercial Support of Continuing Medical Education* (www.accme.org) as well as those of the Stanford University School of Medicine Commercial Support of Continuing Medical Education Policy (<https://med.stanford.edu/cme/planning-services/policies.html>) and the Stanford Industry Interactions Policy (<http://med.stanford.edu/coi/siip/policy.html>).
2. This activity is for scientific and educational purposes only and will not promote any specific proprietary business interest of the Commercial Interest.
3. The Accredited Provider is responsible for all decisions regarding the identification of educational needs, determination of learning objectives, selection and presentation of content, selection of all persons and organizations that will be in a position to control the content of the CME, selection of education methods, selection of target audience, selection of evaluation methods and marketing.
4. The Accredited Provider shall have as an educational partner in this activity [INSERT PROVIDER NAME].
5. The Accredited Provider and the Commercial Interest agree that the Commercial Support provided has not been determined in a manner which takes into account the volume or value of any referrals, financial relationship(s) or other business arrangement(s) otherwise existing between the parties for which payment may be made, in whole or in part, under any Federal or state health care program, including, without limitation, Medicare or Medicaid.
6. The Commercial Interest shall provide Commercial Support in the amount set forth above to the Accredited Provider promptly upon execution of this Agreement. The Accredited Provider will make all decisions regarding the disposition and disbursement of those funds.
7. The Commercial Interest will not require the Accredited Provider to accept advice or services concerning teachers, authors, or participants or other education matters, including content, as conditions of receiving this grant.
8. All commercial support associated with CME activities will be given with the full knowledge and approval of the Accredited Provider. No other payments shall be given to activity directors, planning committee members, teachers or authors, educational partners, or any others involved with a supported activity and in a position to control content relative to the specific CME activity.
9. Use of Monetary Commercial Support to pay for the purchase of food and beverages is prohibited.
10. Commercial exhibits are not permitted at Stanford CME activities.

11. **Product-promotion material or product-specific advertisement of any type is prohibited** in association with any Stanford CME activity. The juxtaposition of editorial and advertising material on the same products or subjects is not allowed. Promotional materials cannot be displayed or distributed in the education space immediately before, during, or after the CME activity. In addition, Commercial Interest shall have no role in the marketing of CME to learners and shall not advertise or market Stanford CME activities, including on Commercial Interest's websites.
12. One to two members of the **Commercial Interest's** continuing education/independent medical education team will be allowed to attend the CME activity without paying tuition to observe how the commercial support provided was expended. All other commercial employees may attend only as tuition paying learners, or if approved in advance by the **Accredited Provider**, as technical assistants to operate a piece of equipment critical to the educational mission. These employees must wear a conference name badge, wear no commercial identifiers (e.g. corporate logos), and engage in no sales or promotional activities while in the space or place of the CME activity.
13. The **Commercial Interest** may not be the agent providing the CME activity to the learners.
14. The **Accredited Provider** will ensure that the source of support from the **Commercial Interest** is disclosed to the learners in all CME activities supported by the commercial funds prior to the start of the activity. This disclosure will not include the use of a trade name or a product-group message. The acknowledgment of commercial support will state the name of the company or institution and will not include corporate logos and slogans.
15. The **Accredited Provider** will, upon request, furnish the **Commercial Interest** with documentation detailing the receipt and expenditure of the Commercial Support. The **Accredited Provider** agrees that the **Commercial Support** will be used only for the support of the identified CME activity or activities.

This **Agreement** constitutes the entire agreement between the parties relating to the **Commercial Support referenced above** and supersedes all other agreements, express or implied, between the parties as to its subject matter. This **Agreement** may be modified only by an amendment to this **Agreement** signed by both parties. This **Agreement** shall be governed by and construed in accordance with the laws of the State of California.

Accredited Provider: The Board of Trustees of the Leland Stanford Junior University on behalf of its
School of Medicine

Tax ID Number _____

Contact Person _____

Email Address _____

Phone Number _____

Fax Number _____

Commercial Interest: _____

Address _____

City, State, Zip _____

Contact Person _____

Email Address _____

Phone Number _____

Fax Number _____

Agreed by Authorized Representatives

Commercial Interest

By signing this agreement I am verifying that I am duly authorized to sign binding agreements on behalf of Commercial Interest.

Signature _____

Date _____

Print Name _____

Title _____

Accredited Provider

Course Director

Signature _____

Date _____

Griffith R. Harsh, MD
Associate Dean for Postgraduate Medical Education
Stanford University School of Medicine

Signature _____

Date _____

Print Name _____

APPENDIX C

LETTER OF AGREEMENT FOR COMMERCIAL SUPPORT

Use for "In-Kind" (Equipment/Supplies) Contributions to Certified CME

This Letter of Agreement, entered into this _____ day of _____, 20____ by and among the Board of Trustees of the Leland Stanford Junior University on behalf of its School of Medicine and the Commercial Interest named below, witnesses the following:

Definitions:

- **Commercial Interest:** Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.
- **Non-monetary Commercial Support:** "In-kind" support refers to the loan or donation of equipment or supplies from a commercial entity. The material provided must be a product of the donating company.

Stanford University through its School of Medicine (the "Accredited Provider") is committed to presenting continuing medical education ("CME") activities that promote improvements or quality in healthcare and are independent of any Commercial Interest. As part of this commitment, the Accredited Provider has outlined in this written letter of agreement the terms, conditions, and purposes of Commercial Support for the CME activity delineated below.

Title of CME Activity: _____	
Activity Location: _____	
Activity Date(s): _____	
Name of Commercial Interest: _____	
Description of In-Kind Support:	<input type="checkbox"/> Durable equipment <input type="checkbox"/> Disposable supplies (Non-biological) <input type="checkbox"/> Animal parts or tissue <input type="checkbox"/> Human parts or tissue <input type="checkbox"/> Other – description required _____

Terms, Conditions and Purposes

1. The Commercial Interest and the Accredited Provider agree to abide by all requirements of the Accreditation Council for Continuing Medical Education (ACCME) *Standards for Commercial Support of Continuing Medical Education* (www.accme.org) as well as the Stanford University School of Medicine Commercial Support of Continuing Medical Education Policy (<https://med.stanford.edu/cme/planning-services/policies.html>) and the Stanford Industry Interactions Policy (<http://med.stanford.edu/coi/siip/policy.html>).
2. This activity is for scientific and educational purposes only and will not promote any specific proprietary business interest of the Commercial Interest.
3. The Accredited Provider is responsible for all decisions regarding the identification of educational needs, determination of learning objectives, selection and presentation of content, selection of all persons and organizations that will be in a position to control the content of the CME, selection of education methods, selection of target audience, evaluation of the activity, and marketing of the activity.
4. The Accredited Provider shall have as an educational partner in this activity [INSERT PROVIDER NAME].
5. The Accredited Provider and the Commercial Interest agree that the Commercial Support provided herein has not been determined in a manner which takes into account the volume or value of any referrals, financial relationship(s) or other business arrangement(s) otherwise existing between the parties for which payment may be made, in whole or in part, under any Federal or state health care program, including, without limitation, Medicare or Medicaid.
6. The Commercial Interest will not require the Accredited Provider to accept advice or services concerning teachers, authors, or participants or other education matters, including content, as conditions of receiving this grant.
7. All commercial support associated with this activity will be given with the full knowledge and approval of the Accredited Provider. No other payments shall be given to the director of the activity, planning committee members, teachers or authors, educational partner, or any others involved with the supported activity and in a position to control content relative to the specific CME activity.
8. Commercial Exhibits are not permitted at Stanford CME activities.

9. **Product-promotion material or product-specific advertisement of any type is prohibited** in association with the CME activity. The juxtaposition of editorial and advertising material on the same products or subjects is not allowed. Promotional materials cannot be displayed or distributed in the education space immediately before, during, or after the CME activity. In addition, Commercial Interest shall have no role in the marketing of CME to learners and shall not advertise or market Stanford CME activities, including on Commercial Interest's websites.
10. Employees of **Commercial Interest** may provide essential technical support to faculty for the effective use of the "in-kind" support (e.g. equipment or supplies) only and may not engage in sales or promotional activities while in the space or place of the CME activity.
11. The **Commercial Interest** may not be the agent providing the CME activity to the learners.
12. The **Accredited Provider** will ensure that the source of "in-kind" support from the **Commercial Interest** is disclosed to the learners prior to the start of the activity. This disclosure will not include the use of a trade name or a product-group message. The acknowledgment of commercial support will state the name of the company or institution and will not include corporate logos and slogans.
13. The **Accredited Provider** will, upon request, furnish the **Commercial Interest** with documentation detailing the receipt and use of the "in-kind" Commercial Support. The **Accredited Provider** agrees that the "in-kind" **Commercial Support** will be used only for the support of the defined CME Activity or Activities.

This Agreement constitutes the entire agreement between the parties relating to the **Supported Activity** and supersedes all other agreements, express or implied, between the parties as to its subject matter. This Agreement may be modified only by an amendment to this Agreement signed by both parties. This Agreement shall be governed by and construed in accordance with the laws of the State of California.

Accredited Provider: The Board of Trustees of the Leland Stanford Junior University on behalf of its
School of Medicine

Tax ID Number _____
 Contact Person _____ Email Address _____
 Phone Number _____ Fax Number _____

Commercial Interest: _____
 Address _____
 City, State, Zip _____
 Contact Person _____ Email Address _____
 Phone Number _____ Fax Number _____

Agreed by Authorized Representatives

Commercial Interest

By signing this agreement I am verifying that I am duly authorized to sign binding agreements on behalf of Commercial Interest.

Signature _____ Date _____
 Print Name _____
 Title _____

Accredited Provider

Course Director

Signature _____ Date _____
 Griffith R. Harsh, MD
 Associate Dean for Postgraduate Medical Education
 Stanford University School of Medicine

Signature _____ Date _____
 Print Name _____

APPENDIX D
GUIDANCE REGARDING
DISCLOSURE FOR CME ACTIVITIES
Course Director/Planner/Reviewer

Today's Date:
Name of Course Director/Coordinator:
CME Activity Title and Date:

Dear

The Stanford University School of Medicine is accredited by the Accreditation Council for Continuing Medical Education (ACCME®). Stanford Center for CME expects that every CME activity certified for credit will be in full compliance with the ACCME® Criteria, Policies, and Standards for Commercial Support of Continuing Medical Education (<http://www.accme.org/>)

Stanford Center for CME has implemented a mechanism to identify and resolve any relevant conflicts of interest for all individuals in a position to control the content of an educational activity. This process must be completed prior to the commencement of the activity. Disclosure to learners must also be provided prior to the commencement of the activity. This includes the course director(s), planners, speakers, authors, panel members, moderators, content validation reviewer(s), etc. If an individual refuses to disclose relevant financial relationships to SCCME, s/he will be disqualified from participating in the CME activity.

As faculty selected to participate in this CME activity, we ask that you review the definitions below and complete the Disclosure and Attestation Forms that follow this cover sheet.

If you have any questions, please do not hesitate to contact us at the telephone number below.

Thank you.

ACCME Definitions

Conflict of Interest: Circumstances create a conflict of interest when an individual has an opportunity to affect CME content about products or services of a commercial interest with which he/she has a financial relationship. The ACCME considers financial relationships to create actual conflicts of interest in CME when individuals have both a financial relationship with a commercial interest and the opportunity to affect the content of CME about the products or services of that commercial interest.

Commercial Interest: Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients with the exemption of non-profit or government organizations and non-health care related companies. The ACCME does not consider providers of clinical services directly to patients to be commercial interests (e.g., liability/health insurance providers, group medical practices, hospitals, nursing homes, rehabilitation centers).

Financial Relationships: Those relationships you currently have or had during the last 12 months in which you benefit by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research which also includes funding where the institution gets the grants and manages the funds and you are the principal or named investigator for the grant), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected. ACCME® considers relationships of the person involved in the CME activity to include financial relationships of a spouse or partner. The ACCME deems employment by a commercial interest to be a non-resolvable conflict for the employee and his/her spouse/partner unless the course content is unrelated to products or services provided by the commercial entity. See ACCME Policy for clarification www.accme.org/education-and-support/video/tutorials/ensuring-independence-role-employees-accme-defined-commercial.

Course Director/Planner/Reviewer CME Disclosure Form

This form must be completed prior to the planning of the CME activity for any individual (course director, planner, or content reviewer) in a position to control the content of the CME activity.

Title of CME Activity:	
Date(s) of CME Activity:	
Your role in this CME Activity:	<input type="checkbox"/> Course Director <input type="checkbox"/> Planner <input type="checkbox"/> Content Reviewer <input type="checkbox"/> Author/Presenter for Enduring
Full Name and Degree:	
Do you or your spouse/partner have, at present or within the past 12 months, financial relationships with any <u>Commercial Interest</u> that are RELEVANT TO THE COURSE CONTENT ? <u>Commercial Interest:</u> Any entity producing, marketing, re-selling or distributing health care goods or services consumed by or used on patients with the exemption of non-profit or government organizations and non-health care related companies. The ACCME does not consider providers of clinical services directly to patients to be commercial interests (e.g. liability/health insurance providers, group medical practices, hospitals, nursing homes, rehabilitation centers, diagnostic labs).	
<input type="checkbox"/> No. (Sign and date below. Complete Attestation on next page.)	
<input type="checkbox"/> Yes. (Complete table below, then sign and date. Complete Attestation on next page.)	

Check Appropriate Boxes	Type of Financial Relationship Include spousal/partner relationships (WITHIN THE PAST 12 MONTHS)	Name of Company (WITHIN THE PAST 12 MONTHS)
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	1. Employment by commercial entity (If the content of the course relates to the business line or products of your or your spouse/partner's employer, you may not serve as a course director, planner or content reviewer. The ACCME considers this a non-resolvable conflict of interest.)	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	2. Patent royalty	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	3. Intellectual property rights	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	4. Advisory Board(s) member with monetary and/or other compensation (e.g., travel expenses)	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	5. Fees for speakers' bureaus received directly from commercial interest	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	6. Contracted research which also includes research funding where the institution gets the grants and manages the funds, and you are the principal or named investigator on the grant.	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	7. Ownership interest (stocks, stock options, or other ownership interest excluding diversified mutual funds)	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	8. Consulting fees	
<input type="checkbox"/> Self <input type="checkbox"/> Spouse/Partner	9. Other (please specify):	

I represent that the foregoing information is complete and truthful, and I agree to update this form within 30 days if I acquire any new financial relationships.

Signature of Reporting Individual:	Date of Submission:
-------------------------------------------	----------------------------

Course Director/Planner/Reviewer CME Attestation Form

Title of CME Activity:	
Date(s) of CME Activity:	
Your role in this CME Activity:	<input type="checkbox"/> Course Director <input type="checkbox"/> Planner <input type="checkbox"/> Content Reviewer <input type="checkbox"/> Author/Presenter for Enduring
Full Name and Degree:	
Directions: Read the ACCME Content Validation Statement below, then read and check ALL of the following boxes to attest to your understanding of and willingness to comply with the corresponding statement; sign and date form.	
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<input type="checkbox"/> HIPAA Compliance: I will remove all patient identifiers (name, birth date, address, phone number, medical record number, account number, social security number, etc.) from my presentation materials. I will not use identifiable photographs of patients, unless I have obtained written patient permission.	
Signature:	Date: