

Director Comments	1
Standards for Commercial Support	2-6
Calendar of Events	6

Keeping You Updated In CME

Director's Comments

This issue of the CME Newsletter begins with the continued discussion about the ACCME Standards for Commercial Support. For each component, we provide the exact wording of the Standard, along with information on how the Standard is interpreted and applied for CME programs at Jefferson.

The issue also provides a robust calendar of Upcoming CME Events. We encourage you to visit our website to learn more about these continuing professional development opportunities.

35th Annual Alliance for CME Conference

The 35th Annual Alliance for CME Conference was held January 27-30 in New Orleans, attracting over 1200 participants. Jefferson's OCME had two abstracts accepted for presentation at this conference.

Jeanne Cole led a workshop entitled "**Applying CACME's Risk Stratification Process to Mitigate Potential Non-compliance with the Standards for Commercial Support**", co-presenting with Tracy Allgier-Baker from Penn State Hershey and former Jeffersonian Derek Warnick (now with the Curatio CME Institute in Exton, PA). This workshop focused on ways to manage activities that receive commercial support by developing appropriate interventions in the planning, implementation, delegation, review, monitoring, and evaluation stages of an activity. The core of the workshop was an interactive, case based discussion. With the current environment of scrutiny and questions about commercial influence in CME, the workshop provided suggestions for maintaining separation of education from promotion and improving compliance with the ACCME Standards.

We also presented a poster: "**CME 'INTAKE': Creating an Online Tool to Implement the ACCME Updated Criteria at a Medical School**". Co-authored by Jeanne Cole, Pauline Sylvester and Vaughn Wurst, this poster presented Jefferson's approach to compliance with the ACCME Updated Criteria. The use of online technology, the clear linkages between the Intake process and the Criteria, and the built-in processes available for monitoring and reporting generated a lot of interest and questions throughout the conference. We anticipate that our use of this process will be a key factor in our favor when we submit for ACCME reaccreditation in 2011. We'd like to take this opportunity to acknowledge the work of Chris Braster, from AISR, in the operationalizing the Intake system as it has evolved in response to changing ACCME requirements.

You can access these and other national presentations from our website at <http://jeffline.jefferson.edu/jeffcme/office/presentations.html>

ACCME Standards for Commercial Support 3.1 – 3.3

This issue continues our review of the ACCME Standards for Commercial Support. We now come to **Standard 3: Appropriate Use of Commercial Support**. Standard 3 is broken into 5 sections covering **Independence from Influence, Written Agreements, Expenditures for the CME Provider, Expenditures for the Learner, and Accountability**. This issue focuses on the Standards relating to Influence and Notification. The remaining sections will be covered in future newsletters.

To give you a better understanding of how these Standards affect you as a course planner, faculty or activity participant, we will address each standard individually. For each section, we present the Standard, its typical interpretation by the ACCME (“Explanation”), describe why the Standard is considered important (“Rationale”), and how Jefferson’s OCME approaches compliance and documentation requirements relating to the Standard (“The Jefferson OCME Approach”).

Remember, the ACCME defines a “commercial interest” as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients

The thrust of Standards 3.1-3.3 is that commercial interests must be “hands off” when it comes to certified CME activities. These standards address how the CME Provider (ie, Jefferson) must control the finances and the design and implementation of a certified CME activity.

ACCME Commercial Support Standard 3.1

The provider must make all decisions regarding the disposition and disbursement of commercial support.

Explanation –

If a CME Provider accepts support in any form from a commercial interest, the Provider is solely responsible for how that support is used. The commercial interest may not dictate to the CME Provider how much to pay, to whom, or for what. Once the support is given, the funder should step back from any involvement in how it is used.

Rationale –

Control of funds is an indicator of independence, and supports compliance with Standard 1 of the Standards for Commercial Support (Our December 2008 newsletter discusses Standard 1). The funder/commercial interest may request information about how you plan to spend their funds in conjunction with a CME activity or program, and they may request information after the fact about how you actually used their funds, but they cannot direct the actual use or allocation of the funds.

The Jefferson OCME Approach to Compliance –

Demonstrating compliance with this standard includes documenting control of funds from the beginning. Control of funds starts by knowing what your fiscal needs are and developing a realistic budget early in the planning process, **prior** to any communication with potential funders. This is why the CME process at Jefferson requires submission of an itemized budget for every CME activity being considered for credit. Post-activity expense reports are also required to complete the documentation that funds were expended according to the budget.

The OCME can assist you in developing accurate budget projections, which becomes your roadmap to how funds are utilized. We must also review any budget reconciliation reports before they are submitted, if they are required by commercial interests.

ACCME Commercial Support Standard 3.2

A provider cannot be required by a commercial interest to accept advice or services concerning teachers, authors, or participants or other education matters, including content, from a commercial interest as conditions of contributing funds or services.

Explanation –

The issue of undue influence by a commercial interest on CME education has been a primary concern of government, the medical profession, the CME industry, and others over the past few years. Under no circumstances should a commercial interest (or its representative) make recommendations on matters concerning the educational activity, such as the selection of any specific topic, presenter, author, target audience or educational design, nor should the commercial interest tie their support to input in these areas. The planners of a CME activity should not seek input on these matters from any commercial interest.

Rationale –

Independence in education from undue influence must be maintained throughout the planning process to avoid even the appearance of bias towards a commercial interest.

The Jefferson OCME Approach to Compliance –

The planning process for CME activities at Jefferson incorporates documentation for identified practice performance gaps and educational needs, and requires identification of all individuals in a position to influence content. The Office of CME and the CME Committee review the submitted documentation for freedom from commercial influence as part of its approval process.

ACCME Commercial Support Standard 3.3

All commercial support associated with a CME activity must be given with the full knowledge and approval of the provider.

Explanation –

Standard 3.3 addresses the need for **transparency** in funding for an educational program. Commercial support is not limited to funds, but may also include in-kind donations of equipment or supplies, assistance with marketing [with written authorization from the OCME], or other more unusual arrangements for support. The CME Provider must be aware of all types of support received from a commercial interest for an educational program in order to assure the activity meets all ACCME and Jefferson requirements.

Rationale –

If funds or other support are received for a program without the knowledge of the CME Provider, the independence of the program can be called into question. Support given outside of the Standards for Commercial Support will create an unresolvable conflict of interest for the individual(s) or organization accepting such support. Further, support given/accepted without the knowledge of the CME Provider places the activity in non-compliance. Educational programs that are non-compliant with this standard may have credit withdrawn and/or have to return all funds received.

The Jefferson OCME Approach to Compliance –

During the CME application process, activity planners identify whether the activity will seek commercial support. Jefferson requires that all commercial support be governed by a formal “Letter of Agreement” (to be discussed in detail in a future newsletter) that identifies Jefferson as the CME Provider and explicitly identifies the name of the commercial interest, and the type of and amount of support. All CME-related Letters of Agreement must be approved by an authorized member of the Jefferson CME Office, in advance of the start of the activity. The Letters of Agreement are tracked by activity and funding organization to aid in appropriate management of funds.

No additional funds should be received from the commercial interest either directly or indirectly for the activity that are not covered under the approved educational grant agreement. ACCME Standards prohibit the commercial interest from directly paying an individual honorarium or activity-related expenses. Note that University policy prohibits commercial interests from directly supplying food for CME and other educational activities.

Summary

Independence from commercial influence is a keystone of certified CME. **Standards 3.1-3.3** outline the expectations for behavior by the CME Provider and by the commercial interest when commercial support is accepted for a certified CME activity. Control of funds, control of content and other decisions relating to the educational activity, and transparency in funding demonstrate compliance with these Standards.

Noncompliance will disqualify the CME activity from being designated for AMA PRA Category 1 credit™.

In our next newsletter, we will review Standards 3.4 – 3.6, which focus on the required elements of written Letters of Agreement when commercial support funding is accepted. If you have questions about these Standards, please contact the Office of CME at jeffersoncme@jefferson.edu, or 215 5-955 6992.

Calendar of Events Fall & Winter Conferences

February:

20th-26th

15th Annual JACXCS Jefferson Anesthesia Conference

March:

3rd – 5th

37th Annual Course in Electrodiagnostic Medicine

4th-5th

Practical Emergency Airway Management Course

4th – 7th

Transitions in GME- 2010 ACGME Educational Conference

6th – 8th

Annual Hand Surgery Conference

6th

Atrial Fibrillation Summit

10th

Control the Bleeding, Control the Pain: New Therapeutic Advances

10th – 11th

44th Annual James L.A. Roth Visiting Professorship in Gastroenterology

10th – 13th

OB Core Ultrasound

12th

2nd Annual InterProfessional Care for the 21st Century

18th – 19th

9th Annual Cerebrovascular Update

18th – 19th

Fetal Echo Ultrasound

26th

Hot Topics in Trauma 2010- Unexpected Survivors

May:

7th

Navigating Spinal Care



To register for an upcoming event, or to find additional information, please visit the CME website:

[OCME Website](#)

To reach us by email: jeffersoncme@jefferson.edu

For a full list of our upcoming events please click here, [Calendar of Events](#)

Please contact the OCME if you are interested in having producing a CME activity and would like help with Coordination, Registration, Fund Raising and/or Receiving AMA PRA Category 1 Credit(s)™.

The OCME welcomes all feedback. Please let us know how we are doing or what you think will make the newsletter better.