

VUMC OCPD Standard Operating Procedures on Commercial Support

This Standard Operating Procedures document on Commercial Support exists to provide guidance for staff, faculty, and planners to implement and comply with ACCME Standards for activities provided by Vanderbilt University Medical Center (VUMC).

For All VUMC CME activities that accept commercial support (defined as financial or in-kind support from ineligible companies) the Office for Continuous Professional Development (OCPD) ensures that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. The support does not establish a financial relationship between the ineligible company and planners, faculty, and others in control of content of the education.

All commercial support management is overseen by the VUMC Office for Continuous Professional Development.

- VUMC OCPD will neither seek nor receive guidance, either nuanced or direct, from commercial interests relative to the content of the activity or on who should deliver that content. The identification of needs, determination of educational objectives, selection and presentation of content, educational methods and evaluation is solely the responsibility of the activity director/planning committee and OCPD.
- **The CME Activity AD/CME Associate notifies the VUMC OCPD about interest in requesting commercial support. All commercial support requests must be overseen by the VUMC OCPD, and the funds are directly disbursed to the OCPD.**
- A VUMC OCPD-approved Letter of Agreement (LOA) that reflects that as the accredited provider VUMC OCPD is solely responsible for the administration, content, faculty selection, quality, and integrity of all CME activities, must be utilized whenever an activity receives commercial support.
 - **No funding can be accepted without a signed LOA.**
 - **VUMC OCPD must oversee the contractual process between the activity receiving commercial support and the organization providing commercial support. The LOA must be between VUMC OCPD and the specific commercial supporter, signed by both parties, and the total dollar amount of the grant will be reflected.**
 - **The agreement must be executed prior to the start of accredited education.**
 - The terms, conditions, and purposes of the commercial support must be documented in a written LOA between VUMC OCPD and the commercial supporter.
 - VUMC OCPD 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.
 - Commercial supporter cannot participate in the accredited educational activity.
 - Commercial supporter cannot be given levels based on support provided (for example, gold, platinum etc.).
 - Commercial supporter cannot be provided discounted or free registration to the accredited activity.
 - Direct payment by a commercial supporter for any aspect of a CME-certified activity, i.e., lunch or dinner, is strictly prohibited.
 - Limited participant information (i.e., name, state) can be made available upon request to commercial supporters and is not provided in advance of the activity. No additional information regarding activity participants will be distributed.

- VUMC OCPD will keep a record of the amount and type of commercial support received and how it was used, and provide that accounting, upon request, by the accrediting body or by the ineligible company that provided the commercial support.
- VUMC OCPD will disclose to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education. Disclosure must not include the ineligible companies' corporate or product logos, trade names, or product group messages.

PROCEDURES

- **CME Activity AD/CME Associate notifies the VUMC OCPD about interest in requesting commercial support.**
- **OCPD provides a commercial support request template letter and a template Letter of Agreement. Utilizing these documents, the Activity Director and/or CME Associate then sends the initial email to each company to request commercial support, copying the OCPD on these requests.**
- **The LOA must be between VUMC OCPD and the specific commercial supporter, signed by both parties, and the total dollar amount of the grant will be reflected.**
- **All commercial support management must be overseen by the VUMC OCPD, and the funds are directly disbursed to the OCPD.**
 - The VUMC OCPD accepts funds in response to a request for commercial support.
 - The VUMC OCPD transfers funds directly to the CME Associate/Department.
 - The CME activity AD/CME Associate spends commercial support funds in one or more of the categories in the budget submitted with the CME application.
- VUMC OCPD must be identified as the payee for funding requests.
- LOAs submitted to VUMC OCPD for signature on or after the start date of an activity will result in refusal to sign, accept commercial support funds and/or return of commercial support funds.
- A commercial supporter may not make direct payments to a joint provider, faculty, or others involved with the activity.
- Social events and meals should be modest and must not compete with or take precedence over educational events.
- VUMC OCPD will not use commercial support funds to pay for travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of a CME activity.
- VUMC OCPD may use commercial support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, joint provider, or educational partner.
- A financial summary must be provided no later than 60 days after the conclusion of the CME activity detailing the amount of commercial support funding received and the commercial interests providing the funds and all CME activity related expenses.

If the OCPD becomes aware of a potential transgression of VUMC OCPD procedures for commercial support proposals, the following steps take place: (1) the OCPD team contacts the Activity Director(s) and reviews all related documents to determine if there was indeed a transgression and (2) if there is confirmation that a transgression did exist, the following steps would take place – (a) the Activity Director(s) in transgression is/are notified and provided documentation of why this situation is considered a transgression, (b) disqualification of the activity for future accreditation, and/or potential disqualification of specific Activity Director(s) from planning future CME activities.