Name of Policy:	College of Medicine & Life Sciences: **Guidelines for Commercial Support-Educational Grants**
Policy Number:	3364-81-12-206-03
Approving Officer:	Executive Vice President for Clinical Affairs/Dean, College of Medicine & Life Sciences
Responsible Agent:	Assistant Dean of Continuing Medical Education
Scope:	UT faculty, staff, students and joint sponsors

Revision date: 6/8/22

Original effective date: 10/1/09

☐	New policy proposal		Minor/technical revision of existing policy
☒	Major revision of existing policy	☐	Reaffirmation of existing policy

(A) Policy statement

Specific procedures must be followed when planning and administering AMA PRA Category 1 Credit™ activities that receive commercial support funding. All commercial support associated with a continuing medical education (CME) activity must comply with the **ACCME Standards for Integrity and Independence in Accredited Continuing Education** and must be given with the full knowledge and approval of **The University of Toledo Center for Continuing Medical Education (UT-CME)**.

Only the CME Office is authorized to contact, solicit, or correspond with any commercial supporters, vendors, or exhibitors in connection with CME activities. Departments, divisions, planning committees, and joint sponsors are not permitted to independently solicit or accept commercial support.

(B) Purpose of policy

To maintain compliance with the **ACCME Standards for Integrity and Independence in Accredited Continuing Education** and institutional requirements, all educational activities receiving external commercial support must be administered under the direction of the CME Office. This ensures that commercial support is managed independently of any influence from ineligible companies and that all interactions with vendors are centralized through the CME Office.

(C) Procedure

1. **There must be complete independence from ineligible companies** (as defined by the ACCME) in the planning, development, delivery, and evaluation of AMA PRA Category 1 Credit™ CME activities. All procedures must comply with the **ACCME Standards for Integrity and Independence in Accredited Continuing Education**.

a) Independence must be maintained for the following: identification of CME needs; determination of educational objectives; selection and presentation of content; selection of all persons and organizations that will be in a position to control the content of the activity; selection of educational methods; and evaluation of the activity. See policy "Conflict of Interest and Disclosure" (3364-81-12-206-04) for more explicit instructions regarding content requirements.

b) All individuals in a position to control educational content must disclose all financial relationships with ineligible companies as defined by the ACCME. An individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, faculty, or author, and may not have any role in the development, management, presentation, or evaluation of the CME activity

c) An ineligible company may not serve as a non-accredited partner in a joint providership relationship.

d) The content and format of a CME activity must promote improvements or quality in healthcare and must not promote a specific proprietary business interest of a ineligible. Educational materials, such as slides, abstracts and handouts, must not include any advertising, trade name or a product-group message.

e) Arrangements for commercial exhibits, advertisements, or other promotional activities must be completely separate from CME content. Such arrangements must not influence planning or interfere with the presentation, nor can they be a condition of the provision of commercial support for CME activities.

f) **All contact with potential or confirmed commercial supporters, vendors, or exhibitors must be handled exclusively by the CME Office.** Planning committees, departments, or joint sponsors are not permitted to independently solicit, negotiate, or correspond with ineligible companies or their representatives

(2) The sponsoring department or joint entity must indicate the intent to apply/utilize funds from commercial support on the credit application.

(a) Funds from a commercial source must be in the form of an unrestricted educational grant. These funds are to be made payable to University of Toledo through CME foundation accountOnly the CME office is authorized to solicit, request, or accept commercial support on behalf of CME activities.

No funds from an ineligible companymaybe paid directly to faculty, presenters, planning members or any others involved with the activity. UT does not use funds that originate from a commercial source to pay for travel, lodging, registration fees, honoraria or personal expenses for non-faculty attendees. The funds may be used to pay reasonable honoraria, travel, and reimbursement for out-of-pocket expenses for guest faculty (as indicated in Honoraria Policy 3364-81-12-206-02).

(b) The terms, conditions, and purposes of the commercial support must be documented in a written agreement between the commercial supporter (ineligible company) and The University of Toledo (provider). The agreement must include the provider, even if the support is given directly to the provider's joint sponsor. The written agreement must specify the commercial interest that is the source of commercial support. Both the commercial supporter and the provider must sign the written agreement.

(c) The CME Office must maintain **accurate documentation** detailing the receipt and expenditure of all commercial support. This documentation must be included in the credit approval process and retained in accordance with recordkeeping requirements.

(3) The source of all commercial support must be disclosed to the learners prior to the start of the educational activity, in compliance with ACCME requirements. Disclosure may appear on the activity's promotional materials, syllabus, printed enduring materials, or the opening page of online content. Disclosures must never include corporate or product logos, trade names, or product group messages.

(4) Product-promotion materials or product-specific advertisement of any type is prohibited within or during CME activities. Promotional materials for live (exhibits) or enduring (printed or electronic) must be kept separate from CME. No promotional materials may be displayed or distributed in the same room immediately before, during or immediately after a CME activity.
Vendors must follow the UT vendor policy (Interactions with the Pharmaceutical and Medical Device Industry at the University of Toledo Health Science Colleges and at the University of Toledo Medical Center 3364-81-04-027-00). . Commercial support representatives may attend a CME activity, but they may not engage in sales activities or promotional activities while in the room where the activity takes place.

(5) Social events or meals at CME activities cannot compete with or take precedence over the educational event and must be clearly separate from accredited continuing education.

Approved by: _____ Name Executive VP for Clinical Affairs, Dean, College of Medicine & Life	**Policies Superseded by This Policy:** • *A-10-12-00003-0206 Guidelines for Commercial Support – Educations Grants (previously updated December 2005)* Initial effective date: 9/1/01 Review/Revision Date: • 10/1/09

Sciences _____ Title _____ Date *Review/Revision Completed by:* *CME Advisory Committee* *Assistant Dean of Continuing Medical Education*	• 08/06/12 • 04/13/15 • 09/15/15 • 02/12/19 • 6/8/22 Next review date: 6/8/2025