

UC San Diego Continuing Medical Education Policy on Commercial Support

UC San Diego Continuing Medical Education (UCSD CME) is committed to presenting CME activities that promote improvements or quality in healthcare and are independent of the control of commercial interests. As part of this commitment, UC San Diego Continuing Medical Education has outlined the terms, conditions, and purposes of commercial support for its CME activities. Commercial Support is defined as financial, or in-kind, contributions given by a commercial interest, which is used to pay all or part of the costs of a CME activity.

Independence

- UCSD CME activities are for scientific and educational purposes only and will not promote any specific proprietary business interest of the commercial interest.
- The accredited provider is responsible for all decisions regarding the identification of educational 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 CME, selection of education methods, and the evaluation of the activity.
- A commercial supporter cannot specify the manner in which the provider will fulfill the requirements of the ACCME's Elements, Policies and Standards.

Appropriate Use of Commercial Support

- The accredited provider will make all decisions regarding the disposition and disbursement of the funds from the Commercial Interest.
- 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.
- 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, joint sponsor, or any others involved with the supported activity.
- The accredited provider will, upon request, furnish the commercial interest documentation detailing the receipt and expenditure of the commercial support.

Commercial Promotion

- The commercial interest may not be the agent providing the CME activity to the learners.
- Employees of commercial interests can serve as planners or speakers in an accredited CME activity if the content of CME that the employee of the commercial interest controls does not relate to the business lines and products of its employer.

Disclosure/Acknowledgement

The Accredited Provider will ensure that the source of support from the Commercial Interest, either direct or "in-kind," is disclosed to the participants, in activity brochures, syllabi, and other program materials, and at the time of the activity. This disclosure will not include the use of a trade name or a product-group message. The acknowledgment of commercial support may state the name, mission, and clinical involvement of the company or institution, if approved by UCSD CME.

For further information about commercial support rules and regulations, please visit the ACCME website and the [ACCME Standards for Commercial Support](#). The Standards for Commercial Support describe practices that the ACCME considers appropriate for accredited providers to ensure that CME activities are independent, free of commercial bias and beyond the control of persons or organizations with an economic interest in influencing the content of CME. The Standards for Commercial Support describe six Standards: (1) independence, (2) resolution of personal conflicts of interest, (3) appropriate use of commercial support, (4) appropriate management of associated commercial promotion, (5) content and format without commercial bias, and (6) disclosures relevant to potential commercial bias. These Standards underscore continued voluntary self-regulation by the CME community, ensuring that physicians have opportunities to engage in commercially unbiased life-long learning facilitated by accredited providers.

Letters of Agreement

All commercial support of continuing medical education requires a written agreement, outlining the terms, conditions, and purposes of the support. UCSD CME has developed a Letter of Agreement (LOA) template that may be used. We also accept LOAs issued by the grant company, as long as in compliance with the ACCME standards, and UCSD CME policies and procedures.

The Letter of Agreement for commercial support will also need to:

- be executed between the UCSD CME (the accredited provider) and the commercial supporter. This means that UCSD CME's and the commercial supporter's name must be included in the written agreement as the parties entering into the agreement for commercial support.
- specify the organizational name of the commercial interest(s) that supplied the funds.
- include the name of the joint sponsor or third party that would be receiving and disbursing the funds (when applicable).
- specify what funds or in-kind services will be given by the commercial supporter to support the provider's activity; and itemize how the accredited provider will use the commercial support in the development and presentation of the CME activity.
- be signed by both the UCSD CME and the commercial interest providing the commercial support. Third parties and/or joint sponsors may also sign the written agreement but may not sign it instead of the UCSD CME.
- be signed by all parties prior to the activity taking place.

Letters of agreement may be in paper, digital or electronic form. An electronic signature is acceptable as evidence that written agreements are signed.