

Commercial Support Policy

The CME Certification Request packet includes everything you will need to document your compliance with the Standards for Commercial Support of the Accreditation Council for Continuing Medical Education (ACCME). Continuing Medical Education (CME) must be free of the control of commercial interests. The ACCME believes that independence from commercial interests will help ensure that CME is free of commercial bias and, therefore be in the best interest of the public.

1. Commercial support shall be provided with the knowledge, consent, and written approval of the Office of Continuing Medical Education (OCME) and shall be in the form of an educational grant. No other payment from a commercial interest shall be given to the an Activity Director, planning committee members, faculty (speakers or presenters), authors, joint sponsor, or any others involved with the supported CME activity.

Content without commercial bias

2. CME certified activities will be free of control of commercial interests in both planning, and implementation. The use of peer and content review to ensure data validity is encouraged. A balanced view of therapeutic should be included in content and disclosure should be made to participants regarding the source and type of evidence use for content.

Disclosure of relationships to participants

3. All individuals who are involved with the content of an educational activity are required to disclose all relevant financial relationships in any amount occurring within the past 12 months related both to content and to commercial supporters of the activity including:
 - ❑ The name of the individual
 - ❑ The name of the commercial interest(s)
 - ❑ The nature of the relationship the individual has with each commercial interest.
 - ❑ Any individual who does not disclose relevant financial relationships will be disqualified from participating in the planning and implementation of educational activities.
 - ❑ All relationships and source of support whether in-kind or otherwise must be disclosed in a text format (print, slide, online) to participants prior to the presentation of the content of the activity; if no relationship exists, this must be disclosed in the same manner.
 - ❑ The source and type of evidence for key teaching points must be made clear to participants
 - ❑ The OCME will monitor all activities to identify and resolve all conflicts of interest prior to the educational activity being delivered to learners.
4. A commercial interest cannot take the role of non-accredited partner in a jointly sponsored activity.
5. All decisions regarding an OCME certified CME activity will be made free of the control of any commercial interest including:
 - a. Identification of CME needs
 - b. Determination of learning objectives
 - c. Selection and presentation of content
 - d. Selection of all persons and organizations that will be in a position to control the content of the CME activity.
 - e. Selection of educational methods

f. Evaluation of the activity

6. **Commercial Support Letter of Agreement Forms** must be completed and signed by both the Activity Director and company representative for each commercial support occurrence. **All letters of agreement requires the signature of the accredited provider.** This form may be duplicated and used for each commercial support occurrence. Letter of Agreement Form from Pharmaceutical companies may also be used.
7. **Grants made payable to: SUNY - Office of CME.** The OCME will process all disbursements to the appropriate parties. Please have the pharmaceutical representative contact the OCME for additional information.
8. **Grants made payable to the Clinical Departments (SUNY and Affiliates).** With “full knowledge and approval” of the OCME, the clinical departments at SUNY and at our affiliates may make all disbursements. A record must be kept of all disbursements and entered on your Final Budget form, which will be submitted to the OCME at the conclusion of the activity.
9. At no time should the commercial supporter pay an honorarium or other disbursements directly **this includes catering expenses.** You must follow the outlined policy. It has been established to make certain that the OCME receives all documentation necessary, to ensure that every CME activity held under the auspices of SUNY Downstate complies with the Standards of the ACCME.
10. **CME Certification Request Form** - On page 3 of the Credit Request Form form, you will find a section to indicate whether or not commercial funds will be used. In this section, you must indicate whether the activity will be funded all or in part by departmental funds, commercial support, etc. **Please do not put “N/A”, as this is not acceptable.**
11. **Preliminary Budget Form** is to be submitted with your CME Certification Request form. The estimated costs for your activity, which includes your estimated commercial support funds, and the names of your supporters, must be included on the form.
12. **Final Budget Form** is to be submitted when your CME activity has concluded. It outlines total costs, which includes departmental or divisional funds, income from participant fees, and funding from commercial companies. It includes a breakdown of expenses, and a record of disbursements made from commercial support funding. **Final budget information is essential to the completion and compliance of your CME activity.**
13. **Exhibit Fee:** A fee paid by a commercial interest to display and promote their products. Exhibit fees are considered a business transaction – they are not considered commercial support.
14. **Sponsorship:** “SUNY Downstate Medical Center” is the sponsor of all CME activities accredited by ACCME, not the pharmaceutical company and not the Hospital. Therefore, when you read the Letter of Agreement, the word “sponsor” refers to SUNY Downstate.
15. **Signature:** All Letters of Agreement must be signed by the Office of CME at Downstate where “Provider” or “Sponsor” is indicated before the activity takes place.