

Subject: MEDICAL STAFF – CONTINUING MEDICAL EDUCATION	
Effective Date: 01/01/2023 Supersedes: 01/01/2022	Category: Medical Education Committee - CME: Commercial Support Policy
Medical Executive Committee Approval Date: 12/20/2022	Responsibility for review and maintenance of this policy is assigned to: The Medical Education Committee
Policy Applies to: CME: Commercial Support	Author and/or Designee: Mina Kang, MD, Chief Medical Officer

POLICY

In keeping with the mission and values of Saint John's Health Center to ensure that all CME activities and presentations are evidence based and free of commercial bias, the ACCME Standards for Commercial Support adopted by the ACCME in September 2004 and further adopted by CMA are adopted verbatim by Saint John's Health Center (SJHC) (Appendix A).

DEFINITIONS

Commercial Support: 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.

Exhibits: Tables or area where attendees of a CME activity may view vendor displays; area may not be in the same space as the accredited activity.

Commercial Interest (aka Ineligible Company): Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests.

PROCEDURE/GENERAL INSTRUCTIONS

SJHC will accept commercial support if the following guidelines are met:

1. Commercial support may be solicited for educational activities sponsored by SJHC after the activity content has been developed and approved by the Medical Education Committee. A complete budget with income and expenses must be submitted and approved by the Medical Education Committee before commercial support may be solicited.

2. A Letter of Agreement (LOA) (Appendix B) shall be signed by a representative of SJHC and by the commercial supporter in advance of the activity when commercial support is provided for an activity.
3. If a signature from the commercial supporter and a representative of SJHC is not obtained in advance of the activity, the commercial support may not be accepted and any funds collected must be returned.
4. A Letter of Agreement provided by a commercial supporter will be acceptable if it meets the criteria outlined in the ACCME Standards for Commercial Support.
5. Electronic signatures are acceptable forms of signature authority. Original, faxed, scanned and emailed signatures also are acceptable.
6. Copies of signed LOAs will be kept in the activity file for 6 years.
7. The distribution of commercial support will be tracked and noted in the budget. A final reconciled budget must be submitted to the SJHC Medical Education Committee no later than 30 days after the conclusion of the activity.
8. The SJHC educational activity planner shall receive and distribute commercial support funds, adhering to the budget approved by the Medical Education Committee during the approval process.
9. Commercial exhibits and advertisements are promotional activities and not continuing medical education. Therefore, monies paid by commercial interests to providers for these promotional activities are not considered to be commercial support.

REFERENCE(S)/RELATED POLICIES

ACCME / CMA Accreditation Requirements, Standards for Integrity and Independence in Accredited Continuing Education 01/2021
AMA Physician's Recognition Award and Credit System 2017 revision

COLLABORATION

This policy was developed in collaboration with the following involved Departments
Medical Education Committee