

ENTITY <b>CPD Medicine Program Office of Continuing Competency and Assessment (CCA) Rady Faculty of Health Sciences</b>	NUMBER
MANUAL <b>Policy and Procedure</b>	EFFECTIVE DATE September 2017
SUBJECT <b>Commercial Support Policy</b>	REVISED <b>May 2018 March 1, 2022</b>
APPROVED DATE – CCA Leadership Council	June 2018
APPROVED DATE – RFHS Deans Council	November 20, 2018
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REVIEW DATE – 5 years from approval date	November 20, 2023

**PURPOSE**

The CPD Medicine Program of the Rady Faculty of Health Sciences develops, accredits/certifies and delivers high quality, needs-based educational activities for physicians and other health professionals across the province of Manitoba. Our learning activities produce changes in knowledge, attitudes and performance that enable safe, patient-centered and evidence-based care.

This mission requires that College members interact with representatives of the pharmaceutical industry and with representatives of companies in the fields of pharmaceuticals, biotechnology, medical devices, health information technology, hospital and research equipment, and health care supply and services (“Industry”). Interactions with Industry are important and beneficial to the University. However these interactions must avoid any actual, potential or perceived conflicts of interest that may affect the integrity of the College's education, training and research programs, or the reputation of either the College member or the College itself. Because provision of financial support can exert a subtle but measurable impact on recipients’ behavior, the Max Rady College of Medicine has a policy to govern the interactions with Industry ([Interactions with Health-Related Industries Policy 2017](#)).

University CPD providers often receive financial and other support from commercial sponsors or exhibitors. Such support can contribute significantly to the quality of CPD activities but must avoid potential bias or the perception of it. The purpose of this policy is to describe the guiding principles that the Max Rady College of Medicine, its Departments and other Units, and the CPD Medicine Program will meet in planning, designing, implementing, and evaluating CPD activities for which commercial support is received. This policy is closely aligned with the National Standard for Support of Accredited CPD Activities that was adopted by Canada's certifying colleges in 2018.

**POLICY**

**1.0 Role of Scientific Planning Committee**

Every accredited CPD activity must have a scientific planning committee (SPC), led by a Chair that includes representatives of the intended target audience. The SPC is the group responsible for all decisions related to the CPD activity.

The SPC may consider data or advice from all sources, but must ensure that decision-making related to the following CPD program elements is under its exclusive control:

- a) Identification of the educational needs of the intended target audience;
- b) Development of learning objectives;
- c) Selection of educational methods;
- d) Selection and invitation of speakers, moderators, facilitators and authors;
- e) Development and delivery of content; and
- f) Evaluation of outcomes.

Representatives of a sponsor or any organization hired by a sponsor cannot participate in the SPC or in decisions related to CPD program elements. The SPC cannot be required to accept advice from a sponsor as a condition of receiving financial and in-kind support. Specific interests of any sponsor must have no direct or indirect influence on any aspect of the development, delivery or evaluation of an accredited CPD activity

## **2. CPD Activity Planning**

### **2.1 Content Development**

A process must be in place to ensure that those responsible for developing or delivering content at a CPD activity are informed in regards to:

- the identified learning needs of the target audience, including relevant patient populations
- the need to ensure that the content and/or materials presented provide (where applicable) a balanced view across all relevant options related to the content area.
- the intended learning objectives for the activity,
- ensuring that the description of therapeutic options utilize generic names (or both generic and trade names) and not reflect exclusivity and branding
- the requirement to explicitly identify any unapproved ("off label) therapies mentioned in the presentation

The identification of learning needs is not necessarily synonymous with asking physicians what they wish to learn about. Needs may be perceived or unperceived. Unperceived needs may be determined by consultation with public health, regulatory or regional health authorities, or through data and reports that capture physician practice behavior and impact in a way that may not be apparent to clinicians. Needs assessments should not be conducted in such a manner that the outcome is pre-determined or biased towards a particular topic.

An effort should be made to present competing views regarding various therapeutic options. Cases presented must not be constructed in such a way that a sponsor's product is the best choice in all instances.

### **2.2 Event Evaluation**

The SPC must have a process to collect from participants their assessment of the degree to which the accredited CPD activity

- met the stated learning objectives,
- achieved appropriate balance,
- was perceived to demonstrate any commercial bias

### **2.3 Assistance with preparation of educational materials**

College members engaged as speakers or moderators of scientific sessions that receive commercial support must prepare the content of their talks themselves, and not rely on Industry-supplied presentation materials.

### 3. Conflict of Interest

#### 3.1 Written Disclosure

All members of the SPC, speakers, moderators, facilitators and authors must submit a written description of all relationships with for-profit and not-for-profit organizations over the previous two (2) years including (but not necessarily limited to):

- a) Any direct financial payments including receipt of honoraria;
- b) Membership on advisory boards or speakers' bureaus;
- c) Funded grants or clinical trials;
- d) Patents on a drug, product or device; and
- e) All other investments or relationships that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the educational activity.

#### 3.2 Review of Disclosures

It is the responsibility of the SPC chair/planning committee to collect and review conflict of interest declarations provided by SPC members prior to commencement of CPD activity planning. The SPC is responsible to review all disclosed financial relationships of speakers, moderators, facilitators and authors in advance of the CPD activity to determine whether action is required to mitigate potential or real conflicts of interest. The SPC must also have procedures in place to be followed if a conflict of interest comes to its attention prior to or during the CPD activity.

#### 3.3 Disclosure to Learners

3.3.1 The SPC must recognize and disclose to participants any financial and in-kind support received from sponsors of CPD activities using a formal statement that complies with the National Standard. For live events, sponsorship acknowledgement must be disclosed on a page separate from the educational content, and in a specific slide and verbal declaration at the beginning of the event if required by the accrediting College. For asynchronous online activities, sponsorship acknowledgement must be disclosed within the introduction of the educational module, separate from educational content.

3.3.2 Beyond the standard acknowledgement statement of financial and in-kind support outlined in 3.3.1, the linking or alignment of a sponsor's name (or other branding strategies) to a specific educational session or section of an educational program within an accredited group learning activity is prohibited

3.3.3 All scientific planning committee members, speakers, moderators, facilitators, and authors must disclose to participants their relationships as described in 3.1 in the manner required by certifying colleges whose accreditation is in place for the activity.

#### 3.4 Failure to Disclose

Any individual who fails to disclose their relationships as described in 3.1 and 3.3 cannot participate as a member of the SPC, speaker, moderator, facilitator or author of an accredited CPD activity.

### 4. Receiving Financial and In Kind Support

4.1 The terms, conditions and purposes by which financial and in kind support ("sponsorship") is provided must be documented in a **written agreement** signed by sponsor and by the Max Rady College of Medicine, the CPD Medicine Program, or by the chair of the SPC prior to the event occurring (See Appendix A for a sample contract).

4.2 The College, Department or Unit or the SPC can assume or delegate to a third party the payment of travel, lodging, legitimate out of pocket expenses and any honoraria offered to members of the SPC, speakers, moderators, facilitators and/or authors. The College, Department or Unit or the SPC must approve what payments are delegated and retain overall accountability for these payments. Honoraria amounts are calculated in accordance with the CCA Remuneration Policy.

4.3 Participants (who are not members of the SPC, speakers, moderators, facilitators and/or authors) cannot accept payment or subsidies for their travel; lodging or other out of pocket expenses to participate in an accredited CPD activity. This provision does not preclude participants' claiming and receiving compensation from residency programs, employers or the Doctors Manitoba CME Fund, even when activities they attend have received support from these sources. Scholarships or Special Funds may be accepted to permit medical students, residents or fellows in accredited programs to attend CPD activities as long as these funds are approved by their Program Director.

4.4 The travel, lodging or other out of pocket expenses of spouses, partners or other family members of the SPC, speakers, moderators, facilitators, authors or participants cannot be paid for or subsidized in any way.

4.5 Social activities associated with CPD activities cannot occur at a time or location that interferes/competes with or takes precedence over accredited CPD activities.

4.6 Upon request, CPD Providers must disclose how the financial and in-kind support was used for the accredited CPD activity.

4.7 The College, Department or Unit or the SPC has an obligation to ensure that their interactions with sponsors meet professional and legal standards including the protection of privacy, confidentiality, copyright and contractual law regulations.

## **5. Managing Commercial Promotion**

5.1 The scientific planning committee may charge a fee for commercial exhibitors at a CPD event. This fee cannot be included in any funding or sponsorship for the program or event that is received in the form of an educational grant. A separate payment is required for each kind of support.

5.2 Product-specific advertising, promotional materials or branding strategies cannot be included on, appear within, or be adjacent to:

- any educational materials, slides, abstracts and handouts
- activity agendas, programs or calendars of events (preliminary and final);
- any webpages or electronic media containing educational material.

5.3 Product-specific advertising, promotional materials or branding strategies cannot be included on/appear within locations where such CPD programs or events are occurring immediately before, during or immediately after the event. This includes lecture halls, small group discussion rooms, and skills labs.

5.4 Commercial exhibits or advertisements must be arranged in a location that is clearly and completely separated from the CPD program or event. Access to virtual exhibitor meeting rooms and exhibitor advertisements must be provided to learners through a separate link from the educational session.

5.5 The SPC of the program or event cannot be required by an exhibitor or advertiser to accept advice concerning the CPD activity development, delivery or evaluation as a condition of their exhibit or advertisement. Specific interests of any exhibitor or advertiser must have no direct or indirect influence on any aspect of the CPD activity development, delivery or evaluation.

5.6 Any incentives provided to participants by commercial entities associated with an accredited CPD activity must be approved by the planning committee.

## **6. Participation by Industry Representatives at Supported CPD Activities**

Representatives from commercial supporters may attend an educational activity as observers only, and may not participate in question and answer periods or engage in sales activities in the room where the activity takes place. The SPC and the CPD Medicine Program may limit the number of representatives attending an activity.

## **7. Appropriate Use of Commercial Support**

### **7.1 Remuneration [CCA Remuneration Policy]**

Reimbursement amounts for planners, speakers, moderators, and authors are calculated in accordance with the CCA Remuneration Policy.

In addition, commercial supporters of an activity will not enter into any other compensation arrangement with instructors, planners or managers relative to that CPD activity.

### **7.2 Venues for CPD Receiving Industry Support**

Faculty, staff and students affiliated with the College of Medicine may participate in accredited or unaccredited CPD programs that receive financial support from Industry. Such programs may be held on- or off-campus, but must not be held in a restaurant or lounge, including those located in private clubs. Such venues are viewed by the College as being higher risk environments for perceptions of bias and influence for educational events which receive Industry support.

### **7.3 Registration Fees**

#### **Accredited CPD Programs Receiving Industry Support**

Support from Industry may help reduce the cost of registration, but a registration fee must be charged to practicing physicians in order to avoid a perceived or real influence on learning. This fee will be set from time to time by the College, and in the current academic year at a minimum of \$25.00 per hour of accredited learning.

#### **Unaccredited CPD Learning Activities Receiving Industry Support**

Faculty, staff and students affiliated with the College of Medicine may participate in CPD learning activities, programs and conferences that are unaccredited, but must pay the full cost of any food and drink provided. Organizers are expected to offer registration systems that facilitate such payment by attendees.

#### **Regularly Scheduled Series (i.e. Rounds, Journal Clubs) Receiving Industry Support**

Food and drink provided at regularly scheduled series (Grand and Section Rounds, Quality Assurance Rounds, Journal Clubs, etc.) must not be purchased with funds provided directly or indirectly by Industry. These events are viewed as part of the academic mission of the University and commonly are key learning events for postgraduate, graduate and undergraduate learners. Registration fees are not required for regularly scheduled series, faculty development activities and research-oriented activities as these activities are normally provided without charge to participants.

## **8. Social Events**

Financial and in-kind support specifically designated for hospitality will not be accepted. Commercially supported social events (including meals) at CPD activities must not compete with nor take precedence over educational events. The approved educational activity must clearly have greater importance and time duration than any associated social activities. In general, social events, and venues for CPD events receiving commercial sponsorship should be in keeping with arrangements that would normally be made without such sponsorship.

## **9. Acknowledgment of Commercial Support.** [See CPD Brochure Policy]

Acknowledgment will be made of any commercial entity providing financial or in-kind support for an educational activity. Acknowledgements should name the commercial sponsor(s) and must not mention or suggest any endorsement of the commercial sponsor or its product(s). Advertising commercial products by name or indication is not permitted. In addition, the following guidelines apply:

- a) Multipage Course brochures: Commercial sponsorships may be acknowledged in course brochures. Such acknowledgements should appear on a page separate from the program schedule and speaker information, and not on the first page of a brochure.
- b) Posters and flyers: Commercial sponsors may be acknowledged at the bottom of the document in an unobtrusive manner.
- c) Websites and other electronic formats: In a one-page or one-screen format, commercial sponsors may be acknowledged at the bottom of the page or screen in an unobtrusive manner. Links to commercial sponsors may not be established.
- d) In printed or electronic handouts or syllabi, advertisements, and promotional materials may not be interleaved within the pages of the program content. Company Logos may be inserted at the end of the syllabus, not facing any content, and clearly marked with a National Standard sanctioned statement.

## **10. Unaccredited CPD Activities**

“Satellite” symposia are separate sessions or meetings often associated with accredited conferences and other CPD activities. These symposia are frequently produced by commercial interests and are unaccredited. Registrants may perceive such “satellite” programs as integral to the approved event and be unaware of the greater likelihood of commercial bias. Thus, conference organizers must take care to ensure that:

- a) Unaccredited CPD activities are not included or listed within the agendas, programs, and marketing of accredited events
- b) Unaccredited "satellite" sessions are promoted in a way which clearly identifies them as distinct from the accredited event; and
- c) Satellite symposia are not scheduled to take place at times and locations that interfere or compete with the accredited CPD activities.

Commercial Exhibitor/Sponsor Agreement  
CPD Medicine Program, Continuing Professional Development, University of Manitoba

Please check one:		<input type="checkbox"/> Exhibitor - Access to the virtual exhibitor hall and free registration.	
		<input type="checkbox"/> Sponsor	
Title of Activity		Date of Activity	
Company Name		Representative	
Email:		Telephone:	

All activities accredited after January 1, 2018 must comply with the [National Standard for Support of Accredited CPD Activities](#). The National Standard applies to all situations where financial and in-kind support contributions are accepted for the development, delivery and/or evaluation of accredited CPD activities. Activities must also comply with the University of Manitoba Max Rady College of Medicine policy on [Interactions between the Max Rady College of Medicine and Health-Related Industries Commercial Support](#).

The CPD provider/physician organization has an obligation to ensure that their interactions with exhibitor(s)/sponsor(s) meet professional and legal standards including the protection of privacy, confidentiality, copyright and contractual law regulations.

The exhibitor/sponsor agrees to provide the following support for the above noted activity:

Financial support in the amount of: \$   In-kind support (describe):

The signed Commercial Exhibitor/Sponsor Agreement must be received three weeks before activity date for acknowledgment in promotional material. Payment must be received one week prior to activity date and made payable to the CPD provider/physician organization. *This fee is non-refundable except if program is cancelled.*

Recognition (using company name/logos, no product names) in the CPD activity's promotional material and verbally by the moderator in the opening remarks. Exhibitor/sponsor will be recognized separately from the educational content with a statement: "This program has received an educational grant or in-kind support from (exhibiting/sponsoring company.)"

Arrangements for commercial exhibit/sponsor or advertisements cannot influence planning or interfere with the presentation; nor can they be a condition of the provision of commercial support for CPD activities.

Advertisements and promotional materials cannot be displayed or distributed in the educational space (lecture theatre, etc.) immediately before, during, or after a CPD activity. The exhibitor/sponsor will not distribute medication or device samples at the CPD activity.

The exhibitor/sponsor will not provide incentives (regardless of the nature or value of the gift) at the CPD activity unless written approval is received from the CPD provider/physician organization. This includes, but is not limited to items such as textbooks, electronic media, meals, gift certificates, tickets, devices, products or services, travel, hotel accommodations, entertainment or payments for attending a meeting.)

<b>Step 1: To be Completed by the Exhibitor/Sponsor Representative</b>	
<input type="checkbox"/> I Agree	By clicking "I Agree" you acknowledge you will comply with the above terms and conditions.
Date:	<input type="text"/>

Step 2:  Return to:  
CPD Medicine Program, University of Manitoba, Max Rady College of Medicine  
260 Brodie Centre, 727 McDermot Avenue  
Winnipeg, MB R3E 3P5  
FAX: (204) 789-3911

<b>Step 3: To be completed by CPD Provider/Physician Organization</b>	
Name of CPD Provider/Physician Organization:	<input type="text"/>
Name of chair/representative:	<input type="text"/>
Signature of chair/representative:	<input type="text"/>