

CME Commercial Support

Effective date: April 2, 2018

Functional area: Continuing Medical Education (CME)

Department: Spectrum Health Office of Medical Education (OME)

1. **Purpose:** To establish a protocol for Commercial Support for a CME accredited educational activity
2. **Responsibilities:** CME personnel
Spectrum Health Hospitals is accredited by the Michigan State Medical Society to provide Continuing Medical Education (CME) for physicians. The CME Office is responsible for ensuring compliance with the ACCME Essential Areas, Elements, Criteria, Policies and Standards for Commercial Support as well as other regulations as they relate to the quality of CME.
3. **Regulations:**
 - 3.1 Funds received in support of an educational activity from a commercial interest must be in the form of an educational grant
 - 3.1.1 The source of all commercial interest must be disclosed to the learners, including “in-kind” support
 - 3.1.2 Disclosure must never include the use of a trade name(s) or product-group message
 - 3.1.3 Spectrum Health Hospitals CME Office controls all aspects of the management of funds received from a commercial interest. Funds can be used to pay speaker honorarium(s), speaker travel, lodging and meals, and room rental for the educational activity
 - 3.1.4 Detailed receipts must be provided to the CME office for expenses to be eligible for reimbursement
 - 3.1.5 Upon completion of the CME activity, the provider must provide a copy of the final budget to the CME Office
4. **Education Content Independent from Commercial Interest**
 - 4.1 The educational activity shall be planned and the content controlled by the provider, including identification of the need/gap in practice and competency(ies) to be addressed, objectives, selection of speakers, education method and evaluation
 - 4.2 The commercial interest shall have no involvement or influence in the planning of the activity

4.3 Product promotion material and/or product specific advertisement is prohibited during the educational activity. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from CME

5. ACCME Definition of Commercial Support/Interest

5.1 A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients

5.1.1 The ACCME does not consider providers of clinical service directly to patients to be commercial interests - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest

5.2 Commercial interests cannot be accredited providers and cannot be joint providers. Within the context of this definition and limitation, the ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME:

- 501-C Non-profit organizations (Note: ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint provider, but they can be a commercial supporter.)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

ACCME reserves the right to modify this definition and this list of eligible organizations from time to time without notice.

Reference: <http://www.accme.org/requirements/accreditation-requirements-cme-providers/policies-and-definitions/definition-commercial-interest>, 2018