

UNIVERSITY OF COLORADO SCHOOL OF MEDICINE
Office of Continuing Medical Education

Guidelines for Accredited Continuing Medical Education

The Office of Continuing Medical Education (OCME) is responsible for maintaining CME accreditation granted to the University of Colorado School of Medicine. The OCME certifies activities for *AMA PRA Category 1 Credit™*. The following guidelines apply to all activities for accredited continuing medical education by the OCME:

Valid Content

- Do not use any content with commercial bias, logos or other inappropriate information.
- Use generic names for any pharmaceuticals or devices and when no generic is available, use at least three brand names to strengthen fair objectivity.
- Utilize the best available evidence, limit content to eliminate clinical recommendations about one particular product, and include other therapeutic options.
- CME content must not be placed on the website of an ineligible company.

Prevent Commercial Bias and Marketing

- Faculty cannot actively promote or sell products or services that serve their professional or financial interests during accredited continuing education (consulting services, books, software, etc.)
- Course directors and coordinators cannot share the names or contact information of learners with any ineligible company or its agents without the explicit consent of individual learners (opt-out mechanism at registration)

Disclose Relevant Financial Relationships

- All decisions related to the planning, faculty selection, delivery, and evaluation of accredited education must be made without any influence or involvement from owners and employees of an ineligible company.
- All individuals in a position to control content must disclose all financial relationships for the previous 24 months with an ineligible company.
- Employees of an ineligible company cannot participate in the planning process or serve on planning committees.
- Disclosure of Financial Relationship forms must be submitted to the OCME at least 20 days prior to the start of the CME activity to allow sufficient time for OCME review and mitigate potential conflicts of interest.
- An individual who refuses to disclose, as reported to OCME by the course director, will be disqualified from participating in any aspect of the CME activity.
- Disclosure of relevant financial relationships for all teachers, authors, planners, reviewers and others who control content must be presented to the audience prior to the start of any activity.

Commercial Support

- An ineligible company is a company whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.
- Commercial support is monetary or in-kind contributions given by an ineligible company to a CME provider that is used to pay all or part of the costs of a CME activity.
- Course directors must not apply for commercial support prior to CME Activity Application approval.
- Letters of Agreement must be acknowledged by the course director and OCME, signed by CUSOM legal representative, signed by joint provider (if any), and signed by the ineligible company prior to the start of any activity; course directors must notify OCME of all grant applications.
- Funds from an ineligible company must be in the form of an education grant payable to the CUSOM or joint provider, as agreed upon with OCME.
- All commercial support must be acknowledged by informing learners prior to the start of the activity.

- Corporate logos and/or slogans of ineligible companies must not be used when acknowledging commercial support or anywhere within educational materials (website landing pages, brochures, agendas, programs, acknowledgements).
- Commercially supported social events at CME activities must not compete with, nor take precedence over, educational events.
- Funds from commercial support must not be used to pay for learner travel, lodging, personal expenses or honoraria.
- Upon completion of the activity, the course director must submit a financial summary of income and expenses to the OCME.

Ancillary Activities

- Commercial exhibits and advertisements are promotional activities and not continuing medical education; funding paid by ineligible companies for the promotional activities are *not* considered to be commercial support; promotional fees must be separate and distinct from educational grants.
- Commercial exhibits must not influence planning or interfere with the presentation of CME activities, nor can they be a condition of commercial support for CME activities; representatives of commercial supporters may attend the educational activity, but may not engage in sales or marketing activities while in the space/room where the educational activity occurs.
- There must be distinct separation from content that is accredited and that which is not. Marketing, exhibits, and nonaccredited education developed by or with influence from an ineligible company or with planners or faculty with unmitigated financial relationships must not occur in the educational space within 30 minutes before or after an accredited education activity. Activities that are part of the event but are not accredited for continuing education must be clearly labeled and communicated as such.

Honoraria

- CME activities accredited by OCME may pay reasonable honoraria to the planners, faculty, authors and reviewers who develop and implement accredited CME activities. The decision to offer honoraria payment is at the discretion of the course director and the amount of the honoraria is at the discretion of the course planning committee. Payment consideration should be based on usual and acceptable honorarium for the discipline, the location of the activity, as well as the number of presentations developed and delivered. If an activity is receiving commercial support, the grantor may not play any role in determining honoraria rates.
- No individual in a CME activity may receive payment directly from a ineligible company, including honoraria, travel, out-of-pocket expenses or other payments. Rather, the OCME (CUSOM department) or joint-provider must pay directly any individuals considered to be planners, faculty, authors and reviewers of CME activities.
- If planners, faculty, authors and reviewers of CME activities are listed on the agenda as facilitating or conducting a presentation or session, but participate in the remainder of an educational event as a learner, their expenses can be reimbursed and honoraria can be paid for their teacher or author role only. Learners (non-teachers or non-authors) participating in CME activity may not receive any commercial support for travel, lodging, honoraria or personal expenses. Out-of-pocket, per diem, airfare, ground transportation, and other travel expenses for planners, teachers, speakers, instructors, and authors will be paid in compliance with CUSOM policies governing travel reimbursement.