Commercial Support Policies and Procedures

Policy Name: Management of Commercial Support
Policy Number: CS-03-001
Date: 3/27/02

Policy:

The Office of Continuing Medical Education (OCME) makes all decisions regarding the receipt, disposition and disbursement of commercial support. Each activity has a designated account number to which all revenue, including registration fees and commercial support, are credited. Expenses for each activity are paid from its designated account.

All commercial support associated with a CME activity is given with the full knowledge and approval of OCME. All commercial support must be received and processed by OCME and accompanied by a commercial support agreement signed by a designated representative of OCME, typically the Manager of Accreditation and Educational Development or Director of OCME, and the commercial supporter.

Movement of commercial support funds in or out of OCME occurs only with the approval of the Director of OCME.

Background:

The mission of the Office of Continuing Medical Education is to facilitate lifelong learning among physicians and other health care providers so that their practices may reflect the best medical care for their patients. In some cases, ACCME-defined commercial interests contribute funds, services or goods for the development of CME activities. This is known as commercial support.

Commercial support can enhance the delivery of continuing medical education programming. Commercial support also has the potential to introduce commercial bias that threatens the integrity of the activity.

The ACCME Standards for Commercial Support: Standards to Ensure Independence in CME Activities (SCS) are designed to promote independence from commercial interests and to separate promotion from education, thereby mitigating the risk of commercial bias in continuing medical education activities.

This policy is to maintain compliance with to SCS 3: Appropriate Use of Commercial Support (See http://www.accme.org/requirements/accreditation-requirements-cme-providers/standards-for-commercial-support/standard-3 for the full standard.)

Procedure:

- UCSF CME must maintain control of the receipt and disbursement of commercial support.
  - Commercial support is therefore solicited through a collaborative effort between OCME and the Activity Chair.
The effort must occur after the educational activity has been designed and faculty members have been selected.

- OCME conference managers, other UCSF CME coordinators and Activity Chairs complete online grant requests and reconciliations for those commercial supporters that utilize online solicitation.
  - No dialog between the Activity Chair and the commercial supporter is allowed that would influence the content of the activity.
  - Supporters without online grant request systems receive letters of request by mail or fax drafted by the CME coordinator or Manager of Accreditation and Educational Development.

- Commercial support of any UCSF CME activity must be accompanied by a letter of agreement.
  - OCME prefers the use of its standard Commercial Support Agreement.
  - Supporters’ agreements, when required by the commercial supporter, are vetted by the Manager of Accreditation and Educational Development or the Director of OCME. When needed, the Director of OCME will evaluate the agreement with the UCSF Legal Department for appropriateness and compliance with University policies.
  - The agreement must explicitly state that OCME will not solicit, nor will the commercial interest offer, any advice or services as a condition of supporting the activity.
  - The Agreement is signed by a representative of UCSF, typically the Manager of Accreditation and Educational Development or Director of OCME, returned to the commercial entity for signature. The fully-executed copy, signed by UCSF, the commercial supporter and any educational partner(s), is returned to the assigned CME coordinator and filed in the activity’s master file.

- Commercial support received for CME activities must be processed through OCME without exception.
  - Funds are deposited into OCME accounts via the UCSF lockbox, payable to the Regents of the University of California, and transferred to a designated account for each activity.
  - The CME coordinators maintain logs of commercial support and include support information in each activity budget to document receipt of funds and to ensure appropriate reconciliation of expended funds. Commercial support funds are used to support only the activity for which they were granted and are expended from the activity’s designated account.
  - Commercial support funds cannot be used to offset expenses associated with individual learner participation in the activity nor are commercial funds used to directly pay honoraria or travel expenses of individual presenters.
  - Funds are transferred to activity specific accounts internal to UCSF by preparation of journal entry by the Manager of Finance and Registration in the Office of CME.
  - Organizations outside of the UCSF accounting system require payment requests to be processed through the central Controller’s Office. Payment requests and journal entries are approved by the Director of OCME before processing and disbursement. All fund disbursements are reconciled against the OCME general ledger by the Finance Manager on a monthly basis as well as during the financial closing of the activity which occurs within 100 days post-activity.
  - The financial closing produces a final statement detailing each revenue and expenditure source. These statements are reviewed by the Director of OCME before any movement of funds occur.