I. PURPOSE: To establish Continuing Medical Education (CME) policy with Commercial Supporters.

II. POLICY: Wesley Medical Center’s (WMC) Continuing Medical Education (CME) program will maintain responsibility for and control of funds from commercial interests received in support of CME activities that are approved and for complying with all elements of the Standards for Commercial Support of the Kansas Medical Society (KMS) and the Accreditation Council for Continuing Medical Education (ACCME).

III. DEFINITION(S): The purpose of CME is to enhance a physician’s ability to care for his or her patients. It is the responsibility of WMC to assure that the CME activities it designs, and for which it bears responsibility, are for that purpose.

Support for CME programs from commercial interests contributes significantly to the quality of the CME program. This document is intended to outline the responsibilities of the accredited provider, WMC and the commercial interest that provide support (financial or in-kind) for CME programs, in accordance with the KMS Standards for Commercial Support of Continuing Medical Education A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider nonprofit or government organizations, non-health care related companies, or providers of clinical service directly to patients to be commercial interests.

IV. GUIDELINES: Responsibilities of WMC are to:
   a) Control and oversee content, quality and scientific integrity of all activities certified for CME credit.
b) Identify CME needs

c) Determine educational objectives, WMC actively promotes improvements in health care and not proprietary interests of a commercial interest.

d) Select content, faculty, educational methods and materials

e) Make all travel arrangements for faculty

f) Design tools for program evaluation

g) Assure that programs are free of commercial bias for or against any product

h) Assure that any discussion of commercial products in the CME activity will be balanced, presented objectively and based on scientific methods generally accepted in the medical community

i) Design and promote educational activity

j) Oversee slide and other educational material content

k) Demonstrate that each iteration of activities that repeat essentially the same information each time they are given, comply with all the Essential Areas of the KMS

l) Adhere to the Essential Areas of the KMS in all respects when offering educational activities consisting of concepts or materials prepared by proprietary entities, especially with regard to the provisions concerning the independence of the accredited provider in planning, designing, delivering and evaluating such activities

m) Require speakers to disclose when a product is not labeled by the FDA for the use under discussion during an accredited CME activity or that a product is still investigational

n) Select all persons and organizations that will be in a position to control the content of the CME activity

o) Evaluate the activity

p) Make decisions regarding funding arrangements for CME activities

q) Acknowledge commercial support in print, reference to specific products is prohibited

r) Report to commercial supporters and other relevant parties, information concerning expenditures in support of the CME activity upon request

s) Disclose to program participants, prior to educational activities, CME faculty, planners and provider relationships with commercial supporters. This disclosure should be in the form of a brief statement in conference materials. In the event of a regularly scheduled series, this disclosure may be verbal with written attestation of the disclosure signed by the program moderator, a program participant or a representative of the CME department

t) Any identified conflicts of interest will be resolved in accordance with WMC’s Resolution of Conflict of Interest Policy.
Presentations must give a balanced view of therapeutic options. Faculty use of generic names will contribute to this impartiality. If trade names are used, those of several companies should be used rather than only that of a single supporting company.

V. Responsibilities of Commercial Supporter
   a) Commercial Interest may attend an educational activity, with prior approval of the CME department

   b) Commercial Interest must complete the Written Agreement for Commercial Support and turn it in to the WMC CME department 14 days or more prior to the CME activity.

   c) Commercial Interest may not:
      a. Control the planning, content or execution of the activity
      b. Require that WMC accepts their advice or services concerning speakers, invitees or other educational matters, including content, or require the purchase of any product or service supplied by the company as a condition to their provision of support.
      c. Promote commercial products in the same room as the educational activity immediately prior, during or immediately after the CME activity
      d. Disseminate information about the CME activity
      e. Disseminate information about a WMC activity that is pending WMC CME approval or does not identify WMC as the producer of a WMC approved CME activity
      f. Engage in sales activities while in the room where the CME activity takes place
      g. Pay funds, either directly or through third party entities to the director of an activity, faculty or others involved with the supported activity, including, but not limited to travel arrangements and honorarium. All funds must be payable to WMC and mailed or delivered to Wesley Medical Center CME Department, 550 North Hillside, Wichita, KS 67214.
      h. Take the roll of a non-accredited provider in a joint sponsorship relationship

VI. Promotional Activities
   a) Commercial exhibit/vendor arrangements or advertisements shall not influence planning or interfere with presentation of the CME activity
   b) Exhibit placement shall not be a condition of support for a CME activity, nor can they be a condition of the provision for commercial support for the activity.
   c) No commercial promotional material shall be displayed or distributed in the same room as the CME activity immediately before, during or
immediately after and educational activity that has been certified for credit
d) Live or enduring promotional activities shall be kept separate from CME
e) Educational materials that are part of a CME activity, such as slides, abstracts and handouts can not contain any advertising, trade name or a product-group message
f) Print or electric information distributed about the non-CME elements of a CME activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include commercial support names or logos.
g) Commercial interests can not be used as the agent providing a CME activity to learners, e.g., distribution of self-study CME activities or arranging for electronic access to CME activities

VII. Fund Management
   a) Funds from a commercial interest shall be in the form of an educational grant for the support of programming and be made payable to WMC
   b) The terms, conditions and purposes of each grant must be documented by a signed Written Agreement for Commercial Support between the commercial interest, WMC and the activity joint sponsor (if applicable)
   c) All support for CME whether or not it is in the form of an educational grant, must be given with the full knowledge and approval of WMC
   d) Payment of reasonable honoraria and reimbursement of out of pocket expenses for faculty is customary and proper. Refer to WMC’s procedures on honorarium and speaker reimbursement
   e) Funds originating from a commercial source may not be used to pay travel, lodging, registration fees, honoraria or personal expenses for non-teaching attendees, however, funds from a commercial interest may be used to pay for travel, lodging, honoraria or personal expenses for bona fide employees and volunteers of the provider, or joint sponsor
   f) Subsidies for hospitality should not be provided outside of modest meals or social events that are held as a part of the activity
   g) All discussions regarding disposition and disbursement of commercial support are made by WMC
   h) WMC will maintain and produce when needed, accurate documentation detailing the receipt and expenditure of the commercial support

VIII. Scholarships for Medical Students, Residents and Fellows: Scholarship or special funding to permit medical students, residents or fellows to attend
selected educational conferences may be provided, as long as the selection of students, residents or fellows who will receive the funds is made by WMC with the full concurrence of the academic or training institution

IX. Commercially Supported Social Events: Commercially supported, non-CME events that occur before or after the CME activities shall not compete with, nor take precedence over the educational activity

Attachments:
WMC Faculty Disclosure Policy
WMC Written Agreement for Commercial Support