

POLICY ON SUPPORT OF QUEEN'S UNIVERSITY-SPONSORED CONTINUING EDUCATION ACTIVITIES FROM COMMERCIAL SOURCES

May 9, 2005

(to be used in partnership agreements, and other support of
Continuing Education activities)

Introduction/Background

This document outlines Queen's University's policies pertaining to the support of continuing education activities or resources by commercial supporters (e.g. pharmaceutical companies, instrument and device manufacturers). Such activities or resources include but are not restricted to courses, conferences, workshops, University-approved rounds, Internet courses, and the production of learning resources, e.g. CDROM or videotape, designed for participation or use by health professional learners.

The following documents have been employed in the preparation of these statements and form the basis for these policies.

- 1) Canadian Medical Association Policy Summary on Physicians and the Pharmaceutical Industry
- 2) Accreditation Council for Continuing Medical Education Standards for Commercial Support, 1992 (updated 2004)
- 3) American Medical Association Ethical Opinion on Gifts to Physicians from Industry, 1998.
- 4) Association of American Medical Colleges Guidelines for Faculty Involvement in Commercially Supported Continuing Medical Education, 1992.

Definitions of Terms

Accreditation (applies to organizations only): The official recognition by the Council on Accreditation of CME that a medical school has undergone a review process and has proven its ability to plan, present and evaluate CE programs that meet recognized standards of quality. The Royal College of Physicians and Surgeons of Canada has an accreditation process for National Specialty Societies; The Committee on Accreditation of CME accredits Canadian Medical Schools' CE divisions.

Approval (applies to CE courses, events and educational resources): For the purposes of this policy, approval implies the successful review of an educational activity or resource by the program planning committee. Upon approval, the Office of Continuing Education may assign credits of the College of Family Physicians of Canada, the Royal College of Physicians and Surgeons of Canada and the American Medical Association. *Only approved CE events (or other activities) may use the name and logo of Queen's University and/or sponsoring Office of Continuing Education.*

Conference/Meeting: The American Medical Association Council on Ethical and Judicial Affairs defines a legitimate “conference” or “meeting” as any activity, held at an appropriate location, where “the gathering is primarily dedicated, in both time and effort, to promoting objective scientific and educational activities and discourse (one or more educational presentation(s) should be the highlight of the gathering), and the main incentive of bringing attendees together is to further their knowledge on the topic(s) being presented”.

Enduring materials: any printed or similar learning material such as a monograph, self assessment quiz or other item meant to provide educational information to learners.

Provider: Normally non-profit, physician-led organizations or groups planning and delivering CE or continuing professional development (CPD) activities. This definition excludes pharmaceutical companies or their advisory groups, medical and surgical supply companies, communication companies, and other for-profit organizations and ventures/activities.

Sponsor: The institution under whose auspices a course is being held. For Queen’s University-approved courses, the sponsor includes the Office of Continuing Education, generally in conjunction with the course director’s department. Other sponsors may be hospitals, National Specialty Societies, associations or not-for-profit organizations (e.g. The Heart & Stroke Foundation).

Supporter: A company, organization, institution, government agency or other entity (for-profit or not-for-profit) which contributes financial resources to a CE course or other activity.

Teachers: Members of the Faculty of Health Sciences and/or School of Medicine and guest faculty invited by course directors as workshop leaders, lecturers and speakers. The term teachers may also be taken to mean small group facilitators, workshop leaders, and developers of educational resources such as web-based learning modules or printed materials.

Policy

1. Selection of Subjects/Clinical Areas

CE planners are strongly encouraged to use all needs assessment means at their disposal, including reflection on the appropriateness, evidence and clinical burden regarding a specific disease, disorder or subject area, prior to any negotiation with potential commercial supporters.

Following this exercise, and to ensure scientific integrity, the selection of topics, speakers, course materials and enduring materials is entirely the responsibility of the course organizer. If a resource person is recommended by a commercial organization,

he or she must be acceptable to the course director and his/her planning committee. In this way, CE providers may be assured that teachers deliver current, objective, scientifically rigorous, and expert coverage of the subject at hand. *As a condition of contributing funds or services*, a CE provider cannot be required to accept advice or services concerning the selection of teachers, authors, participants or other education matters, including content, from a commercial supporter as a condition of contributing funds or services. *While not a regular custom, commercial supporter representatives may be permitted to join planning committees, so long as the process of content determination abides by the foregoing principles.*

Specifically, the course planner must ensure that the following decisions are made free of bias from a commercial interest:

- (a) confirmation of CE needs
- (b) determination of educational objectives
- (c) selection and presentation of content
- (d) selection of all persons and organizations that will be in a position to control the content of the CE event
- (e) selection of educational methods
- (f) logistics associated with planning and hosting the event or activity
- (g) evaluation of the activity.

The invitation to participate in planning must emanate from the CE provider and/or sponsor, not from the commercial organization.

2. Extent and Nature of Commercial Support

As a general guiding principle, commercially supported social events at continuing education activities should not compete with, nor take precedence over, educational events. (See note 1) Further, registrants' travel arrangements, hotel accommodation and other activities should be in keeping with arrangements normally made without commercial support. They must not be in the control of or handled by, commercial supporters. (See also Section 8.)

3. Disclosures

Examples of disclosures are:

- Affiliations
- Sponsorships
- Honoraria
- Monetary support
- Involvement in clinical trial
- Participation/role/membership on advisory boards
- Stock options
- Patents
- Research grants

These must routinely be reported to the participants of a CE activity by Queen's University faculty and visiting speakers.

The Office of CE is responsible for conveying to participants in writing, any potential conflicts relevant to the topic area of the presentation declared by their course faculty and/or any funding received by the course for their support. Faculty disclosures should cover relevant relationships for a period of two years prior to the course. Disclosures may be made in the course syllabus or handouts, and should be included as the first or second slide in the speakers' presentations. **The speaker must address the slide.** If there are no handouts or slides, a one-page summary of declared relationships should be distributed to participants. Commercial supporter representatives participating on planning committees must be so designated on course brochures and other relevant materials.

To ensure that audiences receive complete information, speakers who have no involvement with industry should inform the audience that they have nothing to disclose, i.e., cannot identify any potential conflict of interest.

Program handout material will include the following statement: "In keeping with accreditation guidelines, speakers participating in this event have been asked to disclose to the audience any involvement with industry or other organizations that may potentially influence the presentation of the educational material. Disclosure may be done verbally or using a slide."

4. Unbiased Presentation of Content

Topics chosen for presentation during a CE activity must not be product or promotion oriented, and presentations must give a balanced view of all relevant therapeutic options available. Use of generic names is required wherever possible. If trade names are employed, use of those of several companies is preferable to that of a single supporting company.

Under certain circumstances, balance may not be possible, in which case the rationale for the inclusion of a one-sided presentation should be explained to the participants (e.g., the discussion of a new product within a class of drugs, or in the instance of research presentations which focus on only one drug within a class and for which there is no drug class evidence). Use of Queen's University or similar institutional logo or name in a manner that constitutes promotion of a product is prohibited.

All speaker and overall course evaluation forms should include a question concerning commercial bias, e.g., "Did the program avoid commercial bias or influence?" Compilations or summaries of evaluation forms must be made available to the CE Office at the conclusion of each approved CE activity.

5. Commercial Displays

When commercial exhibits are part of the program, arrangements for these should be separately considered so as to not influence planning or interfere with the presentation of CE activities. A single commercial organization may support a course and provide a relevant exhibit of its products. Exhibits (including banners which name products) may not be placed in the same room as the educational event except when the locale does not afford adequate or appropriate space to keep the exhibiting displays separate from the educational event, whereby the exhibits may be included in the same room as the educational event.

6. Registrant Issues

a) Registration Fees

A registration fee is generally required from all non-teaching participants, since it is preferable that registrants bear some responsibility for the program in order to avoid perceived or real influence on learning. Exceptions to this general rule include rounds, faculty development activities, and research-oriented programs or events.

Subsidies to underwrite the costs of continuing education conferences or professional meetings may contribute to the improvement of patient care and therefore are permissible. Since the giving of a subsidy directly to the physician by a commercial representative may create a relationship that could influence the use of the company's products, such funds should be received only by the Office of Continuing Education that will in turn use the money to reduce the conference registration fee.

b) Registration Lists

Prior to a Course: Privacy restrictions preclude the distribution of registration lists prior to courses to commercial supporters or attendees under any circumstances. Such lists may be made available to course organizers and teachers in order to make workshop assignments or for other educational purposes (e.g. sending precourse reading material).

A disclaimer should be added to reference material to notify participants that unless otherwise advised their names only, would be included on a registration list distributed to sponsors during CME programs.

c) Payments to Registrants

Course planners must avoid participating in arrangements through which inducements are offered to attend CE programs that might directly or indirectly influence participants' judgment of those products, procedures, devices, etc. that are subjects of the presentation. This includes accepting any support that may induce feelings of indebtedness and thereby affect objectivity. Specifically, commercial supporters may not subsidize or provide travel, lodging, honoraria, or personal expenses directly to practicing health professional attendees or their guests.

In the case of students, residents or fellows in accredited programs, commercial interests may support the participation of such learners by contributing to a scholarship fund. The selection of physician trainees and the expenditures of these funds are the responsibility of the course director and the relevant Postgraduate Program chair, director or designate.

7. Direction of Funds

All funds from a commercial source should be in the form of an unrestricted educational grant payable to the institution or organization sponsoring the CME/CPD activity (e.g. Queen's University). Subsidies specifically designated for hospitality should not be accepted.

8. Payment of Teachers

a) Queen's University Faculty

Faculty members may not be directly supported by, receive gifts from, or be supported by commercial organizations while taking part in Queen's University-sponsored CE activities.

Under exceptional circumstances and at CME's discretion, a Queen's University faculty member may be paid for their contributions to CME. At the discretion of the course director, expenses incurred in making a presentation (e.g. parking) may be allowed.

Additionally, exceptional circumstances may occasionally be recognized. For example, major or lengthy contributions to CE may be reimbursed according to departmental/divisional guidelines and this policy.

b) Guest Faculty/Speakers

It is appropriate for guest faculty at conferences or meetings to accept reasonable honoraria and to accept reimbursement for personal travel, lodging, and meal expenses. However, visiting speakers may not be paid directly by commercial organizations.

c) Token Consultation

Token consulting or advisory arrangements may not be used to justify the compensation of participating health professionals for their time or their travel, lodging, and other out-of-pocket expenses. (See 6c)

9. Acknowledgements

The following outlines ways in which CE may acknowledge commercial support in the following formats. Advertising for commercial products by name or by indication is not permitted.

(a) Course Brochures: Educational grants are documented in course brochures under "Acknowledgements." Commercial supporters may not be listed in the schedule of

activities, the list of faculty or on the front of brochures.

(b) Posters, flyers and one-page brochures: Acknowledgements may be listed at the bottom in an unobtrusive manner.

(c) Websites and other electronic formats: In a one-page or one-screen format, acknowledgements may be listed unobtrusively at the bottom; in a multi-page or multi-screen format, acknowledgements may not be on the main (home) page, on a list of faculty or with the learning activities. Advertisements and promotional materials must not be visible on the screen at the same time as the CME content and not interleaved between computer “windows” or screens of the CME content. Links to commercial supporters’ home pages (but not to pages related to product) may be established, so long as disclaimers are clearly in place, indicating that Queen’s University is not responsible for the linked content. “Pop-ups” are not allowed. Links must open a new window, leaving the educational site open in the background.

(d) In printed CE handouts or syllabi, advertisements and promotional materials may not be interleaved within the pages of the educational content. They may be inserted at the end of the syllabus, not facing any content, and clearly marked as advertising/promotion.

(e) Live activities: In live, face-to-face CE activities, advertisements and promotional materials may not be displayed or distributed in the educational rooms except when the locale does not afford adequate or appropriate space to keep the exhibiting displays separate from the educational event, whereby the exhibits may be included in the same room as the educational event. Providers may not allow representatives of commercial interests to engage in sales or promotional activities while in the CME activity. Commercial supporters may be acknowledged on a slide by company name only.

Approved by CE Advisory Committee:

Approved by Faculty Council:

Notes

(1) “Precedence” is not taken in this clause as implying ordering of social and educational activities, rather it is taken in the sense of importance and duration: Queen’s University-approved activities must give equal or greater weight to educational (vs. social) activities. For example, an event which featured a cocktail reception and dinner and a lecture of shorter duration would not qualify for approval.

**We acknowledge the work done by University of Toronto’s CME Department who created the prototype for this policy*