



Notice about Keeping Your Policies and Procedures Current

The ACCME noted during recent Accreditation Review Processes a “disconnect” between providers’ policies and their procedures used in the planning CME activities, particularly as they relate to the ACCME’s Standards for Commercial SupportSM.

In many cases, provider’s policies for commercial support and written agreements include potentially outdated language that may actually cause your organization to be in Noncompliance. For example, the ACCME has seen conditional statements in written agreements that indicate:

Example #1:

Control of Content and Selection of Presenters and Moderators: <CME provider> is responsible for control of content and selection of organizers, presenters and moderators. Company/Commercial Supporter, or its agents, will respond only to sponsor-initiated requests for suggestions of presenters or sources of possible presenters. Company will suggest more than one name (if possible); and will provide speaker qualifications...

Example #2

Grantor Assistance: <CME provider> may solicit assistance in the planning and production of the activity from [Grantor]. Acceptance by <CME provider> of advice or services concerning speakers, moderators, authors, invitees, or other educational matters, including content, shall not be a condition of support for this activity. [Grantor] may provide services in support of the preparation of activity materials; however, these materials shall not, by their content or format, advance the specific proprietary interests of [Grantor]. If [Grantor] offers to provide a presentation reporting results of scientific research, [Grantor] shall provide to <CME provider> a detailed outline in order to confirm the scientific integrity of the presentation.

In these two examples, the providers’ policies appear to allow commercial interests to control CME content via selection of or influence in decisions made about faculty and the assistance in the preparation of activity materials. These policy statements, if acted upon, would result in performance that is in Noncompliance with C7 (SCS1.1) Independence:

Criterion 7 (SCS 1.1)

A CME provider must ensure that the following decisions were made free of the control of a commercial interest (see www.accme.org for a definition of a ‘commercial interest’):

- (a) Identification of CME 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 CME;
- (e) Selection of educational methods;
- (f) Evaluation of the activity.

Please review your policies and procedures on a regular basis in order to ensure they support your organization’s compliance with accreditation requirements, and they serve to ensure the independence of your CME activities.

Review Your...	
POLICIES	PROCEDURES / PROCESSES
<ul style="list-style-type: none"> • Written agreements for commercial support • Policies posted on websites • Policy manuals 	<ul style="list-style-type: none"> • CME application forms • Checklists • Training materials

Please contact the ACCME by e-mail at postmaster@accme.org with questions or comments.