I. POLICY STATEMENT
The Continuing Medical Education Committee of Carondelet Health Network shall accept responsibility that the Standards for Commercial Support of the Accreditation Council for Continuing Medical Education (ACCME) and the Arizona Medical Association (ArMA) are met when educational activities are funded in part or in whole by commercial industry support.

II. PURPOSE
To provide guidelines to help prevent commercial influence in the planning, design, and implementation of Continuing Medical Education (CME) activities within the Carondelet Health Network (CHN). Commercial support in the form of an educational grant is welcome. However, topics, course content and faculty are determined without input or advice from any commercial interest.

III. DEFINITIONS
Commercial Support: financial, or in-kind, contributions given by a commercial interest, which is used to pay all or part of the costs of a CME activity. Advertising and exhibit income is not considered commercial support.

Commercial Interest: Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The ACCME does not consider providers of clinical service directly to patients to be commercial interests unless the provider of clinical service is owned, or controlled by an ACCME-defined commercial interest.

CME: Continuing Medical Education
ACCME: Accreditation Council for Continuing Medical Education
ArMA: Arizona Medical Association

IV. ROLES AND RESPONSIBILITIES
Identification of CME needs, determination of educational objectives, and selection of content, faculty, educational methods, and materials will be the responsibility of the CME committee.

All offers of support, coordination of scheduling, obtaining approval for programs and speakers will be handled through CHN’s CME coordinators. Members of the CME committee are not to be contacted directly by commercial representatives, nor are members to contact commercial representatives for the purposes described above. Commercial interests are not allowed to provide CME activities to learners, including distributing self-study materials or arranging electronic access.

Any commercial support must be in the form of an educational grant paid to Carondelet Health Network, which will distribute the funds to cover costs related to the CME activity. The terms, conditions, and purposes of the commercial support will be documented in a written agreement between the commercial supporter and the provider (CHN).
Commercial support may only be sought for activities of more than two hours duration occurring off campus. Copies of all agreements with sponsors must be provided to the CME coordinators, along with copies of checks received.

CME activity proposals dependent on commercial support must be submitted no less than 120 days prior to the event to accommodate the sponsor’s grant review process. Activity proposals submitted less than 120 days out must include alternate funding sources should the grant be declined. No additional funds outside the control of CHN are to be provided to those in a position to control content relative to the specific CME activity. Carondelet must directly pay all honoraria and reimbursement of out-of-pocket expenses.

In accepting honoraria and reimbursement for expenses from Carondelet, the speaker must agree to receive no additional financial reimbursement from a commercial entity.

Meals or other types of food or drink associated with a CME activity may not be directly funded by a commercial interest.

Social events that take place at a CME activity may not compete with or overtake the CME activity.

Generic drug or product names should be used in all presentations and discussions. If trade names are used, all trade names must be identified with their generic counterpart or competing products.

Logos and other advertising from commercial interests are never permitted on any course materials including slides, syllabus materials, and other non-educational interventions.

Rental of exhibit space is not considered commercial support. (See Definitions.) Exhibits are never a condition for the receipt of an educational grant; that is, exhibit space will not be offered free or at a reduced price to commercial supporters. A fee will be charged for securing exhibit space, and the fee will be consistent for any exhibitor regardless of the organization’s involvement in the provision of an educational grant for the CME activity. Exhibit fees and grant support shall remain separate. Commercial exhibits are not allowed in the educational space before, during, or after the CME presentation.

Financial assistance will be acknowledged and disclosed in verbal and/or printed announcements and brochures; however, reference will not be made to any specific product.

The CME coordinator(s) will distribute these guidelines to all activity planners along with the CHN Activity Proposal form.

V. SPECIAL CONSIDERATIONS
None.

VI. REFERENCES

VII. CHN POLICY/PROCEDURE CROSS REFERENCES
Process for Departments to Request CME Credit for Programs
Policy on Conflicts of Interest and their Resolution for CME
X. APPROVAL

<table>
<thead>
<tr>
<th>Committee/Department</th>
<th>Original Approval</th>
<th>1st Review</th>
<th>2nd Review</th>
<th>3rd Review</th>
<th>4th Review</th>
<th>5th Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>CME Committee</td>
<td>1/5/11</td>
<td>7/14/11</td>
<td>7/23/14</td>
<td>7/22/15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CHC MEC</td>
<td></td>
<td>8/28/14</td>
<td>8/27/15</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>