



Dear Content Collaborator:

As follow-up to the Accreditation Council for Continuing Medical Education's release of the *Standards for Commercial Support (SCS) for Continuing Medical Education* in 2004, we are pleased to summarize for you the impact of the new SCS on the policies and procedures of pmiCME, its education partner collaborators, and faculty. In addition, we are happy to announce the availability of numerous resources that will serve to assist all of our collaborators and contributors in making the transition towards application of these new policies and procedures work as smoothly and as seamlessly as possible.

### **Background**

As an ACCME-accredited provider of CME and the education sponsor of certified medical education activities, pmiCME thoroughly evaluated the updated Standards for Commercial Support and convened a Task Force of internal and external experts in education to discuss the Standards and how pmiCME would need to address each of these. The findings of the Task Force resulted in specific policy and procedure recommendations that were reviewed and approved by the pmiCME Medical Advisory Board at the end of April, 2005. These findings are intended to ensure the highest degree of compliance with the new and revised ACCME Standards. pmiCME Accreditation Staff members then developed training programs for all pmiCME and MJC Communications staffs. Training was completed by mid-May 2005. Our next step was to prepare external training for use by education partners, faculty, and commercial supporters.

To this end, please note that we have created the *pmiCME Education Partner Training Module*, which is now posted on the pmiCME web site (<http://www.pmicme.org/pmi/partners.htm>). The training module contains a history of the updated SCS and extensive details on the new or revised pmiCME policies and procedures. Revised templates and the revised Education Partner Guide are also now available on our website.

What follows is a *brief summary* of the key changes in pmiCME policies, procedures, and requirements as they relate to specific standards and which will serve as an introduction to the content of the online Training Module. Please note that this training module is for any education partner who contracts with pmiCME. Completion of this training is required before the planning and production of any certified CME content.

### **Updated ACCME Standards for Commercial Support and Corresponding pmiCME Policies and Procedures**

#### *Standard 1: Independence From Commercial Interests*

This standard requires that pmiCME be able to document that all decisions regarding an educational activity were made free from influence by a commercial interest. The criterion that resulted in the creation of totally new policies and procedures was that which related to "selection of all persons and organizations in the position to control content" and, of all persons and organizations, the education partner (EP) and their staffs. To meet this standard, pmiCME created a process for identifying EP collaborators. This process involves the following elements for interested EPs:

- Completion of the *Education Partner Updated Standards for Commercial Support Training Module* that is referenced above

- Fulfillment of EP Collaborator Criteria
- Inclusion in the pmiCME List of EP Collaborators on the pmiCME web site, based on EP submission of attestations regarding collaborator criteria

#### *Standard 2: Personal Financial Disclosure*

ACCME now requires that anyone in the position to control content, including content staff of pmiCME, the content staff of the EP, or faculty, provide Personal Financial Disclosure to pmiCME Accreditation staff. This information will then be used by pmiCME to manage the resolution of conflict of interest.

The new policies and procedures on disclosure are in place and have been effective since 2005.

Content submissions from faculty with reported financial relationships with commercial interests will automatically be flagged and pmiCME will work with the respective faculty and EP to resolve conflicts of interest that result from these disclosures. As required by the ACCME, faculty who do not provide financial disclosure cannot serve in any capacity as part of a pmiCME-certified activity.

#### *Standard 3: Appropriate Use of Commercial Support*

##### **Honoraria Policy**

In accordance with the updated standards, pmiCME has developed a policy that provides guidance to pmiCME staff and education partners to ensure compliance governing distribution of honoraria for faculty and/or authors of a CME activity. pmiCME has determined that faculty honoraria will be based on any one of the following parameters:

- Faculty are established experts in fields relevant to topic areas of medicine or surgery identified by pmiCME
- Faculty have published works on field relevant to topic areas of medicine or surgery identified by pmiCME
- Faculty are involved in research in specialty areas
- Other parameters as defined by pmiCME policy
- Honoraria amounts are defined by pmiCME policy

##### **Preliminary and Reconciled budgets**

pmiCME must be able to produce accurate documentation detailing the receipt and expenditure of commercial support to the ACCME. As a result, both Preliminary and Reconciled budgets must detail sources of income and expenses. In addition, expenses and must be sufficiently detailed so that no line item exceeds 20% of total expenses. You are not required to use the templates, but must adhere to the new standard when submitting budgets.

#### *Standard 4: Appropriate Management of Commercial Promotion*

pmiCME has revised its policies and procedures to ensure compliance with the updated Standards as they relate to commercial promotion and exhibits.

#### *Standard 5: Content Without Commercial Bias*

This standard is addressed in pmiCME policies and procedures regarding content peer review by external topic experts and content validation by the external topic experts and pmiCME clinical editorial staff. pmiCME works with collaborating EPs and faculty to resolve such conflicts to ensure that the content presented is free of commercial bias and that it promotes improvements or quality in health care and not a specific proprietary business interest of a commercial interest.

*Standard 6: Disclosure Relevant to Potential Commercial Bias*

This standard is addressed in pmiCME policies and procedures regarding faculty and their spouse or partner's financial relationships with commercial interests. All disclosures will be provided in writing in course materials distributed to potential activity participants.

**Summary**

We now invite you to access the *pmiCME Education Partner Training Module* (<http://www.pmiCME.org>). We encourage that the Module be completed by each member of your organization working in support of a pmiCME-sponsored activity. If you have any questions about the Module or any of the updated pmiCME policies and procedures, please contact your respective Project Leader.

As always, thank you for your participation and support. We look forward to your working with you and all the members of your team as we implement the updated ACCME Standards for Commercial Support. We very much value your feedback and suggestions over the coming months as we refine the relevant pmiCME policies and procedures.

On behalf of pmiCME, thank you for your interest and we look forward to working with you now and in the future.

Cordially,

A handwritten signature in black ink that reads "Marissa Seligman, PharmD". The signature is written in a cursive, flowing style.

Marissa Seligman, PharmD  
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Sr. Vice President, pmiCME