

Frequently Asked Questions on Accreditation

Co-Development Relationships

1) How is co-development different from sponsorship?

Sponsorship is a term that refers to one organization providing funding to support the development of an accredited activity or event. Co-development is a term that refers to two or more organizations intentionally pooling their collective expertise to plan an event. Co-development may or may not include the provision of funding (i.e. sponsorship) as a component of the development of an event.

In a co-development relationship the physician organization or accredited CPD provider must assume control over all aspects of the planning process (needs assessment, learning objectives, content, evaluation, speaker selection) as if they were planning the event independently.

If the co-development relationship is with a non-physician organization (for example a pharmaceutical company) there are several additional important restrictions. Members of the pharmaceutical company cannot participate as members of the planning committee that determines the content, speakers, educational format etc. Non-physician organizations can contribute their expertise to needs assessment strategies, the evaluation strategies and logistical support for the activity or event.

2) With the understanding that in a co-development relationship an industry representative cannot sit on the planning committee, can the industry representative recommend a physician to sit on the planning committee with the approval of the physician organization's representative?

The membership of the planning committee is the responsibility of the physician organization. The co-developing organization can make recommendations to the physician organization regarding the planning committee membership, but the decisions of who is selected to participate in the planning committee must be the sole responsibility of the physician organization or accredited CPD provider.

3) How far along in the program planning process can a co-development relationship begin?

For an accredited CPD provider or a physician organization to assume responsibility and control all aspects of the planning process the co-development process should begin as early in the process as possible. Although it is ethically preferable for the identification of a need to develop a program to originate with the physician organization or accredited CPD provider, it is ethically permissible for industry to approach a physician organization or accredited CPD provider based on a defined needs assessment. In this circumstance the

physician organization must validate the relevance of the needs assessment and determine that an educational response is appropriate to meet the needs of their target audience.

- 4) When events are co-developed with a non-physician organization, all expenses related to the speakers such as honoraria are paid by the physician organization. Can all other expenses (food, AV, room rental) be billed directly to the non-physician organization?**

The standards established by the CPD Accreditation Committee separates the responsibility for speaker expenses from other logistical expenses. All physician organizations are expected to pay the travel costs and honoraria for speakers. The responsibility to pay other logistical expenses such as food, AV, room rentals etc can be delegated to a third party as long as the third party has been approved and vetted by the physician organization responsible for the program. Currently, it is ethically permissible for any organization (including industry) to serve as a third party and be delegated to pay these types of expenses.

- 5) How can industry's participation in co-developed event be acknowledged?**

All co-developed programs or accredited activities within an approved group learning event should be acknowledged within program brochures or materials. It is ethically permissible to include an acknowledgement of the co-developed activity within the outline of the program. However, it is ethically preferable to acknowledge any co-developed event or activity on program materials that are separate from the outline of educational activities. All co-developed relationships should be acknowledged using the following standard statement. "This [program, workshop or seminar] was co-developed with (name of the organization) and was planned to achieve scientific integrity, objectivity and balance".

Tagging

- 6) Does the elimination of tagging only apply to a pharmaceutical company or medical device company, or does it relate to any instance where funding changes hands? For example, sessions within an annual conference scientific program that are planned by an affiliate are tagged (e.g., "Supported by the X organization.") Can these sessions continue to be tagged provided that no funds change hands/are transferred?**

The elimination of sponsors tagging is not restricted to members of the pharmaceutical industry, but to any sponsor including not-for-profit organizations. Any organization that provides funding is considered a sponsor and would be under the same restrictions as for-profit industry organizations.

If funding has not been provided by an organization, then they are by definition not a sponsor of the event. In the setting where organizations are providing "in-kind" resources other than funding, these organizations are more appropriately referred to as contributors or collaborators. However, the provision of an in-kind contribution does not allow the names of organization to be tagged to specific components, but acknowledged in general as a contributor or collaborator of the entire event.

7) If an organization has already signed a contract with sponsors for 2010 and tagging is allowed within this contract, does the contract need to be renegotiated?

The Royal College is aware that several Accredited CPD Providers have established contractual relationships with industry partners. This was one of the reasons the Royal College provided 2 years notice before establishing a policy related to the elimination of tagging of educational components of an approved group learning event. Although the ethical standard to eliminate the tagging of educational activities within an approved group learning event will come into effect on January 1, 2010, the Royal College understands that there will still be the need for a transition period after January 1st, 2010 to implement the changes. Therefore, if you are contractually committed to the practice of tagging for your upcoming 2010 program, the Royal College would not require you to re-negotiate your contract. However, the development of subsequent programs must demonstrate how sponsorship funding, separate from any co-development process was not linked to a specific educational component of an approved group learning event. We would also expect at the time of your next application to maintain your status as an accredited CPD provider, that any contracts specifying tagging were signed prior to 2010.

8) Are there any options for sponsorship funding to be linked to specific educational activities within an approved event?

There are at least 4 options to consider

Option 1: You can continue to 'tag' educational sessions if these are not part of the accredited activities. Tagging is clearly permissible if the session is unaccredited. Unaccredited sessions must be clearly defined as unaccredited and occur at times that do not compete with other accredited activities. Examples could include sessions developed to discuss a specific product.

Option 2: Co-develop the session and acknowledge the relationship using the following standard statement: "This [program, workshop or seminar] was co-developed with (name of the organization) and was planned to achieve scientific integrity, objectivity and balance".

Option 3: Funding for sessions that are accredited and not co-development can only be acknowledged as part of the general sponsorship page in the syllabus of an annual meeting. For these activities the sponsoring organization cannot be listed with the session in the program's outline

Option 4: Develop a satellite symposium. Satellite symposium are by definition unaccredited learning activities for which funding can be received and 'tagged' to such symposia, but not included in the educational program.

9) Can an award be presented that is named after industry supporters at a President's Gala?

This would be ethically permissible as the activity is an award which is not part of the planning of an accredited group learning activity.

- 10) If an Internet café is supported by a company and the internet kiosks are offered inside the exhibit hall only within the sponsor's booth (an unaccredited venue), is tagging permissible?**

Tagging is ethically permissible for all non-educational activities. This is a service you are providing for your members. It is ethically preferable for these services to be located in the exhibit hall and therefore separated from the space where the educational activities are occurring.

- 11) Can sponsorship be tagged to a certain type of presentation (e.g., all the symposia or all of the workshops) but not to one or more individual presentations within that type?**

Please see the four options (in Question 8) that accredited CPD organizations can consider related to the funding of a specific workshop or seminar.

- 12) Can a one-page promotional item be distributed for satellite symposia at the registration booth?**

If the accredited CPD provider or organization was involved in the development of the satellite symposia as an unaccredited group learning event then it would be ethically permissible to inform registrants of this event. If the organization has nothing to do with the planning or development of this unaccredited group learning event then you are under no obligation to provide such information to registrants.

- 13) If purely social events can be tagged, such as a lunch, can there be a sponsor's sign in the room where lunch is being served?**

Sponsorship of non-educational events such as lunches within an accredited CPD event is ethically permissible. Therefore a sign of the sponsor within the room is certainly permissible. If business meetings or other information sessions occur during lunch, it must be clear to all participants that these activities are not part of the educational activities for which credit is applied.

Sponsorship Recognition:

- 14) Can higher level sponsors (such as platinum) be specifically thanked apart from the other sponsors in a purely social event within the conference?**

This is ethically permissible. The other sponsors are appropriately thanked in the conference materials. These differences should be specified within the prospectus so that the conditions of acknowledgement are clear for each level of sponsorship.

- 15) Can there be verbal recognition of the sponsors during a social event?**

Verbal or written recognition of sponsors of a social event is ethically permissible. It is important to ensure there are no accredited educational components to the social event.

- 16) Can sponsorship recognition on a website include hyperlinks to the main pages of the sponsors' websites?**

This is ethically permissible. The only restrictions within the CMA Guidelines related to physicians and industry deals with e-CPD where the guidelines state "There should be no

direct links to an industry or product website on any web page which contains eCPD material.”

17) Can a plaque be presented recognizing partnership to sponsors in a social event or during the trade show without any educational components?

These practices are ethically permissible assuming that there are no educational components included within these types of social events.

18) Can a company pay for the printing, publishing, and distribution of abstracts as a sponsorship opportunity and be acknowledged for doing so?

This is ethically permissible. Payment for printing, publishing, and distribution costs of abstracts to physicians is a service provided to members. Such practices do not have any influence on aspects of the planning process including the selection of the content or speakers that formed the basis of the abstracts.

Sponsorship Funding Questions

19) Can a sponsor fund a specific day within a multi-day conference?

Many conferences are planned to have multiple streams for different target audiences. Each stream functions like a “meeting within a meeting”. Although in the strictest sense acknowledging the receipt of an unrestricted educational grant for one day within a multi-day meeting is a form of tagging, this is ethically permissible because if each of these meetings were separated into one day accredited activities, acknowledging the funding source would be deemed appropriate. It is ethically preferable for the acknowledgement of the funding for a day within a multi-day meeting should not be included within the educational outline of the program.

20) If a program is developed under Section 2 of the MOC Program, can industry representatives distribute invitations, help with the logistics, and attend the session, without being involved during the session per se?

Since Section 2 is for unaccredited group learning activities, there are no restrictions on industry involvement in the development of these programs, nor in their attendance at these events.

21) How can attending unaccredited group learning events contribute to the development of personal learning projects in Section 4?

Simply attending an unaccredited group event does not equate with completing a personal learning project that can be claimed in Section 4. However, attending an unaccredited group event could be the stimulus for the development of a personal learning project that may include some or most of the aspects of attending the event. For example, an individual attends a 4 hour unaccredited event and as a result created a question that they were stimulated to pursue because of their participation. Although 1 hour of the unaccredited event was relevant to the question that was raised two additional hours were spent looking up other resources or discussing the question with colleagues. The final step is to record the question, stimulus, resources used and the outcome(s) identified in MAINPORT – claiming 3 hours (or 3 credits) for completing this learning project.

Defining a Physician Organization:

22) Can three or more physicians from a faculty of medicine create a program and be considered a physician organization?

Three or more individuals cannot be equated with a physician organization, because physician organizations have "a formal governance structure, accountable to and serving, among others, its specialist physician members." Since a small group of physicians often have a good idea for the development of a group learning activity, the most appropriate response is for these individuals to work with a physician organization or an accredited CPD provider to develop these events. Educational events developed independently by a group of doctors cannot be included within Section 1.

23) Does a physician organization need to have a membership base?

Almost invariably, a physician organization has a membership base that defines its accountability to the profession. Other organizations are accountable to the government, the public or share holders. Accountability to the profession is a key element in what defines a physician organization.

General Questions

24) Where should learning objectives be included within the conference materials?

General learning objectives for a conference should be included within preliminary and final program materials. Learning objectives for individual sessions should ideally be included within the final program but as long as they are distributed in writing prior to the session to facilitate their ability to determine the relevance of the session for their practice and to determine if the learning objectives were achieved in the evaluation of the session, this is acceptable.

25) Can educational activities for other health professionals be included within an accredited group learning event for physicians?

There are many examples of Accredited CPD Providers who include several other health professions as members of their target audience. Learning activities that are targeted at a health care team or at physicians and other health professions must meet all of the educational and ethical standards expected for Section 1. If a specific event is planned only for other health professionals (for example nurses) it can be planned to achieve the same standards for physicians or the standards developed by that health profession where applicable. Regardless these types of activities can be included within an accredited group learning event for physicians.

26) What strategies would the Royal College recommend to resolve identified conflicts of interest?

When any conflict of interest is identified there must be a process to resolve a declared conflict of interest that in the judgment of the Accredited CPD Provider is of significant concern (for example where the conflict and the content of the topic make balance and the minimization of bias very difficult).

There are a number of strategies that can be considered to resolve such declared conflicts:

- a) The speaker could be required to alter the focus of the talk to limit the areas where conflict of interest is significant.
- b) The topic selected could be changed but use the same speaker.
- c) The planning committee could ask for a peer review of the content to ensure that the principles of scientific integrity, objectivity and balance have been respected.
- d) Eliminating the topic and speaker. This is a very uncommon occurrence and is not a preferable route to resolve a significant conflict of interest.