

WEILL CORNELL MEDICINE COMMERCIAL SUPPORT POLICY

The Weill Cornell Continuing Medical Education (CME) Committee acknowledges that industry grants for CME activities may be of value in supporting all or part of the costs of certain CME activities, provided that these activities are properly vetted and found to be in compliance with Weill Cornell and ACCME Standards for Integrity and Independence in Accredited Continuing Education. While it is not our intention to interfere with our faculty's ability to provide CME, we must ensure that financial support does not infiltrate the educational process and cause the content of the activity to be inappropriately biased. Thus, we have developed the following guidelines related to commercial support. These guidelines are subject to revision, and the CME committee reserves the right to deny approval to CME activities and/or their industry support even if they are in compliance with the criteria listed below and/or with ACCME guidelines:

1. All Weill Cornell CME activities must comply with the Accreditation Council for Continuing Medical Education Standards for Integrity and Independence in Accredited Continuing Education. These are available online at www.accme.org. Commercial support is not permitted for regularly scheduled series (RSS's) (e.g., Grand Rounds, Clinical Case Conferences).
2. All industry/commercial support must be approved in advance by the Weill Cornell CME Committee. All industry support must be disclosed to the CME Committee on the CME Application, due at least three months before a scheduled activity. CME credit approval and commercial support cannot be approved retroactively. The CME Committee will consider the financial relationships of a course director, as well as those of the planning committee and course faculty, in its decision to approve requests for commercial support. As such, faculty disclosure forms for all course directors, planners, and course faculty must be included in any request for industry support.
3. Unless approved by the CME committee, multiple commercial supporters must be included for activities for which commercial support is sought.
4. The amount of Industry support cannot exceed estimated expenses for the activity as outlined in the budget.
5. An Independent Clinical Reviewer (ICR) is required under the following circumstances:
 - a. If a course director has any commercial or industry relationships as disclosed on the Weill Cornell full disclosure form.
 - b. If there is only one commercial supporter of an activity (as indicated above, this is strongly discouraged), or
 - c. If the Committee, for any reason, feels it is required.
6. All Weill Cornell CME activities receiving commercial support must obtain signed letters of agreement (LOA).
 - a. LOA's must be signed by all parties (accredited provider, commercial supporter, and any educational partner) prior to the CME activity. Commercial support cannot be acknowledged in activity promotional materials until the LOA is signed. Commercial support cannot be acknowledged in on-site activity materials (e.g., program book) until the LOA is signed. If an LOA is not signed prior to the CME activity, any funds have already been received, those funds must be returned to the commercial supporter.
 - b. All industry grants must be made to a Weill Cornell departmental account and all expenses (including honoraria and travel) must be paid via a Weill Cornell departmental

account.

- c. The Weill Cornell LOA must be used for all industry support. Any alternative document must be reviewed and approved by the CME Committee prior to execution.
 - 7. No faculty honoraria or expenses can be paid for directly by an industry supporter. Similarly, CME activities cannot be held on-site at a facility owned by a commercial supporter.
 - 8. Employees and owners of commercial companies are not permitted to speak at Weill Cornell CME activities.
 - 9. Commercial Support Fees are determined by the CME Committee and based upon a percentage of grants received. If the commercial support fee(s) presents a hardship, the course director may submit a written request for fee consideration which will be reviewed by the Weill Cornell CME Committee.
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Additional requirements: Regularly Scheduled Series (RSS's) (e.g., Grand Rounds, Clinical Case Conferences)

- 10. Commercial Support is not permitted for Regularly Scheduled Series. In rare circumstances, a course director may petition the CME Committee for a one-time exception for a specific presentation. If a planned lecture is in any way to be supported by industry funds or any for-profit entity, the course director must submit a written request for permission to the CME Office no later than two weeks before the date of the activity.

For each request, the course director must submit:

- a) a cover letter outlining the rationale for commercial support for this session
- b) a proposed Letter of Agreement for Commercial Support
- c) the Speaker's Full Disclosure Form
- d) the CME Information Page for the particular session to be supported

Such requests will receive an expedited review insofar as the CME office is able to do so.