

## Provider Self-Assessment on Readiness to Demonstrate Compliance with ACCME's Updated Standards for Commercial Support

Organizational self-assessment is an important part of the improvement process of ACCME accredited providers. The self-study model on which the ACCME's accreditation process is based relies heavily on internal self-evaluations that allow providers to pinpoint needs of their own CME programs and allocate resources to address those specific needs. Assessing readiness to demonstrate compliance with ACCME's Updated Standards for Commercial Support can be a part of providers' self-assessment process.

This example of a self-assessment is designed to help providers link current practices with ACCME expectations. When completing this self-assessment worksheet, please reference ACCME's Updated Standards for Commercial Support.

Providers are **NOT** required or expected to use this self-assessment. It is a tool developed for ACCME's Accreditation Workshops which is being shared with Providers.

### Independence

According to SCS Element 1.1: When planning a CME activity, the provider must make the following decisions free of the control of a commercial interest:

- a. Identification of needs
  - b. Determination of education objectives
  - c. Selection and presentation of content
  - d. Selection of all persons and organizations that will be in a position to control the content
  - e. Selection of educational methods
  - f. Evaluation of the activity
1. List the activities your organization presents (annual meetings, regularly scheduled conferences, internet CME, etc) and describe how you conduct a-f above.  
*Are there any points in your processes in which a commercial interest has the opportunity to impact your ability to make decisions free of its control? If yes, how do you manage this situation? Could you improve your process(es)?*
  2. When developing your organization's accreditation self study report, what types of materials and/or description of your planning process could you provide (based on the answers to question #1) to demonstrate that your organization planned your activities free of the control of commercial interests?
  3. *How do you select those in control of the content? Are there criteria for faculty/planners/authors?*
  4. *What are the sources of your needs assessment?*
  5. *Are there guidelines for faculty to use when developing presentations?*
  6. *Is there a content review process or criteria for making clinical recommendations?*

### Resolution of Conflict of Interest

According to SCS Standard 2: When planning a CME activity, the provider needs to ensure that it has implemented a mechanism to identify and resolve personal conflicts of interest prior to the CME activity.

7. What procedure(s) do you CURRENTLY have in place that you could use to show that everyone who is in a position to control the content has disclosed all relevant financial relationships to you, as the accredited provider?

8. Refer to your answer to question #1. Identify points in your current planning and implementation processes that help ensure the activity is free of commercial bias - that enable you to manage and resolve conflicts of interest (i.e., points).
9. When developing your organization's self study report, what types of materials and/or description could you provide to demonstrate that your organization have resolved conflicts of interest (based on answer to question #8)?

### **Appropriate Use of Commercial Support**

According to SCS Standard 3: When planning a CME activity, the provider needs to ensure that funds from commercial supporters are managed appropriately.

10. What processes/procedures/mechanisms does your organization have in place to help ensure that it, as the accredited provider, remains in control and makes all decisions regarding the use of commercial support? Refer to your response to question #1 for mechanisms that you may not have previously identified.
11. Some ACCME accredited providers have had difficulty demonstrating compliance with management of commercial support as it relates to maintaining ALL written agreements, signed by the accredited provider and the commercial supporter. What process does your organization have in place to ensure that all letters of agreement are signed by the appropriate parties, collected, and maintained?
12. Does your CME program have policies and procedures on honoraria and reimbursement? If not, where could you start? Do other departments in your institution have policies and procedures? Do some of your colleagues have these policies and procedures?
13. When developing your organization's accreditation self study report, what material could you provide to demonstrate that you appropriately manage commercial support? See your responses to questions #1 and 10.

### **Managing Promotion**

According to SCS Standard 4: When planning a CME activity, providers need to ensure that promotion is separated from education.

14. What process(es) does your organization have in place to ensure that exhibits or advertisements do not influence or interfere with the presentation of CME activities? If your organization does not have a formal procedure, what is your customary business practice?
15. What procedures has your organization used to make sure that product-promotion or product-specific advertisement does not occur in or during CME activities?
  - a. *Do you have guidelines for industry representatives that attend activities?*
  - b. *Do you have training materials for training sessions for industry representatives?*
  - c. *Do you have a review process for advertisements in print or internet materials?*
16. When developing your self study report, what material could you provide to demonstrate your organization separates promotion from education?

### **Content without Commercial Bias**

According to SCS Standard 5: When planning a CME activity, providers need to ensure that the content promotes improvement and quality in healthcare and that it gives a balanced view of therapeutic options.

17. In planning a CME activity, how does your organization ensure that the content of the activity promotes improvements or quality in healthcare and not a commercial interest? Refer to your answers to questions #1 and 6 for mechanisms you may not have previously identified.
18. What process(es) does your organization have in place to ensure that presentations give a balanced view of therapeutic options and use generic names whenever possible?
  - a. *Do you provide guidelines to your speakers and authors?*
  - b. *Do you provide training to your speakers and authors?*
  - c. *Do you have a content review (pre-activity) or evaluation (post-activity) process?*

19. When developing your organization's self study report, what material could you provide to demonstrate that the content and format of your organization's CME activities are without commercial bias?

### **Disclosure**

According to SCS Standard 6: The provider needs to ensure that the appropriate disclosures to the learners occur prior to the beginning of the CME activity.

20. What is the required information that needs to be disclosed to learners? *HINT: Review Element 6.1.*
21. For each activity type your organization provides, review an example of how disclosure was made known to the learners. Does each example meet/demonstrate compliance with Element 6.1?
22. When developing your organization's self study report, what types of materials could you provide to demonstrate your compliance with ACCME's policies on disclosure?