



POLICY ON SPONSORSHIP

from Commercial Sources of University of Toronto Accredited Continuing Professional Development Activities

To be used in partnership agreements and other support of Continuing Professional Development Activities

GUIDING PRINCIPLES:

- As a general guiding principle, [Continuing Professional Development \(CPD\)](#) must be free of commercial influence, based on best scientific evidence and focused on improving the knowledge, skills, attitudes and behaviour of learners.
- [CPD providers](#) must ensure that teachers deliver current, objective, and scientifically rigorous content.
- [CPD program planners](#) must avoid promoting, as a member of their profession, any service or product for personal gain.
- [Planning committee members](#) will oversee the needs assessment, program development, compliance with disclosure rules, and the oversight of the activity in general.
- [CPD providers](#) should resist any influence or interference that could undermine their professional integrity.

CONTENTS

Introduction & Background.....	3
Separating Education from Marketing.....	5
Unbiased Presentation of Content.....	7
Direction of Funds.....	7
Disclosures.....	8
Off-Label Use.....	9
Commercial Displays and Promotional Materials.....	9
Satellite Symposia	9
Social Events.....	10
Registration.....	10
Gifts and Payment to Teachers.....	11
Acknowledgements.....	12
Use of University of Toronto Name and Logo.....	13
Glossary of Terms.....	14

*Web links updated April 6, 2016.

POLICY ON SPONSORSHIP

Introduction & Background

This document outlines the Faculty of Medicine's policies pertaining to the support of Continuing Professional Development activities or resources by commercial sponsors.¹ Such activities or resources include but are not restricted to courses, seminars, conferences, workshops, journal clubs, hospital approved rounds, lectures, online courses, and the production of learning resources, e.g. CD-ROM or videotape, designed for participation or use by health professional learners.

Commercial interests will not influence:

1. Identification of learning needs
2. Development of educational objectives
3. Selection and presentation of content, including speakers
4. Selection of all persons and organizations that will control the content of and registration for the CPD activity
5. Selection of educational methods
6. Evaluation of CPD activity
7. Learners

This policy applies to any University of Toronto accredited CPD event and pertains to food, exhibits, entertainment and satellite symposia occurring at any such event.

This policy is intended for use as a component of a larger suite of materials and guidelines to assist planners and developers of CPD activities and materials at the University of Toronto.

See www.cpd.utoronto.ca for further details.

In addition to the official policies stated herein, individuals are advised to review any relevant regulations put forth by their own department, hospital, or institution.

This policy is in compliance with the accreditation criteria of The College of Family Physicians of Canada and the Royal College of Physicians and Surgeons of Canada.

¹ For example, pharmaceutical companies, instrument and device manufacturers, and service providers.

POLICY ON SPONSORSHIP

Introduction & Background

The following documents have been employed in the preparation of these statements and form the basis for this policy.

- 1) University of Toronto Faculty of Medicine - Report of the Task Force on Relations with Industry and the Private Sector (January 2011)
<http://medicine.utoronto.ca/sites/default/files/TRIPS%20Report%202011.pdf>
- 2) Canadian Medical Association CMA Policy - Guidelines for Physicians in Interactions with Industry (2007)
<http://policybase.cma.ca/dbtw-wpd/Policypdf/PD08-01.pdf>
- 3) CMA Policy Canadian Medical Association Code of Ethics (updated 2004)
<http://policybase.cma.ca/dbtw-wpd/PolicyPDF/PD04-06.pdf>
- 4) Accreditation Council for Continuing Medical Education (ACCME) Standards for Commercial Support, 2004, 2006, 2007, 2015
<http://www.accme.org/requirements/accreditation-requirements-cme-providers/standards-for-commercial-support>
- 5) The Association of Faculties of Medicine of Canada (AFMC) Statement on Industry Funding of Medical Education, 2008, 2011. Commercial Support and Disclosure
http://www.cfms.org/attachments/article/163/cfms_industry_funding_working_group_paper.pdf
- 6) Industry Funding of Medical Education: Report of an AAMC Task Force (PDF) June 2008
<http://www.ucsfcmecme.com/news/IndustryFundingMedicalEducation.pdf>
- 7) AAMC 2010 Report of the Task Force on Financial Conflicts of Interest in Clinical Care
https://www.aamc.org/initiatives/research/coi/75290/financial_conflicts_of_interest_in_academic_medicine1.html

POLICY ON SPONSORSHIP

Separating Education from Marketing

Health care professionals must maintain professional autonomy and independence in relations with industry.

For Continuing Professional Development and accredited CPD events and programs, content should be aimed to promote education among its varied learners. Accredited events and programs must be fair, balanced and free of commercial bias.

Acceptable commercial support must be distinct from activities intended to promote the marketing of a particular product.

Accredited events and programs may be subject to content review by an education expert and/or site audits (attend and observe).

a) Needs Assessment

Educational events must be planned to address the educational needs of the audience, whether that be practising faculty, students, trainees or health care providers. Faculty planners are responsible for the content, organization and financial arrangements of these events, without influence from sponsors.

A comprehensive needs assessment should be conducted. CPD planners are strongly encouraged to use multiple means of needs assessment to determine the perceived, misperceived and unperceived needs of their learners. For example:

- Surveys
- Expert opinion
- Evaluation results / Reports from other educational activities
- Informal discussions / interviews
- Focus groups
- Consensus conferences
- Epidemiological data
- New advances in clinical treatments
- Thematic analysis of peer reviewed journals

The needs assessment should occur prior to any negotiation with potential commercial sponsors.

For more information on how to conduct a comprehensive needs assessment, please refer to the “CPD Quick Tips” document on needs assessment available at the link below:

www.cpd.utoronto.ca/quicktips-docs/05-How-to-Conduct-a-Needs-Assesment.pdf

POLICY ON SPONSORSHIP

Separating Education from Marketing

b) Course Content, Objectives and Evaluation

Invitations to participate in planning for CPD activities must emanate from the CPD provider (course director), not from commercial sponsors.

Course directors, planners and faculty must ensure programs are fair and balanced. Emphasis should be placed on current knowledge, best practices and quality improvement.

Course planners must ensure innovative learning methods are applied and decisions are made free of the control of commercial interest.

Course topics and learning objectives must be determined by the planning committee and, where appropriate, include subject areas that reflect current practice. Activities should be linked to analyses of learner gaps and other needs. Learning objectives should be clearly stated at the outset.²

Evaluation mechanisms must contain questions that serve to inquire whether learners perceived commercial bias in the materials received from the teacher or author.³ A summary of evaluation forms must be made available to Continuing Professional Development at the conclusion of each accredited program.

c) Selection of Topics and Speakers

As a condition of receiving funds or services, a CPD provider must not be required to accept advice or services concerning the selection of teachers, authors, participants or other education matters including content, from a commercial sponsor.

The selection of topics, speakers, and course materials are entirely the responsibility of the course planner/s. All speakers must be identified and invited by the course director and planning committee. The choice of speakers, subjects of presentations, travel arrangements, registration, expenses and honoraria must all be arranged and paid through event planners, and not through commercial sponsors or their agents.

² For example, include a statement to the effect of, "At the conclusion of this activity, participants should be able to:" followed by a list of previously determined objectives.

³ For example, "Is this event free from undue commercial influence? Is the speaker presentation balanced and unbiased?"

POLICY ON SPONSORSHIP

Separating Education from Marketing

d) Enduring Materials

Continuing Professional Development does not accredit enduring materials. Enduring materials are defined as any printed, recorded or computer-based CPD activity that may be used over time, at various locations. This includes learning materials such as a monograph, self-assessment quiz or any other item meant to provide educational information to learners.

Unbiased Presentation of Content

Presentations must give a balanced view of all relevant therapeutic options available. In those circumstances where there is only one product or drug, a fair assessment must be presented to learners. The use of generic names is required. In the event trade names are employed, reference to multiple trade names representing several companies is preferable to referencing a single trade name from a single company.

It is prohibited to use the name or institutional logo of the University of Toronto in a manner that constitutes promotion of a commercial product (e.g. presentation slides).

Direction of Funds

All funds from a commercial source must be in the form of an unrestricted educational grant payable to the institution or organization planning the CPD activity (e.g. University of Toronto, the course director's hospital or similar academic unit). It is acceptable to designate an unrestricted educational grant to a specific CPD event. Subsidies must not be accepted if specifically designated for hospitality purposes.

Events should have sponsorship from multiple sources to avoid the perception of ownership that a single commercial source may imply. Funds should be held centrally at an institution (hospital, university department or division). Funds should not be held by any one individual.

Audit mechanisms should be established to assure compliance with university and national standards. Financial statements for each sponsored event should be available for audit by the departments, institutions, Continuing Professional Development and commercial sponsors.

POLICY ON SPONSORSHIP

Disclosures

Disclosure of commercial affiliations, sponsorships, honoraria, monetary support, contract research, and other potential conflicts of interest must be made to the participants in a CPD activity by University of Toronto faculty, planning committee members and visiting speakers.⁴

Course directors are responsible for conveying to learners in writing any potential conflicts relevant to the topic area of the presentation declared by their course faculty and/or any funding received by the course for their support. Disclosures should be made in the course syllabus or handouts, and must be included as the second slide in the speakers' presentations.

If there are no handouts or slides, a summary of declared relationships should be distributed to participants.

Faculty members must fully disclose income received from participation in industry advisory boards, speakers' bureaus or consultation to industry. Faculty disclosures should cover relevant relationships for a period of five years prior to the course.

Where a faculty member for a CPD activity requires disclosure, state:

- The full name of the individual/s
- The role of the individual/s
- The name of the commercial entity with which the individual/s has the relationship
- The nature of the relationship between the individual/s and the commercial entity

Where a faculty member has nothing to disclose, state:

- The full name of the individual/s
- The phrase, "has no actual or potential conflict of interest in relation to this program."
For further information and examples pertaining to appropriate disclosures, please see:
www.cpd.utoronto.ca/brochures/facultyDisclosureDeclarationForm.pdf

⁴ This includes, for example, stock options, patents, research grants, etc.

POLICY ON SPONSORSHIP

Off-Label Use

Information claims or recommendations for use of a drug that differ in any way from the official product monograph(s) must be declared verbally as well as in the printed materials.

Commercial Displays and Promotional Materials

Commercial displays and materials must be in a separate room from educational activities.

A statement from the Planning Committee to potential exhibitors and/or commercial sponsors must indicate that gift items cannot be distributed. This includes small items bearing the exhibitor's name and/or logo to the participants in the venue where the CPD activity is occurring.

When commercial exhibits are included in the program, they must not influence the planning or interfere with the presentation of the educational activity. Exhibitors and/or sponsors may not use the University of Toronto name or logo unless specifically approved by Continuing Professional Development.

Satellite Symposia

Many satellite symposia are held in proximity (either spatially or temporally) to conferences and meetings. These are separate meetings, frequently produced by commercial interests, often without the restrictions of commercial sponsorship policies and guidelines. Registrants may perceive such programs as integral to the accredited program and be unaware of commercial bias. Thus, conference planners must take care to ensure that:

- 1) Registrants at the program are aware that such satellite symposia are not accredited by the University of Toronto;
- 2) Such activities are promoted (marketed or 'branded') in a way which clearly identifies the satellite activity as distinct from the accredited program;
- 3) The satellite symposia are located in an area separate from the University of Toronto accredited program, and;
- 4) The satellite symposia do not run concurrently with the accredited program.

POLICY ON SPONSORSHIP

Social Events

Commercial sponsors may not directly subsidize or name hospitality and other arrangements for faculty, planning committees, registrants or guests. Facilities, catering and other activities should be in keeping with arrangements made without commercial sponsorship. These activities must not be in the control of, or managed by, commercial sponsors.

Registration

a) Registration Fees

Registration for accredited programs must be through the university or faculty member planners and not through an industry representative.⁵

A registration fee is generally required from all non-teaching participants, since it is preferable that registrants bear some responsibility for the program in order to reduce perceived or real influence on learning. Exceptions to this general rule include rounds, faculty development activities, and research-oriented programs or events. A commercial sponsor may not cover the entire cost of an accredited program. Commercially sponsored scholarships and/or bursaries may be awarded on an as needed basis.

Advice for current registration fee rates may be obtained from Continuing Professional Development. Instances in which there is a demonstrable gap in care, or in which a health provider group requires lower-fee inducements to participate in CPD may be considered on an individual, case-by-case basis. Reduced or waived fees for postgraduate students are at the discretion of the Course Director.

b) Participant Lists

Explicit consent from participants must be obtained before distribution of participant lists to either commercial sponsors or attendees.

⁵ A medical education company hired by a commercial sponsor is considered an industry representative.

POLICY ON SPONSORSHIP

Registration

c) Payments to Registrants

Commercial sponsors may NOT provide or subsidize travel, lodging, honoraria, or personal expenses directly to practicing health professional attendees or their guests.

In the case of students, residents or fellows in accredited programs, commercial sponsorship for the participation of such learners may occur by contributing to a scholarship fund. The selection of physician trainees and the expenditures of these funds is the responsibility of the Course Director and the relevant Department/Division Chair, Director of Postgraduate Education, or designate. The corporate donor must always remain at arm's length from the decision regarding the specific allocation of such awards.

Gifts & Payment to Teachers

a) University of Toronto Faculty

The planning committee may consider payment of University of Toronto faculty speakers for their participation at a CPD event based on departmental/divisional guidelines.

At the discretion of the course director, expenses incurred in making a presentation may be reimbursed, and small gifts are acceptable.

Exceptional circumstances may occasionally be recognized.⁶

b) Guest Faculty / Visiting Speakers

It is appropriate for guest faculty at conferences or meetings to accept both reasonable honoraria and reimbursement for personal travel, lodging, and meal expenses. Guest faculty may not be paid directly by commercial organizations, but should be paid through the course planners. Remuneration should be commensurate with the work completed.

⁶ For example, lengthy contributions to CPD may be reimbursed according to departmental / divisional guidelines and this policy.

POLICY ON SPONSORSHIP

Gifts & Payment to Teachers

c) Payment to Learners

Payment to learners is not permitted. This includes consultant or advisory arrangements. Such arrangements should not be used to justify the compensation of participating health professionals for their time, travel, lodging, or other out-of-pocket expenses.

(See also point c - "Payments to Registrants" in Registration section on p.11)

Acknowledgements

Course directors may acknowledge commercial support as noted below.

Advertising for commercial products by name or by indication is not permitted.

(a) Course Brochures

Commercial sponsors may not be listed in any part of: the schedule of activities or any material related to the academic content, the list of faculty (including planning committee members and speakers), the course objectives, or on the front of brochures. Educational grants are documented in course brochures under "Acknowledgements."

(b) Posters, Flyers and One-Page Brochures

Acknowledgements may be listed at the bottom in a font not larger than the text of the brochure.

(c) Websites and other Electronic Formats

In a one-page or one-screen format, acknowledgements may be listed in a font not larger than the text of the brochure. In a multi-page or multi-screen format, acknowledgements may not be on the main (home) page, on a list of faculty or with the learning activities.

Advertisements and promotional materials are not permitted on websites for CPD programs. "Pop-ups" are not allowed. Links must open a new window, leaving the educational site open in the background.

Links to commercial sponsors' home pages (but not to pages related to product) may be established, on the acknowledgments page, so long as disclaimers are clearly in place, indicating that the University of Toronto is not responsible for the linked content.

POLICY ON SPONSORSHIP

Acknowledgements

(d) Printed CPD Handouts or Syllabi, Advertisements and Promotional Materials

Advertisement and promotional materials must not be inserted within the pages of the CPD content. They may be inserted at the end of the syllabus, not facing any content, and must be clearly marked as advertising or promotional content.

(e) Live Activities

Commercial displays and materials must be in a separate room from educational activities. Providers may not allow representatives of commercial interests to engage in sales or promotional activities during the accredited program. In acknowledgement of commercial sponsors, e.g. presentation slides or announcements, only the company name may be used. The use of product names is strictly prohibited.

Use of University of Toronto Name & Logo

For events that are accredited or approved by Continuing Professional Development, the name and logo of the University of Toronto or Faculty of Medicine Department may be used.

For all other events, the name and logo of the University of Toronto or Faculty of Medicine Department may be used if the accrediting body of that event is explicitly stated on the brochure and other promotional materials.

POLICY ON SPONSORSHIP

Glossary of Terms

Accreditation (applies to CPD courses, events and educational resources)

For the purposes of this policy, accreditation implies the successful review of an educational activity or resource by the Faculty Council CPD Committee. Upon accreditation, Continuing Professional Development, Faculty of Medicine may assign credits of The College of Family Physicians of Canada (CFPC), the Royal College of Physicians and Surgeons of Canada (RCPSC), the American Medical Association (AMA), and the European Union of Medical Specialists (EUMS). *Effective January 1, 2014, CPD and all other Canadian university CPD offices have been enabled to designate AMA and EUMS accreditation through reciprocal agreements between the RCPSC and the AMA and EUMS respectively.*

Accredited Provider

A non-profit, health professional organization or group, that plans, delivers and evaluates continuing education activities. This definition excludes pharmaceutical companies and their advisory groups, medical and surgical supply companies, communication companies, and other for-profit organizations.

Approval

For the purposes of this policy, approval implies the successful review of an educational activity or resource by a peer review process.

Continuing Professional Development Event

An educational event that is based on identified learning needs, has a purpose or objectives, and is evaluated to assure the learning needs are met. An educational event is distinct from a social event.

Conflict of Interest

A conflict of interest may arise where an individual's personal or other interests are in actual, potential or perceived conflict with their duties or responsibilities to provide education or participate in an educational event. Mere existence of a conflict of interest does not imply wrongdoing; however, when conflicts of interest do arise, they must be recognized, disclosed and properly managed. For the purpose of this document, relevant potential conflicts will be those from the past five years.

Commercial Interest

Any entities that do business with the intent or possibility of commercial gain, generating a profit, or increasing equity. This does not include charitable organizations, military, non-governmental (NGO) or quasi-governmental organizations.

Commercial Sponsor

A company, organization, institution, government agency or other entity (for-profit or not-for-profit) that contributes financial or in-kind resources to a CPD course or other activity.

POLICY ON SPONSORSHIP

Glossary of Terms

Consulting

Consulting relationships include contractual relationships, advisory boards, speakers bureaus, research and any relationship whereby the faculty member receives, or has the expectation to receive, income for services other than for clinical or university work. This includes honoraria, commissioned papers, and fees for speaking, chairing and administration of meetings including in-kind considerations.

Learner (Participant / Registrant)

Learners are students whose learning needs have priority. Learners are responsible for identifying knowledge gaps, actively participating in filling them, and keeping track of their learning gains. Teachers are expected to facilitate this process.

Speakers Bureau

This is defined as a relationship in which the faculty member is under contract to, or paid by, a company and the company selects any of: the topic, any part of the content of a talk, or any members of the audience. Programs run by for-profit educational companies are included in this category.

Unrestricted Educational Grant

All funds from a commercial source should be in the form of an educational grant payable to the institution or organization sponsoring the CPD activity, with no stipulations attached such as selecting faculty, authors, participants, or any matters related to the content.

It is acceptable to designate an unrestricted educational grant to a specific CPD event. Subsidies must not be accepted if specifically designated for hospitality purposes.