

POLICY ON SPONSORSHIP SUPPORT OF UNIVERSITY OF TORONTO ACCREDITED PROGRAMS AND CONFERENCES

This policy applies to Continuing Professional Development (CPD) programs and conferences accredited by the University of Toronto (U of T) that are receiving financial or in-kind sponsorship support from for-profit and/or notfor-profit and/or public sector organizations. This policy governs in-person, digital and asynchronous educational programming.

University of Toronto Accredited CPD programs and conferences are also subject to the National Standard for Support of Accredited CPD Activities and the CMA Guidelines for Physicians Interactions with Industry.

The intent of these policies, standards and guidelines are to safeguard the integrity of accredited CPD activities from the influence of sponsoring organizations that could lead to bias. The general guiding principles are that CPD activities must be balanced and unbiased, based on best scientific evidence, and focused on advancing the knowledge, skills, attitudes of learners.

Organizers of U of T Accredited programs and conferences must ensure that their interactions with sponsors meet professional and legal standards including the protection of privacy, confidentiality, copyright and contractual law regulations.

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Independence in Planning and Development of CPD Programs and Conferences

Introduction

University of Toronto Accredited programs and conferences must be free from sponsor influence, based on best scientific evidence and focused on improving the knowledge, skills, attitudes and behaviours of learners. CPD educational content must be current, objective, scientifically rigorous and address the learning needs of the target audience.Programs and conferences must be fair, balanced, and free of bias.

A Scientific Planning Committee (SPC) must oversee the learning needs assessment, content development and delivery, and compliance with conflict of interest disclosure requirements. The SPC is also responsible for the organization and financial oversight of the CPD program, which also must be free from influence, direction or administrative support from sponsors.

1.1 Scientific Planning Committee

All University of Toronto Accredited CPD programs and conferences must have a Scientific Planning Committee (SPC). The SPC works to meet the educational needs of healthcare professionals and patients, and advance the transfer of knowledge to practice. SPCs are essential for high quality CPD programming and responsible for ensuring that educational programs adhere to accreditation standards.

Representatives of a sponsor, or any organization hired by a sponsor, cannot sit on the SPC nor direct nor participate in

discussions or decisions related to any aspect of the program or conference.

The SPC must be led by a Program Director/Co-Director or Conference Chair/Co-Chair who holds an academic appointment in the Temerty Faculty of Medicine or the Dalla Lana School of Public Health at the University of Toronto. The SPC must have representation from the intended target audience/s. If applying for College of Family Physicians of Canada Mainpro+ certification, the SPC must also include a current member of the College of Family Physicians of Canada.

All members of the SPC must disclose, in writing, all relationships with for-profit, not-for-profit and public sector organizations within the past 2 years to the committee. See link to the disclosure form below.

The SPC is responsible for the following:

- Identification of the educational needs of the intended target audience through conducting a comprehensive needs assessment.
- Development of educational learning objectives.
- Selection of educational methods.
- Selection of scientific planning committee members, speakers, moderators, facilitators and/or authors.
- Development and delivery of content.
- Evaluation of outcomes.
- Oversight of logistics and financial management
- Having a process in place for reviewing and mitigating conflict of interest disclosures.
- Having a process in place to deal with instances where content delivery is not in compliance with accreditation requirements.
- Ensuring sponsorship support and programming comply. with accreditation standards





1.2 Program Content and Selection of Topics and Speakers

U of T Accredited CPD programs and conferences must be planned to address the educational needs of the intended target audience, whether that be practicing health care practitioners, faculty, trainees and/or students. The specific interests of sponsors must have no direct or indirect influence on the content, materials or identification of target audience. The linking or alignment of a sponsor's name (or other branding strategies) to a specific education session or section of the accredited program is prohibited. For information and guidance on how to conduct a needs assessment and writing learning objectives, see CPD's Quick Tips and Resources page (link below).

A comprehensive learning needs assessment should be conducted that identifies both perceived and unperceived learning needs. The learning needs assessment should be conducted prior to any contact or negotiation with potential sponsoring organizations.

The overall program/conference learning objectives must be determined by the SPC before selecting the speakers and determining the content and format for individual sessions. Program learning objectives are brief statements that articulate what participants will be expected to be able to do differently after active participation in the program/conference. The objectives must be developed without sponsor influence.

The selection of topics, speakers, and educational materials are entirely the responsibility of the SPC. All speakers must be identified by the SPC and invited by the Program Director/ Conference Chair on behalf of the committee.

The choice of speakers, subjects of presentations, travel arrangements, registration, expenses and honoraria must all be

Visit the CPD's <u>Quick</u> <u>Tips and Resources</u> <u>Page here.</u> arranged and paid by the U of T Department, hospital, society or other not-for-profit physician organization planning the CPD program, and not through sponsor organizations nor their agents.

It is the responsibility of the SPC to ensure programs are balanced and unbiased . The content and materials provided by speakers should provide (where applicable) a balanced view across all relevant options related to the content area. Content must be based on scientific evidence and free of sponsor influence. Description of therapeutic options must utilize generic names and not reflect exclusivity and product branding. In those circumstances where there is only one product or drug, a fair assessment must be presented to learners.

1.3 Evaluation

All U of T Accredited CPD programs or conferences must have a mechanism for learners/participants to evaluate the program. The Royal College and the CFPC have a number of mandatory evaluation questions, including:

- Were the stated learning objectives (for each individual session and overall program) met?
- Were the speakers balanced and unbiased?
- Did you perceive any degree of bias in any part of the program? Yes/No, if yes, please explain.
- A question related to commitment to change.

For more guidance on how to develop evaluations to measure learning outcomes, see CPD's Quick Tip on Program Evaluation and Sample Evaluation Templates:

- Program Evaluation Quick Tip
- Program or Conference Session Evaluation Template
- <u>Simulation Evaluation Template</u>
- <u>RCPSC Section 3 Self-Assessment Activity Evaluation</u>
 <u>Template</u>

1.4 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 on presentation slides and in all printed materials.

Conflict of Interest and Disclosure

Introduction

All members of the SPC, speakers, moderators, facilitators and authors must complete, sign and submit to the Program Director/Conference Chair the University of Toronto Faculty & Planning Committee Disclosure Declaration Form: https://www. cpd.utoronto.ca/brochures/Faculty-and-Scientific-Planning-Committee-Disclosure-Declaration-Form.docx.

The types of relationships with for-profit, not-for-profit, and public sector organizations (e.g. pharmaceutical organizations, medical device companies, communication firms, government agencies, charitable organizations, patient advocacy groups, research groups) over the previous 2 years that must be disclosed include (but not limited to):

- Any direct financial payments including receipt of honoraria
- Membership on advisory boards or speakers' bureaus
- Funded grants or clinical trials
- Patents on a drug, product or device
- In-kind support, such as laboratory equipment donations
- All other relationships, contracts, commissions, consulting, or investments that could be seen by a reasonable, wellinformed participant as having the potential to influence the content of the educational program

Any SPC member, speaker, moderator, facilitator or author who fails to disclose potential or real conflicts of interest cannot participate in the accredited CPD program/conference.

In addition to the formal disclosure process, SPC members must avoid promoting any service or product for personal gain. Access <u>the University</u> of Toronto Faculty & <u>Planning Committee</u> <u>Disclosure Declaration</u> <u>Form here</u> They must also avoid influence or interference over program content or speaker selection that could undermine their professional integrity resulting from these relations.

2.1 Scientific Planning Committee (SPC) Conflict of Interest Disclosure

All members of the SPC must submit a completed disclosure form to the Program Director/Conference Chair. The SPC is required to review all disclosures, and manage any potential conflict of interest. Completed forms must be held on file for audit purposes for 1 year.

2.2 Speaker, Moderator, Facilitator, or Author Conflict of Interest Disclosure

The Program Director/Conference Chair is responsible for ensuring that disclosures are collected from speakers, moderators, facilitators, SPC members, and authors; and reviewed before the start of the program or conference.

The SPC must also have a process in place to mitigate any conflict of interest that is disclosed. Please note that it is the responsibility of the SPC to determine what steps will be taken to mitigate any potential or real conflicts of interest; this cannot be left to the individual speaker, moderator, facilitator or author.

The SPC must also have a procedure in place to address a conflict of interest that may be identified during the program or conference.

2.3 Disclosure to Learners/Attendees

At the start of a program or conference, the SPC must verbally and visually disclose to learners any sponsorship support received, as well as any declared conflicts of interest made by members of the SPC and visually or verbally display declared conflicts of interest made by Speakers, Moderators, Facilitators, or Authors. Where applicable, disclosures should also be made in the course syllabus or handouts.

In addition, for each individual session, all speakers, moderators, or facilitators must include a written disclosure of relationships as the second slide of their presentation, even in cases where there is nothing to disclose. The disclosure must also include the steps taken by the

SPC to mitigate the conflict of interest. The speakers, moderators or facilitators must also verbally disclose to the learners. As noted above, completed forms must be held on file for audit purposes.

At the start of a program or conference, the SPC must verbally and visually disclose any sponsorship support received to learners. As well as any declared conflicts of interest made by members of the SPC and visually or verbally display declared conflicts of interest made by speakers, moderators, facilitators, or authors. Where applicable, the organizer must add any disclosure in the course syllabus or handouts.

In addition, for each session, all speakers, moderators, or facilitators must include a written disclosure as the second slide of their presentation, even in cases where there is nothing to disclose. The speakers, moderators or facilitators must also verbally disclose to the learners. Finally, as noted above, completed forms must be held on file for audit purposes.



Collection and Direction of Sponsorship Support Funds

Introduction

Sponsorship support funds must be received in the form of an unrestricted educational grant and be held by the University of Toronto, hospital, society or other not-for-profit physician organization. Sponsors are not permitted to direct the use of these funds, nor are they to be tied to support of any element of the program/conference.

3.1 Use of Funds: Unrestricted Educational Grants

All sponsorship support funds must be provided in the form of an unrestricted educational grant. It is acceptable to designate an unrestricted educational grant to a specific program or conference; however, the funds must be undirected and support the overall educational programming of the program/ conference. Unrestricted educational grants must be directed to a general revenue pool for a program or conference. Under no circumstances can sponsorship support funds be used to directly support or sponsor specific program or conference elements.

Use of funds to offset incremental costs associated with accepting the unrestricted educational grant and administering the sponsorship support, such as increased costs associated with exhibit space, is also permitted.

3.2 Multiple Sponsor Requirement

CPD programs/conferences must have sponsorship support from multiple sources to avoid the perception of ownership or influence that a single sponsor may imply. It is preferential to have multiple sponsoring organizations that have competing products or services to provide balance.

3.3 Written Sponsorship Support

It is mandatory that a written agreement, signed by both the Program Director/Conference Chair and the sponsor, be in place. The agreement must detail the terms, conditions, and purpose by which the sponsorship is provided. The agreement must be held on file for audit purposes

3.4 Collection and Disbursement of Funds Agreement

Funds must be received, held and dispersed centrally by a University of Toronto Department, hospital, society or other not-forprofit physician organization. Funds cannot be held by individuals or in non-institutional bank accounts. Financial responsibility and management of programs and conferences cannot be delegated to a third party or commercial interest.

3.5 Financial Records and Audits

Financial statements for each program/conference should be available for review and audit. Mechanisms should be established by the SPC to assure compliance with University and national standards. Upon request, SPCs must disclose how financial and in-kind support was used. Find a <u>sample</u> <u>template agreement</u> <u>here.</u>

Program Delivery and Management

Introduction

The following details guidelines on use of sponsorship funds and sponsor invovlement in program delivery.

4.1 Use of University of Toronto Name and Logo

For University of Toronto Accredited programs and conferences, the host University of Toronto Department (ex. Department of Surgery, Department of Psychiatry) and/or the U of T CPD logo may be used. Use of the general University of Toronto or Temerty Faculty of Medicine logos is prohibited, including but not limited to websites, emails, conference materials, or slides.

Sponsoring organizations are not permitted to use the University of Toronto, Temerty Faculty of Medicine, CPD Office, Departmental or program/conference branding or logos. It is prohibited for sponsoring organizations to use the name of any of the institutional/departmental logos of the University of Toronto in a manner that constitutes promotion of a product or sponsor organization.

Please ensure Departmental, CPD Office, Temerty Faculty of Medicine, and U of T branding guidelines are followed. The CPD style guide is available at: http://www.cpd.utoronto.ca/reports/ CPD-CondensedStyleGuide.pdf

Access the <u>CPD style</u> guide here.

4.2 Registration Fees

Sponsorship support cannot be used to cover the costs of an entire accredited program. A registration fee must be charged for any in-person, online or hybrid offering. Registrants should bear financial responsibility for attending the program to reduce perceived or real influence on learning (The fee can be waived for SPC members, faculty, speakers, or patients. It is permissible to have a different fee structure, for example, to offer a reduced fee for non-physician health professionals. Reduced or waived fees for students or trainees are permitted. Exceptions to the mandatory registration fee requirement include rounds, faculty development activities, Ministry of Health-funded programs, and departmental research days.

4.3 Registration and Participant Lists

Registration and payment for programs and conferences must be directed through the University of Toronto, hospital, society or other not-for-profit physician organizations. Registration is not permitted to be conducted through a sponsoring organization, agent, affiliate, industry representative, a medical communications company, or other similar organization.

Under no circumstances can attendee lists or contact information be provided to sponsoring organizations. Explicit consent must also be obtained from participants for this information to be shared with other attendees.

4.4 Scholarships, Bursaries and Payment to Learners

U of T accredited programs and conferences cannot make payments to learners as an incentive to attend. In addition, sponsorship support funds cannot be used either directly or indirectly to provide or subsidize travel, lodging, honoraria, or personal expenses to learners/attendees or their guests. Payment to learners who are acting as consultants or advisors to the program or conference is also prohibited. Such arrangements are not a justification to provide compensation for time, travel, lodging or other expenses.

Unrestricted educational grant funds can be used to establish a scholarship or bursary programs to assist current students, residents or fellows. The scholarship or bursary program cannot be tied or attributed to a sponsoring organization. The selection of trainees and the expenditures of these funds is the responsibility of the SPC, Program Director/Conference Chair, Department/Division Chair, Director of Postgraduate Education, or designate. Sponsoring originations or their representatives can have no involvement in the specific allocation of awards.

4.5 Payment to Faculty and Speakers

University of Toronto Faculty

Payment of a reasonable honorarium to University of Toronto faculty member speakers for their participation is permitted but not required. Honoraria amounts and payment methods should follow departmental/divisional guidelines. At the discretion of the SPC, expenses incurred in making a presentation may be reimbursed, and token gifts are acceptable. Note that honoraria beyond a nominal amount are generally considered taxable income.

Guest Faculty/Invited External Speakers

It is appropriate for guest faculty or invited external speakers at programs or conferences to be provided with both reasonable honoraria and reimbursement for personal travel, lodging, and meal expenses. Remuneration should be commensurate with the work completed and/or the cost of time away from practice. Reimbursement for Business Class travel must be approved in advance through a written request submitted to the Vice Dean, Medical Education or the relevant Department Chair. Guest faculty honoraria and expense reimbursements must be issued from general conference revenues. In no circumstance can guest faculty honorarium or expenses be paid directly by a sponsoring organization or agent. As noted above, honoraria beyond a nominal amount are typically considered as taxable income, and payments to non-Canadian residents are subject to withholding taxes.

4.6 Tagging

Tagging is the labelling of a specific element of a program or conference as being funded by a specific sponsor, such as "sponsored by [Sponsor Name]", "brought to you by [Sponsor Name]." Tagging is strictly prohibited, including (but not limited to) educational sessions meals, breaks, social events, branded wifi names, cell phone charging stations, delegate bags, prizes or gifts or similar online/virtual manifestations of these activities.

4.7 Meals and Breaks

As noted above, sponsor funds cannot be used to subsidize food and beverage. It is not permitted for supporting organizations to be recognized or acknowledged as sponsoring meals or breaks (no tagging).

4.8 Social Events

Social events related to an accredited CPD program are permitted; however, they cannot take place simultaneously with, or in competition to, the accredited educational program. Sponsors may not directly or indirectly be involved in planning, supporting or subsidizing social events. Sponsoring organizations cannot be acknowledged as funding social events (no tagging). Facilities, catering and other activities should be in keeping with arrangements that would have been made without sponsorship support for the program/conference.

4.9 Sponsor Exhibit Booths and Commercial Displays

It is permitted to provide sponsoring organizations exhibition space in exchange for sponsorship support. However, there are restrictions on what sponsors are permitted to display and distribute. All sponsor booths, commercial displays and materials must be in a separate room from educational activities, for example, in a separate meeting room, hallway, etc. or, in the online/virtual exhibit hall, on a separate tab or page from the educational material. Exhibits must not influence the planning or interfere with the presentation of the educational program. Sponsor representatives must restrict promotional activities to the non-accredited program or breaks. Sponsor representatives are not permitted to conduct product or service sales.

As noted above, sponsoring organizations are not permitted to use the name or logo of the program/conference, University of Toronto, Temerty Faculty of Medicine, or U of T Department, including in/on their exhibit booth or online material.

Sponsoring organizations cannot distribute promotional items, prizes, gifts, electronic gift cards, food, candy, product samples, or branded items (pens, magnets, etc.). Individual sponsors are prohibited from activities that encourage or entice learners to visit their exhibition booths, such as prizes, raffles, etc. It is permissible for program organizers to encourage participants to visit booths or virtual exhibit halls through a passport/prize activity, provided that it is not linked to a single sponsor.

4.10 Unaccredited CPD Activities

Satellite Symposia

Satellite symposia are non-accredited activities held in proximity (either spatially or temporally) to accredited programs and conferences. These are separate meetings led by sponsors for promotional purposes. The U of T CPD Sponsorship Policy does not apply to Satellite Symposia.

To ensure registrants do not perceive such programs as related or integral to the accredited program, program planners must ensure that:

- Satellite symposia are not listed or included within the preliminary or final program agenda, programs or proceedings, homepage, calendar of events, delegate bags, announcements, etc.
- Registrants are informed that satellite symposia are not part of the accredited program:
- Promotion of satellite symposia appears separately from the program conference or on a separate tab on a conference website with the disclosure that "These are non-accredited, industry-sponsored, Satellite Symposia and are NOT part of the accredited "Title of Program/Conference."
- Activities are promoted (marketed or 'branded') in a way that clearly identifies the satellite program as distinct from the accredited educational program
- The satellite symposia are located in an area separate from the University of Toronto accredited program (either physical or virtual)
- The satellite symposia do not run concurrently with the accredited program
- Food and beverage can be provided by the sponsoring organization during the satellite symposia in the meeting room

Technology Suites

Technology suites provide the opportunity for medical device companies to showcase or sell products outside of the formal accredited program or conference. These are held in meeting rooms or online exhibit halls separate from the main conference facilities. Food and beverages are often provided by the sponsorsing organization in the meeting room. The above requirments for satellite symposia also apply to technology suites.

Sponsor Recognition

Introduction

Acknowledgement of sponsor support is permitted, with the following restrictions: The use of any branded product names is strictly prohibited; only the sponsoring organization's name or logo may be used and cannot appear alongside slogans or branded product names. In addition, any form of sponsor acknowledgement must be distinct and separate from the educational content.

5.1 Sponsorship Tiers

It is permissible to have differentiated levels of sponsorship based on dollar amounts. In addition, each tier can be provided with a specific recognition package, including booth size or online presence.

5.2 Websites

Sponsors must be recognized on a separate tab labelled "Sponsors" on a program or conference website. Sponsor logos cannot appear on the meetings/conferences home page or in other sections or pages of the website. "Pop-ups" are not allowed. Sponsor advertisements and promotional materials are not permitted on the website; however, external links to sponsor websites are permitted, but direct links to pages related to products are not permitted. It should be clearly indicated that the University of Toronto is not responsible for the linked content.

5.3 Promotional Emails and E-Blasts

Sponsors may be acknowledged in text only (no logos) and listed at the bottom in a font size no more significant than the body text.

5.4 Social Media

Sponsors may be acknowledged and thanked in social media posts as a group and not individually.

5.5 Posters, Flyers and One-Page Brochures

Acknowledgements may be listed at the bottom in a font size no larger than the brochure's text.

5.6 Program/Conference Brochures, Agendas, Programs, Proceedings, Syllabi

Sponsors may be listed in a section entitled "Acknowledgments." However, they cannot be listed in any part of the schedule of activities or any materials related to the academic content, the list of faculty (including planning committee members and speakers), the course objectives, or on the front of multi-page brochures. Sponsor advertisements are permitted; however, they must be printed at the end of the material, not facing any educational content, and must be marked as advertising or promotional.

5.7 During the Live Program

Sponsors can be acknowledged and thanked in opening remarks, and on presentation screens in meeting rooms during breaks, in an online lobby, or on signage external to the areas where accredited programming occurs. In acknowledgement of sponsors, only the organization name may be used. As noted above, the use of product names is strictly prohibited.

5.8 Delegate Products

Sponsor logos can be printed on delegate bags provided there are multiple sponsors appearing. Brand names or slogans cannot be printed or used on the products. Sponsorship material is permitted to be included in/with the product as long as accreditation educational material (syllabi) is distributed separately.

5.9 Sponsor Promotional Materials and Flyers

Sponsor or product advertising, promotional materials or branding strategies cannot be included on/appear within locations where accredited CPD sessions occur, including before or after the accredited education session. Advertisement and promotional materials must not be inserted within the pages of the CPD educational content.