

**CALIFORNIA SOCIETY OF HEALTH-SYSTEM PHARMACISTS
PROPOSAL IN STP FORMAT**

PROPOSAL: Deletion of Professional Policies Pertaining to Continuing Pharmacy Education

SUBMITTED BY: CSHP Board of Directors

DATE: June 2, 2010

SITUATION:

1. CSHP is accredited by ACPE to provide continuing pharmacy education.
2. CSHP has recently undergone an extensive six-year self-assessment review with ACPE.

TARGET:

1. CSHP continues to be an accredited provider of ACPE.
2. CSHP Professional Policies are relevant and up to date.
3. Policies pertaining to CPE administration are included in the CSHP Administrative Policy catalog.

PROPOSAL:

1. Amend/Delete the following Professional Policies as indicated (strikeouts are deletions and underlined text is amended language).
2. Policies concerning CPE administration are being moved to the Administrative Policy Catalog.
3. Add pertinent policies to the Administrative Policy Catalog.

DELETE PROFESSIONAL POLICY 2006-03

Note: this policy has been amended and added to the Administrative Policy Catalog.

2006-03

Guiding Principles for Acceptance of Advertising, Advertisers, Sponsors, and Exhibitors

Source: ~~_____~~ HOD 10/20/96

(Note: ~~This is former policy #9009 approved by the HOD in 1990; modified and reaffirmed by the HOD in 1996; reaffirmed by the HOD in 2001 as #2001-02; modified and reaffirmed by the HOD in 2006 as #2006-03).~~

~~The California Society of Health System Pharmacists (CSHP) shall include this document in the exhibitors' prospectus kit.~~

~~WHEREAS, the California Society of Health System Pharmacists (CSHP) seeks to support, without compromise, the interests of its Members and their efforts to promote~~

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the interests of their patients and the public in matters related to drug therapy and health care, and

WHEREAS, the California Society of Health-System Pharmacists (CSHP) seeks to promote, protect and elevate the integrity and professionalism of the practice of pharmacy, and

WHEREAS, the CSHP recognizes that sponsorship and advertising are both established and important means to support the discussion of topics and dissemination of information pertinent to the practice of pharmacy, and

WHEREAS, the CSHP accepts the responsibility to monitor the quality and integrity of the advertisers, sponsors and exhibitors, and their materials, whose economic support the Society accepts to further the Society's goals,

CSHP adopts the following CSHP Guiding Principles for Acceptance of Advertising, Advertisers, Sponsors, and Exhibitors.

1. — Advertisements, advertisers, sponsors or exhibitors will be accepted, subject to these guidelines and to editorial or other approval, from any vendors of products or services of potential interest to California Society of Health-System Pharmacists members.
2. — Advertisers, sponsors, or exhibitors, or their material may not be accepted if, in the sole opinion of CSHP, they:
 - a. — Violate law or the ethics of pharmacy practice.
 - b. — Contain or are related to inappropriate, indecent, offensive or unprofessional products, services, events, acts, text, illustration or display.
 - c. — Make attacks, defamatory inferences or are otherwise of an offensive personal, racial, religious, ethic or sexist nature or are contrary to law or professional ethics regarding discrimination.
 - d. — Make claims found by any court or governmental agency to be invalid or in violation of the law.
 - e. — Make sweeping superlatives or extravagantly worded claims, unfair comparisons, or blatant or unwarranted disparagement of a competitor's product or service.
 - f. — Suggest a profit or personal benefit accruing to a pharmacist for the sale or recommendation of a product or service.
 - g. — Are advertisements, displays, etc., that offer payment, free goods or premiums of any kind to the benefit of a pharmacist in connection with the sale, recommendation or purchase of a product or service.
 - h. — Are advertisements, displays, etc., that are deceptive, misleading or imitate in presentation, layout, artwork or format an editorial or scientific publication or contain an explicit or implied connection with CSHP editorial content or policy.
3. — Advertisements, sponsorships or exhibits that tend to limit the effectiveness of CSHP programs, or that promote concepts or practices that are contrary to CSHP policy may not be accepted.
4. — Tobacco products are not eligible for advertising.

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5. ~~The CSHP Board of Directors, or its designee, shall make the final decision regarding the eligibility of all advertisers, sponsors or exhibitors and the materials accepted for CSHP publications or events.~~
6. ~~Acceptance of advertiser, sponsor or exhibitor participation in any CSHP publication, meeting, activity or event does not constitute CSHP endorsement of any product or service nor does it warrant in any way the safety, effectiveness, or quality of any related products or service.~~
7. ~~Acceptance by CSHP as an advertiser, sponsor or exhibitor shall not be used for promotional purposes without the written permission of CSHP.~~
8. ~~Advertisers, sponsors or exhibitors may be required to submit data to support the validity of any claims, including claims of safety or effectiveness of a product or service.~~
9. ~~CSHP reserves the right to conduct an onsite review of an advertiser's, sponsor's or exhibitor's facilities or may request an onsite review of a prospective advertiser's, sponsor's or exhibitor's facilities and no reference of either type review shall be permitted for any promotional purpose.~~
10. ~~CSHP, through its Board of Directors or designee (i.e., CSHP President), reserves the right to remove any advertisements, advertisers, sponsors, or exhibitors from the CSHP premises or exhibits for any violations of the above policy.~~
11. ~~CSHP reserves the right to modify these principles without notice to advertisers, sponsors or exhibitors.~~

DELETE PROFESSIONAL POLICY 2007-11

Note: this policy has been amended and added to the Administrative Policy Catalog.

#2007-11

Continuing Education Funded by the Health Care Industry

Source: ~~_____~~ HOD 10/19/97

(Note: This is former policy #9215 approved by the HOD in 1992; reaffirmed by the HOD in 1997 as policy #9702; reaffirmed by the HOD in 2002 as 2002-02; modified and reaffirmed by the HOD in 2007 as #2007-11).

1. ~~Multiple company support shall be sought for CSHP-sponsored events.~~
2. ~~CSHP proactively solicits health-care industry support of educational events in the form of unrestricted grants-in-aid.~~
3. ~~The CE Program Committee shall select program speakers, topics and program formats with the goal of maximizing objectivity, balance and scientific rigor of the material presented.~~

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4. ~~Speakers shall disclose affiliations with the health care industry per the established CSHP disclosure policy.~~
5. ~~Material from CSHP-sponsored CE programs shall not be used for future promotional activities by anyone, unless the Board of Directors expresses written consent.~~
6. ~~CSHP shall not co-sponsor educational activities with other organizations unless these policies are followed by all such sponsoring organizations.~~
7. ~~The Program Committee for CSHP-sponsored events shall determine, through an item in the program evaluation, if there was perception of undisclosed speaker bias. Results of this evaluation shall be reviewed in selecting speakers for future programs.~~

DELETE PROFESSIONAL POLICY 2008-02

Note: this policy has been amended and added to the Administrative Policy Catalog.

#2008-02

Guidelines and Co-sponsorship Agreements for CSHP Programs

Source: ~~HOD 10/28-31/93~~

~~(Note: This is former policy #9319 approved by the HOD 10/31/93; reaffirmed by the HOD in 1998 as policy #9803; reaffirmed by the HOD in 2003 as #2003-02, reaffirmed by the HOD in 2008 as # 2008-02).~~

~~The California Society of Health-System Pharmacists, as an approved provider for continuing pharmaceutical education programs, may work with other providers or non-providers to design, develop and implement quality programs in accordance with the ACPE Criteria for Quality.~~

~~When not the approved provider, CSHP may work with other providers to present programs. However, the criteria in the attached Co-sponsorship Agreement and the Co-sponsorship Responsibilities Checklist must be followed. CSHP will take appropriate steps to insure that presentation of course material does not reflect the commercial view of the approved provider (see checklist).~~

CE CO-SPONSOR RESPONSIBILITIES CHECKLIST

Title of Course _____

Location _____

Date presented or available _____ Expiration Date _____

Number of hours awarded _____ ACPE No. _____

~~Co-sponsorship involves a cooperative planning relationship between two providers. The approved provider must be directly involved in key components of program development. Below is a list of the key components. This co-sponsorship checklist should reflect which provider will develop or handle the component although the program's approved provider is ultimately responsible for assurance that all quality criteria are met.~~

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- ~~Component: Responsible Party~~
~~Educational needs assessment and topic selection _____~~
~~2. _____ Goals and learning objectives development _____~~
~~3. _____ Promotional materials development and distribution _____~~
~~4. _____ Faculty selection and guidance _____~~
~~5. _____ Instructional materials development _____~~
~~6. _____ Program administration and implementation _____~~
~~7. _____ Staff support _____~~
~~8. _____ Site and facility selection _____~~
~~9. _____ Program evaluation _____~~
~~10. _____ Assessment of participant learning _____~~
~~11. _____ Awarding of certificates of credit for successful completion _____~~
~~12. _____ Program budget _____~~
~~13. _____ Maintaining all records _____~~
~~14. _____ Other, please specify _____~~

~~As necessary, specific details of each component should be outlined on additional pages.~~

~~_____~~
~~CSHP Executive Vice President _____ Date~~

~~_____~~
~~Co-sponsor Representative Signature _____ Date~~

~~CALIFORNIA SOCIETY OF HEALTH-SYSTEM PHARMACISTS
CONTINUING EDUCATION CO-SPONSORSHIP AGREEMENT~~

~~The California Society of Health System Pharmacists (hereafter referred to as the Provider) and _____ (co-sponsor's name) (Hereafter referred to as the Co-sponsor) agree that the program titled _____ to be presented on _____ (date[s] and time[s]) at _____ (location) _____ is for scientific or educational purposes only and not for the purpose of promoting any product and that any discussion of the Co-sponsor's products will be objective, balanced and scientifically rigorous.~~

~~All parties agree that the Provider will retain complete responsibility for exercising full control over the planning of the aforementioned program's content, including the selection of presenters and moderators. The Co-sponsor agrees not to direct or influence the content of the program and to play no role in the selection of presenters or moderators other than responding to Provider requests for suggestions of presenters or sources of possible presenters. Selection of a presenter suggested by the Co-sponsor will be disclosed to the program participants at the beginning of the program. The Provider will also disclose to the audience, at the time of the program, acknowledgment of funding received from the Co-sponsor and any significant relationship between the Provider and the Co-sponsor and between individual presenters or moderators and the Co-sponsor.~~

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~~The Co-sponsor agrees not to engage in scripting, targeting of points for emphasis, or activities that are designed to influence the content of the program. This does not preclude limited technical support requested, by the Provider or presenters from the Co-sponsor in preparing audiovisual materials.~~

~~The Co-sponsor agrees not to have any promotional activities, such as product advertisement or promotional exhibits, in the same room or in an obligate pathway to the educational activity. Exhibits within an area that is designated for general exhibits and includes exhibits from different companies marketing alternative or competitive therapies is permitted.~~

~~If a product marketed by the Co-sponsor or in competition with such a product is to be the subject of substantial discussion, the Provider will take steps to ensure the data is presented objectively, and that both favorable and unfavorable information will be fairly represented. The Provider and Co-sponsor agree to ensure meaningful disclosure of any limitations on information that is presented.~~

~~The Co-sponsor and Provider will ensure that if unapproved (unlabeled) uses are discussed, presenters will be required to disclose that the product is not approved in the United States for the use under discussion.~~

~~The Provider, in the case of live presentations, will ensure that meaningful opportunities for scientific debate or questioning will be provided during the program.~~

CSHP Executive Vice President _____ Date

Co-sponsor Representative Signature _____ Date

DELETE PROFESSIONAL POLICY 2008-12

Note: this policy as been amended and added to the Administrative Policy Catalog.

#-2008-12

Disclosure Policy for Board of Directors, Staff and Management Teams

Source: HOD 10/28-31/93

(Note: This is former policy #9314 approved by the HOD in 1993; modified and reaffirmed by the HOD in 1998 as policy #9812; revised and reaffirmed by the HOD in 2003 as #2003-13., and modified and reaffirmed by the HOD in 2008 as # 2008-12).

To adopt the following "CSHP Disclosure Policy for members of the Board of Directors, Staff and Management Teams."

Obligation to Promote the Society's Best Interests

Members of the CSHP Board of Directors, staff, and Management Teams shall at all times, seek to promote, enhance and protect the best interests of the Society, shall

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encourage others to do so, and shall scrupulously avoid taking any action that may be adverse to the best interests of the Society.

Obligation to Disclose

a) Substantial Interest

Members of the Board of Directors, CSHP staff and Management Teams shall disclose any substantial interest in, personal contract or arrangement with any firm or individual doing or seeking to do business with the Society. Said disclosure shall be made immediately following election, hiring or appointment and annually thereafter.

Substantial interest is defined as investments of more than one percent (1%) of the discloser's net worth. It is expected that when a potential for conflict of interest exists relative to an item under discussion that the individual announces this. The individual shall refrain from discussion unless asked by the committee on which the affected member is participating and shall refrain from voting on that issue.

b) Receipt of Payments, Gifts or Services

Members of the Board of Directors, CSHP staff and Management Teams shall disclose receipt of any payment, service, or gift from or provided to any firm or individual doing or seeking to do business with the Society. This disclosure shall be made immediately following election, hiring, or appointment and annually thereafter. It is expected that when a potential for conflict of interest exists relative to an item under discussion, that the individual announces this. The individual shall refrain from discussion unless asked by the committee on which the affected member is participating and shall refrain from voting on that issue.

c) Business Dealings with Relatives

No member of the Board of Directors, nor any CSHP staff member, nor any Management Team member, nor any close relative (e.g., spouse, child, housemate, etc.) of a member of the Board of Directors or CSHP staff or Management Team shall do business on behalf of the Society with any relative unless the Society determines after full disclosure that such a business relationship would not adversely influence the actions of the member of the Board of Directors or CSHP staff member with respect to the business of the Society.

Societal Authority

The presidential officers or their designees are vested with the ultimate authority and responsibility for evaluating any set of facts with respect to potential conflicts of interest that may arise, and to determine the best course of action that the Society should pursue in resolving conflict of interest problems. For conflicts of interest among presidential officers, the Board of Directors shall have the responsibility to determine the best course of action.

Record of Disclosure

Disclosure forms shall be kept on file for the duration of term of office or length of service in the office of the Executive Vice President. Meeting minutes shall reflect the Society member's actions arising through disclosure of conflicts of interest.

Comportment of Conflicted Members

The Society recognizes the importance of the individual experience of its members and does not wish to diminish appropriate input when potential conflicts exist. When a member identifies the existence of a conflict, the committee, Board, etc., may seek

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further details about the conflict from the member and should weigh the benefits of the member's experience against the hazards of potential bias before excluding the member from discussions. However, the affected member shall not vote on issues where conflict exists. See [FORM]

~~"The Sunshine Rule"
(Addendum to CSHP Disclosure Policies)~~

~~This supplemental guide is intended to assist the disclosee in determining what relationships are relevant and significant with regard to the perception of possible bias. The determination of "relevant and significant" by the disclosee is by its nature also subject to individual biases. To facilitate disclosure, the Ethics Committee asks that disclosees consider their relationships according to the "Sunshine Rule": if the relationship is examined in the "light of day" (made widely known), would it be perceived that bias exists? If so, the relationship should be disclosed.~~

~~Relationships that should be subjected to "The Sunshine Rule" include:~~

- ~~1. Receipt of significant financial support (honoraria, gifts, donations, expenses in lieu of honoraria, grants or research moneys, etc. or services).~~
- ~~2. Participation in company speaker bureau(s).~~
- ~~3. Significant financial investments in companies that produce a product(s) or service(s) with a direct relationship to the topic and/or agents being discussed, and/or which are potential vendors for CSHP.~~
- ~~4. Other significant relationships/appointments that may introduce bias into presentation content and/or decision-making (e.g., director, officer, partner, trustee, employee or appointment, etc., for an organization with similar or competing interests).~~

~~Examples of situations where relationships would be considered "relevant and significant" and should be disclosed are provided below. These examples are not intended to limit the interpretation of "The Sunshine Rule." Each relationship should be examined carefully by the disclosee for applicability.~~

~~Speaker: A speaker on the topic of "Myocardial Infarction" who has a relationship to a health care industry that makes/markets agents for the diagnosis, treatment and/or prophylaxis of MI. Appropriate disclosure and action would include written and verbal notification of audience that the relationship exists. (If he/she has a relationship to a company that makes/markets only unrelated products which are not being discussed during the presentation, this information may not need to be disclosed [e.g., antibiotics, GI agents, etc.]).~~

~~Board Member or Staff: Sister owns XYZ Printing Services and the CSHP Board is considering a bid from XYZ to service CSHP printing needs. Appropriate disclosure and action would include notification of Board that relationship exists, and to withdraw from all discussion and decisions related specifically to this topic.~~

~~Management Team Member: Is employed by a health care industry and serving on C.E. Committee. Appropriate disclosure and action would include notification of the committee and/or program chair of the relationship. Withdrawal from designated~~

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participation in solicitation of funding, decision making as to acceptance into the program/function, or establishment of other relationships with the specific and/or any corporate-related company, would be upon the request of the Management Team Chair, in discussion with the Board Liaison, based on the development of a potential conflict of interest.

DELETE PROFESSIONAL POLICY 2008-13

Note: this policy as been amended and added to the Administrative Policy Catalog.

2008-13

Disclosure Policy for Presenters at GSHP Functions

Source: HOD 10/28-31/93

(Note: This is former policy #9315 approved by the HOD in 1993; modified and reaffirmed by the HOD in 1998 as policy #9813; revised and reaffirmed by the HOD in 2003 as 2003-14, modified and reaffirmed at the 2008 HOD as #2008-13).

To adopt the following "GSHP Disclosure Policy for Presenters at GSHP Functions."

1. Scope

This policy applies to all individuals making formal presentations, oral and/or visual, at GSHP-sponsored programs or functions (lectures, panel discussions, poster sessions, conferences, etc).

2. Procedure

A. Self-disclosure to GSHP shall be made as follows: All applicable individuals will be required to complete and file a Presenter Disclosure Form with the person(s) responsible for selecting the speaker (i.e., Seminar Continuing Education Committee, other CE program committee/scheduler). The committee or scheduler will be responsible for assuring all disclosure forms are completed and on file within the specified time frame.

B. Reporting Requirements: Any relevant¹ relationships to industry and/or organizations that may introduce the appearance of bias into the specific topic, and/or material being presented, shall be disclosed, including:

- i. Receipt of significant¹ financial support (honoraria, gifts, donations, expenses in lieu of honoraria, grants or research moneys, etc), or services;
 - ii. Participation in company speaker bureaus;
 - iii. Significant¹ financial investments in companies that produce products or services with a direct relationship to the topic and/or agents being discussed;
 - iv. Other significant¹ relationships/appointments that may introduce bias (director, officer, partner, trustee, employee or other appointment, etc., for an organization with similar or competing interests);
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C. ~~Disclosure information will be accessible to the membership as follows:~~

i. ~~The following statement shall be included in promotional materials for meetings involving presenters where disclosure is required:~~

~~“Disclosure statements by presenters will be provided at the time of presentation. A summary of disclosed information may be obtained in advance of the meeting, when such a request is made in writing and accompanied with a self-addressed stamped envelope, within a reasonable time, to the program or function CE chairperson or designee.”~~

ii. ~~The committee or scheduler will assure that disclosure is made:~~

1) ~~In writing via distributed syllabi or handout materials and~~

2) ~~Verbally by the moderator at the beginning of the presentation.~~

¹~~“Relevant and Significant” relevance and significance of relationships is to be determined by the presenter following the “Sunshine Rule”: If the relationship is examined in the “light of day,” would the audience perceive that possible bias exists? If so, the relationship should be disclosed. (See “The Sunshine Rule”)~~

~~Note: Poster presenters will provide a written statement, located on the poster, if no written materials are presented that include a disclosure statement.~~

~~“The Sunshine Rule”~~

~~(Addendum to CSHP Disclosure Policies)~~

~~This supplemental guide is intended to assist the disclosee in determining what relationships are relevant and significant with regard to the perception of possible bias. The determination of “relevant and significant” by the disclosee is by its nature also subject to individual biases. To facilitate disclosure, the Ethics Committee asks that disclosees consider their relationships according to the “Sunshine Rule”: if the relationship is examined in the “light of day” (made widely known), would it be perceived that bias exists? If so, the relationship should be disclosed.~~

~~Relationships that should be subjected to “The Sunshine Rule” include:~~

~~Receipt of significant financial support (honoraria, gifts, donations, expenses in lieu of honoraria, grants or research moneys, etc.).~~

~~Participation in company speaker bureau(s).~~

~~Significant financial investments in companies that produce a product(s) or service(s) with a direct relationship to the topic and/or agents being discussed, and/or which are potential vendors for CSHP.~~

~~Other significant relationships/appointments that may introduce bias into presentation content and/or decision-making (e.g., director, officer, partner, trustee, employee or appointment, etc., for an organization with similar or competing interests).~~

~~Examples of situations where relationships would be considered “relevant and significant” and should be disclosed are provided below: These examples are not intended to limit the interpretation of “The Sunshine Rule.” Each relationship should be examined carefully by the disclosee for applicability.~~

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Speaker: A speaker on the topic of "Myocardial Infarction" who has a relationship to a health care industry that makes/markets agents for the diagnosis, treatment and/or prophylaxis of MI. Appropriate disclosure and action would include written and verbal notification of audience that the relationship exists. (If he/she has a relationship to a company that makes/markets only unrelated products which are not being discussed during the presentation, this information may not need to be disclosed [e.g., antibiotics, GI agents, etc.]).

Board Member or Staff: Sister owns XYZ Printing Services and the CSHP Board is considering a bid from XYZ to service CSHP printing needs. Appropriate disclosure and action would include notification of Board that relationship exists, and to withdraw from all discussion and decisions related specifically to this topic.

Management Team Member: Is employed by a health care industry and serving on C.E. Committee. Appropriate disclosure and action would include notification of the committee and/or program chair of the relationship. Withdrawal from designated participation in solicitation of funding, decision making as to acceptance into the program/function, or establishment of other relationships with the specific and/or any corporate-related company, would be upon the request of the Management Team Chair, in discussion with the Board Liaison, based on the development of a potential conflict of interest.

RESOURCES REQUIRED FOR PROPOSED ACTION(S):

Financial: None
EVP time: None
Staff time: None

CSHP BOARD ACTION:

During the July 9-10, 2010 Board of Directors meeting, the board approved the proposal.