

## **V. Commercial Support and Conflict of Interest Policy**

PPA will use the following criteria in determining if commercial support may even be considered for a program.

- 1) Is there any connection between the presenter and the potential provider of commercial support?

*(No direct connection is permissible. The supporting organization may not be in contact with the presenter or involved in commercial content.)*

- 2) Is the commercial supporting organization expecting anything other than recognition of the support in a brief statement in the program announcement? (E.g. presence at the program, opportunity to speak, table of information, etc.)

*(Only a brief statement referencing commercial support is permitted, and the announcement is made by PPA, not the vendor or speaker. No other recognition is tolerated.)*

- 3) Is the commercial support going directly to the presenter?

*(No direct payment of honorarium or expenses is permitted. Any monies received must be provided directly to PPA for our use in connection with the program.)*

- 4) Was the offer of commercial support made to PPA due to the nature of the presentation?

*(This could be a sign that the provider of commercial support knows about the program and wants to assert influence. PPA will not accept support under these circumstances.)*

If the answer to any of these questions is yes, the commercial support cannot be accepted unless there is a complete and satisfactory resolution to these items.

### **Independence**

Co-sponsorship with a commercial entity is not permitted in any situation. At no time is there to be any connection between any commercial support and the content of any program. If PPA does seek or receive commercial support for a CPE program, this must be completely separate and distinct from the program development process.

All program ideas and topics for continuing education purposes are developed independently through various needs assessment processes (see II. Educational Needs Assessment). Only after a program has been conceptualized, developed, and a speaker identified, will the process of seeking any external commercial support be pursued. Commercial support is pursued by PPA's event planning staff and in a process entirely independent of the CPE Administrator, with oversight by the CPE Supervisor.

To assist in the process of program development and ensure that speakers are fully aware of expectations, especially considering commercial support and bias, PPA provides speakers with an FAQ Sheet (Appendix B) and Program Development Guidance (Appendix A).

At any point during the course of program development, contact between a commercial supporting entity and the faculty is prohibited. PPA event planning staff is the intermediary in coordination of the commercial support to ensure there is no direct contact. The CPE Administrator is responsible for reviewing all content prior to the presentation to ensure that the content is devoid of any commercial message or bias.

If PPA seeks out commercial support for the program, this is done by other staff that does not work with the speaker. Any determination for grants shall be made only by PPA event planning staff and shall not involve or include the presenter. If a grant is awarded, PPA's CPE Administrator shall then make faculty aware of that grant and work with the speaker to ensure there is no recognition, bias, or influence included in the program.

### **Resolution of Conflict of Interest**

All speakers are required to complete a speaker disclosure form which assesses any potential conflict of interest with any commercial entity. (See Appendix C Disclosure Policy & Appendix D Speaker Disclosure Declaration)

This results in one of three actions:

- 1) If the speaker refuses to complete the disclosure, or indicates a conflict of interest that is severe and not able to be resolved, the speaker is released and another speaker is asked to present the program, or the program is cancelled entirely.
- 2) If the speaker indicates a conflict of interest and the conflict is manageable, the CPE Administrator will work with the speaker to resolve the conflict and/or ensure that the program contains no bias, and the speaker will sign an attestation document (see Appendix E Conflict of Interest Resolution Attestation) confirming that the presentation will be of fair and equitable balance.
- 3) If the speaker does not indicate any conflicts of interest, the CPE Administrator will still advise the speaker of the requirements regarding bias and the program will go on as planned.

Even if a speaker does not indicate any conflicts of interest, or if a conflict is indicated and resolved, the CPE Administrator will review the program content prior to the presentation to ensure it is devoid of any commercial message or bias. If the presentation includes inappropriate content, the CPE Administrator will request the speaker remove it and assist in

this process as needed. Should the speaker refuse to remove the content, another speaker will be found or the program will be cancelled.

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

Any commercial support for a CPE program must be given directly to PPA. Funds received are allocated to expenses related to the program. At no point should funds ever be directly exchanged between the commercial entity and the speaker. Additionally, any contact whatsoever between the commercial entity and speaker is prohibited. The commercial entity is allowed no influence over program content, speakers, participants, or any other matters related to the CPE program.

Generally, PPA does not provide speakers with honoraria, but will reimburse travel expenses. These funds are paid to the speaker by PPA. (See Appendix F Speaker Reimbursement Guidelines)

Once commercial support is accepted, an agreement adhering to these principles shall be signed by both parties (See Appendix G Commercial Support Agreement). Many times, the commercial entity has their own version of this agreement, which PPA will accept if it meets or exceeds our standards.

If commercial support for a CPE program is received, the CPE Administrator will immediately inform the speaker of this agreement and again verify that no conflict exists. If a conflict becomes apparent, one of the three actions outlined above is taken.

PPA staff must review all final materials, handouts, and presentations to ensure that no bias, commercial message, or any references related to the commercial support have been inserted by the speaker.

### **Appropriate Management of Associated Commercial Promotion**

No table space, handouts, or advertisements may be provided in any circumstance in reference to commercial support received for a CPE program. A brief statement referencing commercial support is permitted, but no other recognition is tolerated.

Currently, commercial support is requested for only live, face-to-face CE programs. Commercial support for any other type of program (home study, webinar, etc.) is considered on a case-by-case basis and follows ACPE requirements regarding advertisements and promotions.

### **Content and Format without Commercial Bias**

PPA's CPE Administrator reviews all final materials, handouts, and presentations to ensure that no commercial bias or references have been included by the speaker. If the content is found to

biased, the CPE Administrator will work with the speaker to remove it, select another speaker, or cancel the program.

On occasion a speaker will include bias in the verbal portion of a presentation, with no indication in the materials, or worse, alter the materials after they have been approved. PPA has assigned moderators attending each program who are trained to recognize this and request the speaker to refrain from such content if observed. PPA also requests feedback related to any possible bias in the program evaluation. In the rare situation that bias is reported, PPA will issue an apology to all participants and explain that the content at issue was prohibited and should not be considered educational. The speaker(s) at fault will, under no circumstances, serve as a speaker for a future program provided by PPA.

### **Disclosures Relevant to Potential Commercial Bias**

PPA discloses information regarding both commercial support and faculty conflicts in many ways prior to the beginning of a CPE program.

- Included in advance brochure (if support has been received at this point) for conferences
- Included in conference program
- Announced by program moderator when introducing the speaker and outlining CE requirements
- Included in any PowerPoint presentation immediately following the title and objectives.

If there is no commercial support or faculty conflict to disclose, this is stated in the conference program and PowerPoints.

In the case of a CE offered outside of a conference, participants are made aware of any relevant relationships or commercial support a minimum of one time prior to the beginning of the program. The method of this disclosure differs based on the presentation type.