

# POLICY/PROCEDURE

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| TITLE: | **SPONSORSHIP FROM COMMERCIAL SOURCES OF ACCREDITED CONTINUING PROFESSIONAL DEVELOPMENT (CPD) ACTIVITIES** | ORIGINAL DATE:  **November 2017** | VERSION:  **1.0** |
| IDENTIFICATION NUMBER: | **OP 4041** | Last Review/ Revision Date: **August 2020** | Next Review Date: **August 2023** |
| HOSPITAL(S) | **All HMC Hospitals / Entities** | Sheet No. 1 of 12 | TRACKING HISTORY:  Sheet No: **12** |

## POLICY STATEMENT AND PURPOSE:

* 1. This policy outlines Hamad Medical Corporation (HMC) standards regarding the support of continuing professional development (CPD) activities or resources by commercial sponsors. Such activities or resources include but are not restricted to courses, seminars, conferences, workshops, journal clubs, hospital approved rounds, lectures, Internet courses, and the production of learning resources, e.g. CD-ROM or videotapes. Accredited activities and resources should be fair, balanced and free of commercial bias.

## Commercial interest shall 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 shall control the content of and registration of the educational activity
      5. Selection of educational methods
      6. Evaluation of educational activities
  1. This policy applies to all Hamad Medical Corporation accredited CPD educational events and to entertainment, exhibits and satellite symposia occurring at any such event.
  2. This policy complies with the accreditation requirements of the Qatar Council of Health Practitioners – Accreditation Department (QCHP-AD)

## DEFINITIONS:

* 1. **Accreditation (applies to Continuing Professional Development courses, events, educational resources)** the successful review of an educational activity or resources by the HMC Continuing Professional Development Steering Committee (HMC CPD SC) or their delegate. Upon accreditation, HMC CPD SC may assign QCHP-AD hours that shall be eligible for credits by QCHP.



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## Accredited Provider :

* + 1. A health professional organization or group, that plans, delivers and evaluates continuing education activities and has been recognized by an accrediting body (in Qatar the QCHP-AD). This definition excludes pharmaceutical companies and their advisory groups, medical and surgical supply companies, and communication companies.

## Approval:

* + 1. For the purposes of this policy, approval implies the successful review of an educational activity or resource by a peer review and/or educational standards committee.

## Continuing Professional Development (CPD) Activity

* + 1. A CPD activity is based on identified learning needs, has a purpose or objectives, and is evaluated to assure the learning needs are met. A CPD activity is distinct from a social event.

## Conflict of Interest:

* + 1. 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 should be recognized, disclosed and properly managed. For the purpose of this document, relevant potential conflicts shall be those from the past five years.
  1. **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.



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## Sponsors:

* + 1. 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 activity.

## Consulting:

* + 1. Consulting relationships include contractual relationships, advisory boards, speakers bureau, research and any relationship whereby the faculty member receives, or has the expectation to receive, income for services other than clinical or university work. This includes honoraria, commissioned papers, and fees for speaking, chairing and administration of meetings including in- kind considerations.

## Learner (Participant):

* + 1. Learners are participants whose learning needs have priority. Learners are responsible for identifying knowledge gaps, actively participating in filling them, and keeping track of their learning gains.

## Speakers Bureau:

* + 1. 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:

* + 1. 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 should not be accepted if specifically designated for hospitality purposes.



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## Scientific Planning Committee:

* + 1. The group of people tasked with developing the CPD activity and ensuring accreditation standards are adhered to.

## Satellite Symposia:

* + 1. These are separate meetings held in proximity (either spatially or temporally) to conferences and other CPD events. These are frequently produced by commercial interests, often without the restrictions of commercial sponsorship policies and guidelines.

## RESPONSIBILITIES:

## This policy is developed by HMC’s Department of Medical Education, headed by its Director, Dr Abdullatif Al Khal and the Associate Director for Undergraduate Education and CPD, Dr Margaret Allen. This revision/ update by Dr Margaret Allen. Dissemination, implementation and monitoring of staff compliance to this policy is by members of the Corporate CPD Committee, who represent all HCP sectors.

## PROCEDURE/PROCESS:

* 1. **Separating Education from marketing:**
     1. Health care professionals should maintain professional autonomy and independence in relation with commercial entities (e.g. Pharmaceutical companies, instrument and device manufactures).
     2. Acceptable commercial support should be distinct from activities intended to promote the marketing of a particular product.



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## Needs Assessment:

* + 1. Educational events should be planned to address the educational needs of the audience, whether that be students, trainees or health care providers. Faculty planners are responsible for the content, organization and financial arrangements of these events, **without influence from sponsors.**
    2. A comprehensive needs assessment should be conducted, ideally using multiple means of needs assessment to determine the perceived, misperceived and unperceived needs of their learners.
    3. The needs assessment should occur prior to any negotiation with potential commercial sponsors.

## Course Content, Objectives and Evaluation:

* + 1. Invitations to participate in planning for CPD activities should emanate from the CPD scientific planning committee (SPC), not from commercial sponsors. Course planners should choose course topics, learning objectives, learning methods and ensure decisions are made free of the influence of commercial interest.
    2. Evaluation mechanisms should contain questions that ask whether learners perceived commercial bias in the materials received from the presenters or authors.

## Selection of Topics and Speakers:

* + 1. As a condition of receiving funds or services, a CPD provider should 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.
    2. Travel arrangements, registration, expenses and honoraria should all be arranged and paid through event planners, and not through commercial sponsors or their agents.



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## Unbiased presentation of content:

* + 1. Presentations should give a balanced view of all available relevant therapeutic options available. In those circumstances where there is only one product, service or drug, a fair assessment should 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.
    2. It is prohibited to use the name or institutional logo of HMC in a manner that constitutes promotion of a commercial product (e.g. presentation slides).

## Direction of Funds:

* + 1. All funds from a commercial source should be in the form of an unrestricted educational grant to HMC. It is acceptable to designate an unrestricted educational grant to a specific CPD event.
    2. 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.
    3. Audit mechanisms should be established to assure compliance with HMC and national standards. Financial statements for each sponsored event should be available for audit by the departments, HMC Department of Finance, the HMC CPD SC, and commercial sponsors.

## Disclosures:

* + 1. Disclosure of commercial affiliations, sponsorships, honoraria, monetary support, contract research, and other potential conflicts of interest should be made to the participants in a CPD activity by HMC faculty, planning committee members and visiting speakers.



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* + 1. Faculty members should 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. (See OP 4011 Conflict of Interest Policy).

## Commercial Displays and Promotional Materials:

* + 1. Commercial displays and materials should be in a separate room from educational activities. A statement from the SPC to potential exhibitors and/or commercial sponsors should indicate that gift items cannot be distributed.
    2. 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 should not influence the planning or interfere with the presentation of the educational activity.
    3. Exhibitors and/or sponsors may not use Hamad Medical Corporation name or logo unless specifically approved by the HMC CPD Office.

## Satellite Symposia:

* + 1. Registrants may perceive such programs as integral to the accredited program and be unaware of commercial bias. Thus, conference planners should take care to ensure that:
       1. Registrants at the program shall be aware that such satellite symposia are not accredited by HMC or QCHP.
       2. Such activities shall be promoted (marketed or ‘branded’) in a way which clearly identifies the satellite activity as distinct from the accredited program;
       3. The satellite symposia shall be located in an area separate from HMC/ QCHP accredited program, and;



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* + - 1. The satellite symposia do not run concurrently with the accredited program.

## Social Events:

* + 1. 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 should not be in the control of or managed by commercial sponsors.

## Registration:

* + 1. **Registration fees:**
       1. Registration for accredited programs should be through HMC faculty member planners and not through an industry representative event planner service.
       2. A registration fee if applicable 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.

## Payment to Registrants:

* + - 1. Commercial sponsors may not provide or subsidize travel, lodging, honoraria, or personal expenses direct to practicing health professional attendees or their guests. For students, residents or fellows in accredited programs, commercial sponsorship for the participation of such learners may occur by contributing to a scholarship fund.



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* + - 1. 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.
      2. The corporate donor should always remain neutral in decisions regarding the specific allocation of such awards.
    1. **Sharing of Registrant Data –** Sponsors are not allowed to obtain the names or personal details of registrants from the SPC (see privacy policy).

## Gifts & Payments to Teachers:

* + 1. The planning committee may consider payment to faculty speakers for their participation at a CPD event. At the discretion of the SPC Chair, expenses incurred in making a presentation may be reimbursed, and small gifts are acceptable.

## Guest Faculty / Visiting Speakers:

* + 1. 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.

## Acknowledgements:

* + 1. Course directors may acknowledge commercial support as noted below. Advertising for commercial products by name or by indication is not permitted.



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## Course Brochures:

* + - * 1. 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 SPC members and speakers), the course objectives, or on the front of brochures. Educational grants are documented in course brochures under “Acknowledgements.”

## Posters, Flyers and One-Page Brochures:

* + - * 1. Acknowledgements may be listed at the bottom in a font not larger than the text of the brochure.

## Websites and other Electronic Formats:

* + 1. 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.
    2. Advertisements and promotional materials are not permitted on websites for CPD programs. “Pop-ups” are not allowed. Links should open a new window, leaving the educational site open in the background.
    3. 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 Hamad Medical Corporation/ QCHP is not responsible for the linked content.



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## Printed CPD Handouts or Syllabi, Advertisements, Promotional Material:

* + 1. Advertisement and promotional materials should 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 should be clearly marked as advertising or promotional content.

## Live Activities:

* + 1. Commercial displays and materials should 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.

## Sponsorship Agreements:

* + 1. There should be a signed agreement when any monetary or in-kind sponsorship is engaged in (Appendix 1) and this should be included in the application for CPD accreditation of the event.

1. **DOCUMENTIONS:** Not Applicable.

## REFERENCES:

**6.1** QCHP Accreditation Standards.

* 1. OP4071 Sponsorship by Pharmaceutical Companies.
  2. OP 4011 Conflict of Interest policy.
  3. Privacy and Confidentiality policy



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* 1. **ATTACHMENTS:**
  2. Appendix 1 Sponsorship Agreement Form.
  3. Appendix 2 HMC Sponsorship Procedure.

## 8.0 TRACKING HISTORY OF CHANGES:

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| --- | --- |
| **REVISION DATE:** | **CHANGES:** |
| 11/08/2020 | Replacement of Sponsorship Agreement Form to current version |
|  |  |
|  |  |

None

**SUBJECT MATTER EXPERT CONTRIBUTORS:**

**Department:**

**CPD Activity:**

**SPONSORSHIP AGREEMENT FORM**

**Sponsorship is financial or in-kind contributions from an organization that fits within the category of a commercial interest and that are used to pay for all or part of the costs of a CPD activity.**

**(A commercial interest is any entity producing, marketing, reselling, or distributing healthcare goods or services consumed by or used on patients, or an entity that is owned or controlled by an entity that produces, markets, resells, or distributes healthcare goods or services consumed by or used on patients. Nonprofit or government organizations, non-healthcare-related companies, and healthcare facilities are not considered commercial interests.)**

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| |  | | --- | | Note: Organizations providing sponsorship may not provide or co-provide a QCHP approved educational activity. They must not influence the agenda or the content. | |
| |  | | --- | |  | | Organization providing sponsorship: | | Total amount of sponsorship: | | All sponsorship must be Unrestricted (this is a strict QCHP rule)  Sponsors: Please initial that you understand this | |
| **NB The *SPC maintains responsibility for all decisions related to the activity as described below.*** |

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| **Terms and Conditions** | |
| 1. | This activity is for educational purposes only and will not promote any proprietary interest of an organization providing sponsorship. |
| 2. | The Approved Provider is responsible for all decisions related to the educational activity. The organization providing sponsorship may **not** participate in any component of the planning process of an educational activity, including:   * Assessment of learning needs * Determination of objectives * Selection or development of content * Selection of planners, presenters, faculty, authors and/or content reviewers * Selection of teaching/learning strategies * Evaluation methods |
| 3. | The Approved Provider will make all decisions regarding the dispositio**n** and disbursement of sponsorship. |
| 4. | All sponsorship associated with this activity will be given with the full knowledge and consent of the Approved Provider. No other payments shall be given to any individuals involved with the supported  educational activity. |
| 5. | Sponsorship will be disclosed to the participants of the educational activity. |
| 6. | The organization providing sponsorship may not exhibit, promote or sell products or services during the  introduction of an educational activity, while the educational activity takes place or at the conclusion of an educational activity, regardless of the format of the educational activity. |
| 7. | The Commercial Interest Organization will not recruit learners from the educational activity for any  purpose. |

OP 4041 Sponsorship from

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ommercial Sources of Accredited Continuing Professional Development (CPD**)** Activities

Regulatory, Accr ditation and Compliance Services (RA S)

**APPENDIX 1**

**Statement of Understanding**

An “X” in the boxes below serves as the electronic signatures of the representatives duly authorized to enter into agreements on behalf of the organizations listed and indicates agreement of the terms and conditions listed in the Sponsorship Agreement above.

|  |  |
| --- | --- |
| **Signature (Required) Date:** | |
| **Completed By:**  **(Name and Credentials)** |  |

|  |  |
| --- | --- |
| **Organization providing sponsorship:** | |
| **Address:** |  |
| **Name of Representative:** |  |
| **Email Address:** |  |
| **Phone Number:** |  |
| **Fax Number:** |  |
| **Signature Date:** | |
| **Completed By:**  **(Name and Credentials)** |  |

OP 4041 Sponsorship from Commercial Sources of Accredited Continuing Professional Development (CPD) Activities Regulatory, Accreditation and Compliance Services (RACS)



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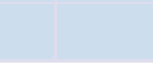
## APPENDIX 2

**PROCEDURE FOR MANAGING SPONSORSHIP OF HMC CPD EVENTS**

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Scientific Planning Committee

Determines whether external sponsorship

Sponsoring Entity

Reads and agrees to the terms and conditions of HMC Sponsorship Policy

CPD Event

Disclosure to participants of sponsprship

Ensures compliance with the agreement

Reviews feedback from participants

CP Scientific Planning Committee ‐ Chair

Compliance with the agreement

Signs the Sponsorship Agreement t Form

-Chair

required and extent

OP 4041 Sponsorship from Commercial Sources of Accredited Continui g Professional Development (CPD) Activities Regulatory, Accreditation and Compliance Services (RACS)

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