AUDIENCE QUESTIONS
We Can Do It! Getting Change-Ready Ahead of the ACCME's Updates to the Standards for Commercial Support

Is this only handling money from a sponsor or handling all monies?

Response: The proposed standards relevant to joint providership discussed money received from commercial support.

Do any of your industry grants have to go through OSP, office of sponsored projects?

Response: At our institution we have to send our grant checks to the Grant and Contract Services team of the Office of Research Administration. However, this team just oversees that the funds go into the correct project account. They do not otherwise oversee or manage the funds. This is done directly by the CME Department.

I'd like to know more about how you ascertain what is relevant? Even though it is laid out on the form, Faculty don't seem to understand how to make this determination so our process is to ask for ALL disclosures then make a determination via the CME committee.

Response: Most of us use a progression of questions to determine relevance. First, we look at the topic to see if it the content will be related to the products or business lines of any commercial interest. If the topic is leadership, or sometimes a discussion of technical skills, then it might not be possible to have a conflict of interest. Next, we look at the disclosures to see if the companies' products or business lines are related to the topic. We sometimes sent this question to physician volunteers but sometimes it's really obvious (aka a hernia lecture and the company makes mesh for hernias). It is reasonable to ask the individual if they have additional information about company or if they believe that it is relevant, but they do not get the make the final decision about relevance or management.

What happens when you have a small activity budget and your expert planner (not staff) is also your faculty... they are developing and presenting the content? They have relevant relationships. Is that a 'no go' so to speak?

Response: Organizations are required to manage relevant planner relationships differently than faculty. It's up to your individual organization to determine how to ensure independence is met. If it's reasonable to call yourself a planner and if you have the ability to ensure balance, that is one tactic. You can also consider adding another non-conflicted planner.

Your case talked about an owner, but it seems that faculty or planners with "ownership interests " are allowed. What is the threshold here?

Response: The ACCME is vague here. They have drawn the line at owner/employee but have also raised the red flag about "Founders," "CEOs," and others in management positions. We recommend you develop a policy that works for your organization.

I thought the new SCS change to disclosing All versus relevant?

Response: Yes, the new proposed standards require disclosing all financial relationships with "ineligible entities." These have not yet been finalized so we are not yet required to adhere to this standard.

For an org just launching a joint providership program, would you suggest that we launch assuming the new standard will be enacted/that we as the accredited provider should receive all funds directly?

Response: Make the decision based on what makes that best business sense for your organization