Standards for Commercial Support

1. **Independence:** Companies that provide external support in the form of an educational program grant are not to be involved in any aspect of program development including needs, learning objectives, content, faculty, format or delivery, and/or evaluation. A commercial interest cannot take the role of non-accredited partner in a co-sponsorship relationship.

2. **Resolution of Personal Conflicts of Interest:** It is the policy of the St. Louis College of Pharmacy Office of Continuing Education to provide balance, independence, objectivity, and scientific rigor in all individually sponsored or jointly sponsored educational programs. All co-sponsors and faculty participating in any St. Louis College of Pharmacy accredited program are expected to present balanced, non-biased information. They are also required to disclose to the accredited provider during the planning process and to the program audience any real or apparent conflict(s) of interest that may have a direct bearing on the subject matter of the pharmaceutical companies, biomedical device manufactures, or other corporations whose products or services are related to the subject matter of the presentation topic. The intent of this policy is not to prevent a co-sponsor or a speaker with a potential conflict of interest from conducting a program or making a presentation. It is intended that any potential conflict should be identified openly so that the potential conflicts are resolved to the satisfaction of the accrediting body early in the planning process. In addition, program participants will have full disclosure of the facts to make an informed judgment. St. Louis College of Pharmacy retains the right of final approval for all program faculty. St. Louis College of Pharmacy has the right to reject any proposed faculty member if it determines that a potential conflict of interest compromises the perceived balance of the intended audience. This decision will be made by the Director of Continuing Pharmacy Education (CPE) in consultation with the St. Louis College of Pharmacy CPE Committee. Any co-sponsor or faculty member that fails to disclose relevant relationships with a commercial supporter will be disqualified from current and future continuing education programming functions.

3. **Appropriate Use of Commercial Support:** St. Louis College of Pharmacy Office of Continuing Pharmacy Education will make all decisions regarding the disposition and disbursement of commercial support. A commercial supporter cannot designate or advise St. Louis College of Pharmacy Office of Continuing Education concerning the program faculty or content of the educational program to be developed. All commercial support associated with CPE activities must be given with the full knowledge and approval of the provider.
Written agreement documenting terms of support
The terms, conditions, and purposes of commercial support are documented in a written agreement between the commercial supporter that includes the provider and its educational partner(s) if appropriate. The agreement must include the provider, even if the support is given directly to the provider’s educational partner. The written agreement specifies the commercial interest that is the source of the commercial support. Both the commercial supporter and the provider sign the written agreement between the entities. St. Louis College of Pharmacy can review and edit all written agreements. All agreements with the College are signed by a Director of CPE designated as a signatory of the College.

Expenditures for an individual providing CPE
Planners, faculty and authors are paid directly for honoraria or for reimbursement of any out-of-pocket expenses by the provider, the joint sponsor, or the designated educational partner not by the commercial supporter. No other payments can be received by the director of the activity, planning committee members, teachers, authors, joint sponsor, or any others involved with the supported educational activity. Faculty or authors listed on the program agenda as facilitating or conducting a presentation session, but participating in the remainder of the educational activity as a learner, their expenses can be reimbursed and honoraria can be paid for the teacher author role only. Program faculty, authors, and speakers will be paid reasonable honoraria for the extent of involvement in the program and reasonable travel and lodging expenses in accordance with travel guidelines of St. Louis College of Pharmacy. St. Louis College of Pharmacy travel regulations require the submission of receipts for expenses to be reimbursed. St. Louis College of Pharmacy will reimburse reasonable travel and/or lodging expenses for each program faculty when appropriate. Use of a personal vehicle and daily subsistence is reimbursed at the standard St. Louis College of Pharmacy rates. Reasonable parking and transportation costs will be reimbursed at the actual cost. While St. Louis College of Pharmacy and/or the co-sponsor will develop the vast majority of educational materials for the program, reasonable out-of-pocket expenses for the educational program will be reimbursed if a proper receipt is submitted.

Expenditures for learners
Social events, exhibitors or meals at CPE activities cannot compete with or take precedence over educational events. The provider will not use commercial support to pay for travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of a CPE activity. The provider will use commercial support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, joint sponsor or educational partner.
Accountability
A detailed budget is created for each program. Accurate documentation will be kept describing the receipt and expenditures of commercial support for CPE activities.

4. **Management of Commercial Promotion:** Exhibits are not allowed in or directly outside the room where an educational program is presented. In addition, an egress must be available for participants to come and go to program rooms without being required to pass through any exhibit area. Educational materials may contain the name of the commercial sponsor but inclusion of promotional materials interleaved in the content is not permitted. This rule applies to printed materials, slides, computer materials and audiovisual resources. Reasonable promotional information that compliments and supports the educational content may be included at the very beginning or in the back of a printed lesson. St. Louis College of Pharmacy or its educational partners may not be paid any additional fees for including this promotional information. Representatives of the commercial sponsor may distribute invitations to potential participants to inform them of the program, but they are not allowed to distribute CPE lessons (e.g., home-study or arranging online access to online programming). They are strictly forbidden to help participants answer post test questions for any CPE resource.

5. **Content and Format without Commercial Bias:** Continuing pharmacy education consists of activities that serve to maintain, develop, or increase the knowledge skills, and professional performance and relationships that the intended health professional (pharmacist) uses to provide care to patients and service to the profession and the public.

Continuing pharmacy education does not include programming that promotes a specific proprietary interest of a commercial enterprise.

All presentations must be balanced, fair and equitable. Generic names should be used to describe drugs. Trade names may be used and are helpful to the participants when all generic and trade names are provided for a class or category of drugs under discussion. Providing only the trade names for a commercial supporter’s product is strictly prohibited.

6. **Disclosures Relevant to Potential Commercial Bias:** St. Louis College of Pharmacy and/or its education partners will disclose (including “in-kind”) commercial support and financial relationships to participants prior to the participant beginning the educational activity. No trade names or product messages can be included in the “disclosure” announcement. St. Louis College of Pharmacy requires that any individual or educational partner associated with the development of the educational program report either:
a) No relevant financial relationship exists; or
b) A relevant financial relationship exists. This disclosure should include: the individual’s name, the name of the commercial interest and the nature of the relationship.

All conflicts must be resolved by an effective peer review of content prior to the educational activity to ensure the content is valid and aligned with the interest of the public. Resolutions for conflicts of interest can include, but not limited to: choose another speaker; limit the content to report without recommendations; change the content so it does not relate to the conflict of interest; utilize peer review; and/or ask faculty to reference the “best available sources”. All resolutions of conflicts of interest must be documented.