



# Joint Providership Guidelines

Continuing Medical Education

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## Part 1: General Guidelines

### Application Process for Jointly Provided Activities

The Society of Hospital Medicine Continuing Medical Education program is pleased to consider requests to jointly provide a continuing medical education (CME) activity.

As a CME provider, we are only able to consider the request for joint providership when the requirements are met and the entire application has been submitted. SHM's partnership may be withdrawn at any point if the requirements are not met.

Once your activity has been approved, all recruitment materials are required to be reviewed by the Education Project Manager to ensure compliance with the ACCME, AMA and SHM CME requirements. Recruitment materials cannot be distributed or made available to the target audience until each piece has been approved by the CME Office.

Request for joint providership must be submitted to SHM with a completed Joint Providership Application at least four weeks before the distribution of publicity.

### Exhibitors

If you plan on selling exhibit space, a signed Agreement to Exhibit at a CME Activity must be obtained from each company participating as an exhibitor and submitted to SHM prior to the start of your activity. Exhibit fees must be uniform among all companies who choose to exhibit.

Whenever exhibitor materials are made available via exhibits, they must be educational in nature and devoid of company logos. Marketing and Sales Representatives are prohibited from attending educational events Jointly Provided by SHM.

Acknowledgement of exhibitors purchasing exhibit space must be disclosed to audience members via the CME Handout on the first day of the activity, if applicable.

### Faculty Financial Relationships

Anyone in the position to influence the educational content of your CME activity is required by the ACCME to complete and sign a Disclosure of Financial Relationships form. This includes, but is not limited to, course directors, activity planners, moderators and speakers. The purpose of this form is to list any relevant financial relationships the individual may have with a pharmaceutical company and/or medical device manufacturer.

All Disclosure of Financial Relationships forms must be submitted to SHM along with the Joint Providership Application.

All Financial Relationship, or lack thereof, must be disclosed to audience members on the first day of the activity. For examples of required disclosures, see Appendixes C and D.

### Evaluation Form

SHM will email learners a link to the activity evaluation from the SHM Learning Portal. All individuals requesting CME credit must be asked to evaluate your approved CME activity using the form available on the SHM Learning Portal. Not all attendees will complete the evaluation forms; a 100% response rate is not required.

### CME Certificates

After the learners complete their evaluation form, he/she/they will be able to retrieve their CME certificate from the SHM Learning Portal.

### CME Finances

The ACCME and Society of Hospital Medicine CME Office require that accurate and timely records of all financial transactions related to an approved CME activity be kept.

It is important that you communicate any and all financial information to your Member and Chapter Relations Coordinator.

## Part 2: Required Disclosures

The "Disclosure of Relationships" section is extremely important. Disclosures are required to be made to the audience using the exact same format regardless of whether a speaker has any relationships to disclose or not. In addition, off-label or investigational uses of products or devices must be noted. This data must reflect conflict of interest forms signed by the committee members, faculty and planners.

If you have questions, please contact the Education Project Manager to assist you with further disclosure material.

For examples of verbal or written disclosures, see Appendixes C and D.

## Part 3: Marketing CME Activities

As a provider of CME, the Society of Hospital Medicine (SHM) requires Joint Providers to submit all materials used for marketing purposes for review (following purposes). This is to ensure that the materials align with the Accreditation Council for Continuing Medical Education Criterion and Standards for Commercial Support. Guidelines for flyers and activity advertisement are detailed below. The faculty requirements for presentations are included in Part 4.

A separate list of presentation requirements is available in Part 4.

### Use of Accreditation and Credit Designation Statements

The SHM accreditation statement and the AMA's credit designation statement must appear on all distributed CME activity materials and brochures. Please copy and paste the below statements. These statements should remain in separate paragraphs as it is reflected below. Additionally, the *AMA PRA Category 1 Credit(s)*<sup>TM</sup> statement must always be italicized.

This activity has been planned and implemented in accordance with the accreditation requirements and policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint providership of the Society of Hospital Medicine and [\_\_\_\_\_]. The Society of Hospital Medicine is accredited by the ACCME to provide continuing medical education for physicians.

The Society of Hospital Medicine designates this live activity for a maximum of [\_\_\_\_\_] *AMA PRA Category 1 Credit(s)*<sup>TM</sup>. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

### Save the Date Announcements

The above statements are not required on save the date announcements provided that the announcements contain only general, preliminary information about the activity, such as the date, location and title. If more specific information is included, such as faculty and objectives, the statements must be included.

### Marketing an Event without CME Approval

If and when events have not been approved for *AMA PRA Category 1 Credit*<sup>TM</sup>, marketing materials must exclude any reference to CME including the abovementioned statements. The materials cannot state that *AMA PRA Category 1 Credit*<sup>TM</sup> is pending or has been applied for.

### The Use of Commercial Logos

Commercial logos are prohibited from all CME activity-related materials. Therefore, any handouts, including flyers, used for promotion of the activity or during the activity cannot contain advertising, corporate logos, trade names or product group messages of an ACCME-defined commercial interest. For more information, please refer to the ACCME's Standards for Commercial Support.

## Part 4: Activity Presentations

### Purpose of Requirements: Objectivity & Balance

The content and format of a CME activity or its related materials must promote improvements or quality in healthcare and not a specific proprietary business of a commercial interest. Presentations must give a balanced view of therapeutic options.

#### 1. Remain Impartial

Substitute trade names with generic product names unless products from multiple companies are used or the product is the only FDA-approved drug for the treatment or therapy being discussed.

Exclude advertising, logos, trade names and product group messaging from all educational materials, such as presentation slides, abstracts and handouts.

#### 2. Disclose Financial Relationships

Insert the provided SHM Disclosure at the beginning of your presentation and let this be displayed for at least 5 minutes prior to the beginning of the educational activity.

#### 3. Submit for Review

Submit to the Education Project Manager no later than 5 business days prior to the activity.

For examples of disclosure relationships, see Appendix C.

# Appendix A: SHM Policy for the Identification, Resolution and Disclosure of Conflict of Interest in the Creation of CME

## 1. Definition of Terms

### Ineligible Companies

Companies that are ineligible to be accredited in the ACCME System (ineligible companies) are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

Source: <https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce/eligibility>

### Financial Relationships

Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria for promotional speakers bureau, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected. ACCME considers relationships of the person involved in the CME activity to include financial relationships of a spouse or partner.

The ACCME has not set a minimum dollar amount for relationships to be significant. Inherent in any amount is the incentive to maintain or increase the value of the relationship.

With respect to personal financial relationships, contracted research includes research funding where the institution gets the grant and manages the funds and the person is the principal or named investigator on the grant.

Source: <https://www.accme.org/publications/tools-for-identifying-mitigating-and-disclosing-relevant-financial-relationships>

### Conflict of Interest (COI)

Circumstances create a conflict of interest when an individual has an opportunity to affect CME content about products or services of a commercial interest with which he/she has a financial relationship.

The ACCME considers financial relationships to create actual conflicts of interest in CME when individuals have both a financial relationship with an ineligible company and the opportunity to affect the content of CME about the products or services of that ineligible company. Top offer CME, the ACCME requires one to “[d]etermine

which financial relationships are relevant to the content of the continuing education activity, mitigate those relevant financial relationships to prevent commercial bias, and disclose the presence or absence of all relevant financial relationships to learners prior to the activity.”

With respect to financial relationships with ineligible companies, when a person divests themselves of a relationship it is immediately not relevant to conflicts of interest but it must be disclosed to the learners for 12 months.

Source: <https://www.accme.org/publications/tools-for-identifying-mitigating-and-disclosing-relevant-financial-relationships>

## 2. Procedure for the Identification of COI

A. Disclosure of Financial Relationships to SHM: SHM is committed to developing balanced, objective, scientifically rigorous continuing medical education that is free from the control or influence of commercial interests. Everyone who is in a position to control the content of a CME activity (e.g., planners, speakers, authors, etc.) must disclose all relevant financial relationships with an ineligible company to SHM by completing our Disclosure of Relevant Financial Relationships Form prior to the education activity being delivered to learners.

Individuals who refuse to disclose relevant financial relationships will be disqualified from being a planning committee member, a teacher or an author of CME, and cannot have control of, or responsibility for, the development, management, presentation or evaluation of the CME activity.

B. Identification of Conflict: SHM staff will review submitted Disclosure forms upon submission. Should a potential conflict of interest be identified, the individual will be contacted and asked for clarification or additional information. Should no conflict of interest be identified, the individual may be confirmed in his or her role in the activity. If relevant financial relationships are confirmed, staff will notify the full planning committee of the relevant financial relationship and provide links to the ACCME standards for commercial support: <https://www.accme.org/publications/accme-standards-for-commercial-support>

C. Staff will also initiate one of the below mechanisms for the resolution of conflict of interest was appropriate.

### 3. Mechanisms for the Resolution of Conflict of Interest

In the case a conflict of interest is identified with a course director, activity director or program chair responsible for developing an agenda and proposing presenting faculty, a review and feedback by the SHM Education Committee will be provided and in some instances peer review outside of the institution may be sought.

In the case a conflict of interest is identified with a faculty, author, speaker, planning committee member or any individual with control of the content of individual presentations, lectures and enduring online activities, the following mechanisms may be employed:

- A. The scope of the conflicted individual's role may be restricted so that he/she may no longer control the content or he/she may be asked to refrain from providing clinical recommendations within a given CME activity.
- B. An individual without a conflict of interest may replace the conflicted individual.
- C. Any content created by the individual will have to be reviewed by an independent party, including an SHM Education Committee member, SHM Hospital Quality & Patient Safety Committee member, SHM Board member and/or qualified SHM staff.
  - Reviewers will not have a relevant financial relationship with respect to educational content or CME activity.
  - If reviewers find bias in the content, the content will be removed or edited until the independent reviewer agrees that it is free of bias.
- D. If disagreement arises related to the nature of bias and the individual with a relevant financial relationship disagrees and is unwilling to edit content, content will be removed from the educational activity. The individual may be removed from the CME planning committee and/or activity creation, and all of that individual's content may also be removed if the independent party believes that content created is deemed inappropriate by the independent review.
- E. While not a mechanism to protect against bias, we do also utilize retrospective analysis: in all cases, final feedback related to the content and potential perceived commercial bias in individual presentations as well as the CME activity in general will be requested from learners immediately following the educational activity. Results may be shared with individual presenters, course directors and planning committee members.

### 4. Disclosure to Learners

Relevant financial relationships of those with control over CME content will be disclosed to learners prior to the continuing medical education activity in a "Disclosure Statement." When commercial support is "in-kind," the nature of the support must be disclosed as well.

For online enduring activities, this disclosure statement will appear as the front matter, requiring learners to mark a checkbox acknowledging they have read the disclosure. For live activities, a full list of Conflict of Interest data will be included in the program book and as the first slide of each speaker/author/presenter's presentation.

Disclosure statements will include: name of individual, name of commercial interest, and nature of the relationship and will be provided without trade names, logos, product messages or any similarly promotional type content.

## Appendix B: Disclosure of Relevant Financial Relationships for Any Individuals in a Position to Control the Content of an Educational Activity

The Society of Hospital Medicine (SHM) is accredited by the ACCME to provide CME for physicians.

Organizations accredited by the Accreditation Council for Continuing Medical Education (ACCME) are required to identify and mitigate for any bias resulting from financial relationships with ineligible companies by individuals in a position to influence and/or control the content of CME activities.

All individuals (faculty, authors, committee members, board members, staff, etc.) in a position to influence and/or control the content of CME activities are required to disclose to us and subsequently to learners: (1) any financial relationship(s) they have or have had with ineligible companies for 24 months prior to the activity, or (2) if they do not have a relevant financial relationship with an ineligible company. Failure to provide disclosure information in a timely manner prior to the individual's involvement will result in the disqualification of the individual from participating in the CME activity.

**Definition:** Ineligible Companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Examples of such organizations include:

- Advertising, marketing, or communication firms whose clients are ineligible companies
- Bio-medical startups that have begun a governmental regulatory approval process
- Compounding pharmacies that manufacture proprietary compounds
- Device manufacturers or distributors
- Diagnostic labs that sell proprietary products
- Growers, distributors, manufacturers or sellers of medical foods and dietary supplements
- Manufacturers of health-related wearable products
- Pharmaceutical companies or distributors
- Pharmacy benefit managers
- Reagent manufacturers or sellers

ACCME focuses on financial relationships with ineligible companies during the 24 months prior to the activity. There is no minimum financial threshold; we ask that you disclose all financial relationships, regardless of the amount, with ineligible companies. You should disclose all financial relationships regardless of the potential relevance of each relationship to the education. Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.

For SHM's full disclosure policy, please see the attached document titled "**SHM Policy for the Identification, Resolution Mitigation and Disclosure of Relevant Financial Relationships in the Creation of CME.**"

### Section 1: I have read SHM's disclosure policy and I declare the following:

- I have no relevant financial relationships with ineligible companies.
- I have the following financial relationships with ineligible companies within the last 24 months.  
(Please indicate the companies with whom you have a relationship and the nature of your role below.)



TYPE OF RELATIONSHIP	NAME of INELIGIBLE COMPANY (primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.)	What was RECEIVED? (employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.)	CLINICAL/ RESEARCH AREA	Is this relationship current?
Employee				
Consultant				
Advisor				
Speaker				
Royalties or Patent Beneficiary				
Executive Role				
Ownership Interest				
Research Grants/Contracts PI				
Other (please describe) _____				

**Section 2:**

Please read this section in its entirety and check the box below to affirm that you understand the importance of adhering to the CME Content Standards & Policies:

Definition of CME: Continuing medical education consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public, or the profession. The content of CME is that body of knowledge and skills generally recognized and accepted by the profession as within the basic medical sciences, the discipline of clinical medicine, and the provision of health care to the public.

- A. Accredited providers are responsible for ensuring that their education is fair and balanced and that any clinical content presented supports safe, effective patient care.
  1. All recommendations for patient care in accredited continuing education must be based on current science, evidence, and clinical reasoning, while giving a fair and balanced view of diagnostic and therapeutic options.
  2. All scientific research referred to, reported, or used in accredited education in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection, analysis, and interpretation.
  3. Although accredited continuing education is an appropriate place to discuss, debate and explore new and evolving topics, these areas need to be clearly identified as such within individual presentations. These topics must be presented without advocating for, or promoting, practices that are not, or not yet, adequately based on current science, evidence, and clinical reasoning.



4. Presentations must not promote recommendations, treatment, or manners of practicing healthcare that are determined to have risks or dangers that outweigh the benefits or are known to be ineffective in the treatment of patients.
- B. Accredited continuing education must protect learners from commercial bias and marketing.
1. All decisions related to the planning and presentation of accredited education must be made without any influence or involvement from the owners and employees of an ineligible company.
  2. Accredited education must be free of marketing or sales of products or services. Faculty must not actively promote or sell products or services that serve their professional or financial interests during accredited education.
- C. Accredited education requires that we disclose all relevant financial relationships to learners and it must include each of the following:
- The names of the individuals with relevant financial relationships.
  - The names of the ineligible companies with which they have relationships.
  - The nature of the relationships.
  - A statement that all relevant financial relationships have been mitigated.
  - Inform learners about planners, faculty, and others in control of content (either individually or as a group) with no relevant financial relationships with ineligible companies.
  - Identify ineligible companies by their name only. Disclosure to learners must not include ineligible companies' corporate or product logos, trade names, or product group messages.
  - Learners must receive disclosure information, in a format that can be verified at the time of accreditation, before engaging with the accredited education.
- D. Educational materials that are part of accredited education (such as slides, abstracts, handouts, evaluation mechanisms, or disclosure information) must not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.

## Appendix C: Disclosure of Financial Relationship (Handout/Slide)

I understand the importance of adhering to the CME Content Standards & Policies.

Agree     Disagree

I will provide the educational content and resources for independent peer review as requested by SHM staff or project leaders.

Agree     Disagree

I will not accept advice, services, content or edits from a commercial interest that will influence the content of this educational activity.

Agree     Disagree

I will only accept support for my role in this activity from SHM staff, including honoraria, transportation, lodging and any other remuneration.

Agree     Disagree

The information I provide on this form will be made known to the planners and participants of the educational activity.

Agree     Disagree

### Section 3:

I hereby accept the invitation to participate as: (Check all that apply.)

Faculty     Author     Staff     Planning Committee Member  
 Committee Member (which one? \_\_\_\_\_)     Editorial Group/Board     Other \_\_\_\_\_

I have carefully considered each item and have answered all of these attestations to the best of my knowledge.

Signature \_\_\_\_\_

Print Name \_\_\_\_\_ Date \_\_\_\_\_

## Example)

### Course Director

[John Smith, MD]

- Speakers Bureau: Pfizer
- Will not discuss off-label or investigational use of products

### Course Co-Director (if applicable)

[Jennifer Smith, MD]

- Nothing to disclose
- Will not discuss off-label or investigational use of products

### Independent Clinical Reviewer (if applicable)

[Sarah Jones, MD]

- Nothing to disclose
- Will not discuss off-label or investigational use of products

### Faculty

[Peter McDonald, MD]

- Nothing to disclose
- Will not discuss off-label or investigational use of products

[Marilyn Johnson, MD]

- Speakers Bureau: Astra Zeneca
- Research Support: Lilly Oncology and Amgen
- Consultant: Bristol Myers Squibb
- Will not discuss off-label or investigational use of products

### Planning Committee

[Joseph Brown, MD]

- Nothing to disclose
- Will not discuss off-label or investigational use of products

[Lisa Jones, MD]

- Speakers Bureau: Astra Zeneca
- Research Support: Merck
- Consultant: Bristol Myers Squibb
- Will not discuss off-label or investigational use of products

### Course Coordinator

[David Smith, MPH]

- Nothing to disclose
- Will not discuss off-label or investigational use of products

## Appendix D: Verbal Disclosure Script

**Instructions: Read the following script to the audience prior to the activity.**

If there are no conflicts of interest for all planning committee members and speakers:

All planning committee members and speakers have declared there are no relative financial arrangements or affiliations with the organization that may affect balance, independency, objectivity or scientific rigor for this CME activity.

If there are conflicts of interest for any planning committee members and speakers:

During the planning stages of this activity, some of the planning committee members and/or faculty have declared a relative financial arrangement and/or affiliation with an organization that could affect a balance, independency, objectivity or scientific rigor for this CME activity.

*(Planning Committee Member/Speaker) reports a conflict of (define nature of relationship) with (commercial interest). (Describe resolution that took place). (repeat as needed)*

All other planning committee members or speakers have declared there are no relative financial arrangements or affiliations with a commercial interest.