

8.0 Relevant Financial Relationships and Conflicts of Interest

Conflicts of interest (COI) in CPE arise when individual financial relationships relevant to the CPE content compromise or have the potential to compromise professional judgment and / or impart bias into the CPE content.⁴ Relevant financial relationships shall be disclosed. A financial relationship is relevant if the CPE content that an individual influences, controls, contributes to, or presents relates to business lines, products, services, or commodities that may contribute to that individual's financial or professional gain.⁵

8.1 Collection of Disclosure Information

It is the responsibility of the Accountable Contact to collect information regarding relevant financial relationships and declarations of conflicts of interest. All individuals who influence, control, contribute to, or present CPE content must disclose relevant financial relationships and conflicts of interest to the Accountable Contact to facilitate disclosure to learners.

Roles can include but are not limited to:

- CPE staff
- Planners
- Developers
- Reviewers
- Faculty
- Accountable Contacts

Individuals must disclose all financial relationships occurring within the prior 24 months, regardless of the amount.⁵

Disclosure information must include:

- The name of the company or organization with which the individual has a financial relationship⁵
- The nature of the financial relationship⁵
- Declaration of conflicts of interest or lack thereof

Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted researcher), royalties or patent beneficiary, executive, person with ownership interest, and recipient of in-kind products. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.⁵

8.2 Disclosure of Conflicts of Interest to Learners

Transparency in CPE is dependent on learner awareness of conflicts of interest or lack thereof by those who influence, control, contribute to, or present CPE content.

Individual conflicts of interest must be disclosed to learners prior to the beginning of the CPE activity, prior to learners' engagement in CPE content. Disclosures of conflicts of interest must be located on the first slide, page, or image following the title slide, page, or image. Learners shall be informed when no conflicts of interest exist. See Policy 9.5 Disclosure of Commercial Support and Policy 10.2 Disclosure of Funding for information regarding other required disclosures.

8.3 Retention of Disclosure Information

Disclosure information must be retained for seven years following the expiration of a CPE activity. Providers shall make individual disclosures of relevant financial relationships available to learners and / or CDR staff upon request.

9.0 Commercial Support

CDR defines commercial support as financial or in-kind support from entities external to the Provider that manufacture, distribute, sell, resell, or promote business lines, products, services, or commodities. Commercial support shall not be utilized in any capacity which influences, controls, contributes to, or impacts CPE content. Providers who choose to accept commercial support must ensure that the CPE content remains independent of the supporter and that the support does not result in commercial bias or influence on CPE content.⁶

9.1 Commercial Support Agreement

The terms, conditions, purposes, and amount of the commercial support must be documented in an agreement between the supporter and the CPE Provider. See Policy 9.4 Documentation of Commercial Support for a list of required information. The agreement must be executed prior to the start of the CPE.

9.2 Management of Commercial Support

The Accountable Contact must manage all commercial support used to pay all or part of the costs associated with the CPE. The CPE Provider must make all decisions regarding the receipt, allocation, and disbursement of funds received. Disbursement of funds must come from the CPE Provider, not the supporter.

9.3 Guidelines for Use of Commercial Support

The CPE Provider may use commercial support to⁶:

- Fund honoraria or travel expenses of planners, reviewers, faculty, teachers, authors, and others involved in CPE content
- Pay for meals for all learners before or after CDR Prior Approved non-enduring CPE activities
- Defray or eliminate the cost of CPE for all learners

The CPE Provider may not use commercial support to⁶:

- Pay for travel, lodging, honoraria, gifts, or other expenses for learners participating in CDR Prior Approved CPE
- Influence, control, contribute to, or impact CPE content

9.4 Documentation of Commercial Support

As a component of the annual report, the Accountable Contact must produce accurate and detailed written documentation of:

- Names and contact information for organizations that provided commercial support
- Dollar amount received from each organization
- Monetary value and description of in-kind support received
- Description of how commercial support was used

9.5 Disclosure of Commercial Support

The name(s) of the organization(s) contributing financial and / or in-kind support must be disclosed to learners in CPE marketing and prior to the beginning of the CPE activity, prior to learners' engagement in CPE content. Disclosure of commercial support must be located on the first slide, page, or image following the title slide, page, or image. Disclosure must not include the supporters' logos, trade names, or product group messages or images.⁶ The supporters' logos, trade names, or product group messages or images shall not appear in CPE content, as outlined in Policy 7 Marketing and Commercial Bias in CPE.

Required language: "Commercial support has been provided by [name of commercial supporter]."

10.0 Funding

CDR defines funding as revenue generated by the Provider (or affiliated parent or sister companies) from the manufacture, distribution, sale, resale, or promotion of non-CPE business lines, products, services, or commodities, which is utilized in the planning, development, review, and presentation of CPE.⁷ Funding, including monetary or in-kind support, shall be disclosed. Funding shall not result in commercial bias.

10.1 Documentation of Funding

As a component of the annual report, the Accountable Contact must produce accurate and detailed written documentation of:

- Names and contact information of organizations that provided funding
- Dollar amount received from each organization
- Monetary value and description of funding received
- Description of how funding was used

10.2 Disclosure of Funding

The names of entities (e.g. parent or sister companies) that contribute funding from non-CPE revenue to CPE planning, development, review, and presentation must be disclosed to learners in CPE marketing and prior to the beginning of the CPE activity, prior to learners' engagement in CPE content. Disclosures of funding must be located on the first slide, page, or image following the title slide, page, or image. Disclosure must not include the funders' logos, trade names, or product group messages or images.⁵ The funders' logos, trade names, product group messages or images shall not appear in CPE content, as outlined in Policy 7 Marketing and Commercial Bias in CPE.

Required language: "Funding from non-CPE revenue for CPE planning, development, review, and / or presentation has been provided by [name of funder]."

11.0 Inclusion, Diversity, Equity, and Access (IDEA) in CPE Planning, Development, and Presentation

Providers shall utilize resources and incorporate processes that enable those who influence, control, contribute to, present, or participate in CPE content to examine explicit (conscious) and implicit (unconscious) biases, assumptions, privileges, and language. Established models, theories, and frameworks⁸ shall be utilized in the planning, development, and presentation of CPE to effectively promote inclusion, diversity, equity, and access.

IDEA in CPE applies to:

- Planners, reviewers, faculty, authors
- Content
- RD/DTR learners
- Patients, clients, customers

CPE that promotes diversity and inclusion is developed and presented to recognize, respect, and include differences in ability, age, creed, culture, ethnicity, gender, gender identity, political affiliation, race, religion, sexual orientation, size, and socioeconomic characteristics.⁹

CPE that promotes equity and access acknowledges historical and institutional inequities.

CPE is a safe space when approached with cultural humility and an openness to the cultivation of cultural competence. Beliefs, experiences, identities, and differences in abilities, age, size, socio-cultural / socio-economic characteristics, and political affiliations are considered and respected.