



## **CME GRANT APPLICATION PROTOCOL**

### **For Limited Registration & Certification Only CME Activities**

#### **FREQUENTLY ASKED QUESTIONS (FAQs)**

##### **Who is the CME Provider?**

The official CME Provider is the University of Rochester School of Medicine and Dentistry.

*Please Note:* Grant checks can be made payable to the department presenting the activity, but the CME provider should be the University of Rochester School of Medicine and Dentistry.

##### **What is the University of Rochester's certification statement?**

*Certification Statement:* The University of Rochester School of Medicine and Dentistry is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

##### **Who is the Educational Partner?**

If the University of Rochester partners with an external organization to present the CME activity (i.e. Non-profit organization, clinical agency, etc.) the organization would be considered an educational partner and named on the Letter of Agreement (LOA).

##### **Why is maintaining compliance to ACCME's Standards for Commercial Support necessary?**

The University of Rochester is committed to providing high-quality medical education and upholding its status as an accredited provider of CME activities. In order to do so, it is important to ensure separation between industry and medical education. All educational events sponsored by URMC and its schools, centers, departments, or departmental divisions must be compliant with the ACCME Standards for Commercial Support (SCS).

It is also the policy of URMC to adhere to the highest ethical standards and legal requirements, to avoid conflicts of interest, improper relationships and other interactions with Industry that may suggest the appearance of a conflict of interest or an improper relationship. Individuals must consciously and actively separate clinical care decisions from any perceived or actual benefits expected from any company. It is unacceptable for patient care decisions to be influenced by the possibility of personal financial gain.

##### **Who is authorized to sign Letters of Agreement?**

IIE staff must be aware of all educational grants and are authorized to sign Letters of Agreement.

##### **Which Letter of Agreement should be signed? (URMC or Commercial Interest?)**

If a Commercial Interest has their own letter of agreement and it meets the requirements of the ACCME, that letter should be signed. If a Commercial Interest does not provide a letter of agreement, the IIE letter should be used.

### **Can a Commercial Interest pay directly for a conference expense?**

No, a Commercial Interest may not pay directly for any conference expense. The Commercial Interest may provide a check or other payment method which the provider will use to pay directly for the expense.

### **What can I or cannot use Commercial Interest funds for?**

It is important to check both the Commercial Interest's guidelines and the ACCME SCS to confirm how Commercial Interest funds may be used.

*ACCME SCS indicates the following about Commercial Interest funds (Standard 3.12):*

- May not be used for "travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of a CME activity. The provider may use commercial support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, joint provider or educational partner."

Commercial Interest guidelines vary so it is important to review guidelines and policies thoroughly. Some Commercial Interests may choose not to support: Honoraria, meals, and travel costs. **Please note that these items as well as other items of value are reportable under [The Physician Payments Sunshine Payment Act](#).**

### **What are acceptable/unacceptable ways that Commercial Support may be disclosed?**

It is required by the ACCME that all support from Commercial Interests be disclosed to attendees. There are multiple ways in which Commercial Interests may be disclosed. Please see below for a few examples of acceptable and unacceptable methods of disclosure.

#### **Acceptable**

- ✓ Commercial Interest name on course website as educational grant provider
- ✓ Commercial Interest name on opening PowerPoint as educational grant provider
- ✓ Commercial Interest name listed on a Support Statement on a brochure or syllabus with other grant providers

**Please note:** It is strongly recommended that you review company's Letter of Agreement for other specific disclosure requirements.

#### **Unacceptable**

- X Commercial Interest logo, trade name, or slogan on any educational or CME promotional materials, including:
  - Agenda
  - Educational presentation slide
  - Activity description

### **How do I know if a company that I am requesting grant funds from is a Commercial Interest?**

If the company fits this description: "entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients". The large majority of Pharmaceutical and Medical Device Companies are Commercial Interests. *[ACCME provides additional guidance in its FAQ.](#)*

**What sources of revenue are not categorized as Commercial Interests?**

Nonprofit, foundation, non-healthcare companies, and governmental organizations are not Commercial Interests. If you are unsure that your revenue source is a Commercial Interest, please contact our office directly.

**What if a Commercial Interest is providing both grant support and exhibit display fee?**

Some companies may opt to provide both grant support and pay for exhibit space. Please remember to treat these two as separate business transactions. Companies CANNOT receive exhibit space as a condition or benefit of providing grant support.

**When can I disclose/publically acknowledge the grant funding?**

Grant funding may be disclosed after a fully executed letter of agreement is received.

**Can a Commercial Interest representative that approves my grant attend the CME event?**

Grant providers that are Commercial Interests may be permitted to attend with the understanding that they will act as “silent observers”, cannot promote their company/ product, and won’t be able to claim CME credit (separate fee applies).

**What documentation does IIE require to review my grant?**

*In order to review your grant application draft, the following documents are required before you submit the grant:*

- ✓ Completed IIE grant review form
- ✓ Completed and approved CME application (received from Activity Director)
- ✓ Signed Certification Letter & Addendum to Commercial Support (received from Activity Director)
- ✓ Full grant application materials that will be submitted to the Commercial Interest. Provide information about the application guidelines and grant deadline.

*In order for our institution to accept the grant award, the following documents are required after you submit the grant and receive confirmation of its approval:*

- ✓ Award notice
- ✓ Fully executed Letter(s) of Agreement
- ✓ Planned methods of disclosure to learners
- ✓ Post-activity reports for grants (if required)

**Why does my grant application have to be reviewed prior to submission?**

ACCME requires that an Accredited Provider be aware of any funds received by its institution from Commercial Interests for CME activities. IIE staff review grants in order to ensure that our institution is aware of any grants submitted and received for CME activities, and we also review the grant materials for compliance to the ACCME Standards for Commercial Support. IIE also has to report annually to the ACCME any commercial support received by our institution.

Additional questions related to Commercial Support (Compliance & Grants) may be directed to [IIEGrants@URMC.rochester.edu](mailto:IIEGrants@URMC.rochester.edu).

Additional questions related to Accreditation and Certification may be directed to [CMEEcertification@URMC.rochester.edu](mailto:CMEEcertification@URMC.rochester.edu).