

Baystate Health  
Office of Continuing Education  
Holyoke, MA 01040

**SUBJECT: Commercial Support**

***Policy***

The design and content of Baystate Health CE activities support quality improvement in healthcare and provide fair and balanced views of therapeutic options. Continuing education (CE) activities sponsored by Baystate Health are provided without influence by any commercial interests.

A **commercial interest** is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Baystate Health - in keeping with the ACCME/ANCC definition of commercial interest does not consider providers of clinical service directly to patients to be commercial interests.

***Purpose***

To be in compliance with the Accreditation Council for Continuing Medical Education (ACCME) and American Nurses Credentialing Center (ANCC) criteria.

***Scope***

All educational activities provided or co-provided by Baystate Health OCE for which commercial support has been received

***Procedure***

Baystate Health maintains control of the educational content and disclose to the learners all financial relationships or lack of, between the commercial supporter and the provider and presenter(s). This includes the following:

1. Decisions made free of the control of a commercial interests include but are not limited to
  - (a) Identification of CE needs and professional practice gaps;
  - (b) Determination of educational objectives;
  - (c) Selection and presentation of content;
  - (d) Selection of all persons and organizations that will be in a position to control the content of the CE;
  - (e) Selection of educational methods;
  - (f) Evaluation of the activity.
2. Funds from a commercial source are in the form of an educational grant to the provider of the education activity and will be acknowledged in printed materials and brochures.
3. Arrangements for commercial exhibits will not influence the planning of, or interfere with, the presentation of the educational activity.
4. Learners will be made aware of the nature of all commercial support of all education activities.
5. Education activities are distinguished as separate from endorsement of products. When commercial products are displayed, participants will be advised that approved status as a provider refers only to its continuing education activities and does not imply ANCC Commission on Accreditation or MARN endorsement of any commercial products.
6. Education activities that present research conducted by commercial companies will be designed and presented with scientific objectivity.
7. Learner will be informed of an off-label use of a commercial product that is presented in education activities.

Baystate Health does not permit a commercial interest to take the role of non-accredited partner in a joint sponsorship relationship.

**STANDARD 2: Resolution of Personal Conflicts of Interest**



Verification that disclosure of relevant (or no) financial relationships was made to learners prior to the beginning of the activity (C7; SCS 6.1-6.2, 6.4-6.5)

Baystate Health makes all decisions regarding the disposition and disbursement of commercial support.

Baystate Health and its designees cannot be required by a commercial interest to accept advice or services concerning teachers, authors, or participants or other education matters, including content, from a commercial interest as conditions of contributing funds or services.

All commercial support associated with a CE activity must be given with the full knowledge and approval of the Baystate Health, Office of Continuing Education

**Written agreement documenting terms of support**

The terms, conditions, and purposes of the commercial support must be documented in a written agreement between the commercial supporter and Baystate Health, Office of Continuing Education.

All commercial funds in support of Baystate Health's continuing education activities must be deposited in the Office of Continuing Educational fund.

The written agreement must specify the commercial interest that is the source of commercial support.

Both the commercial supporter and the Baystate Health, Office of Continuing Education designee must sign the written agreement between the commercial supporter and Baystate Health.

The use of funds in support of Baystate Health continuing education activities must be consistent with the policy regarding honoraria and reimbursement of out-of-pocket expenses for planners, teachers and authors.

**Baystate Health will employ Appropriate Use of Commercial Support**

Baystate Health will pay directly any teacher or author honoraria or reimbursement of out-of-pocket expenses in compliance with Baystate Health's written policies and procedures. No other payment shall be given to the director of the activity, planning committee members, teachers or authors, joint sponsor, or any others involved with the supported activity.

**Expenditures for learners**

Social events or meals at CE activities cannot compete with or take precedence over the educational events.



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Joanna Barnett, MBA, RN  
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