

CEPD Ethics Policy: Sponsorship and Exhibition

Approval Authority: CEPD Governance Committee

Established On: 2024 05 10

Amendments: 2024

1.0 POLICY STATEMENT

This Policy is intended to safeguard the independence and integrity of accredited Continuing Professional development (CPD) and Faculty Development (FD) activities from affiliations that could lead to real or perceived bias in educational content. This policy incorporates the CPD [ethical review process of the College of Family Physicians of Canada](#) (CFPC), the [ethical standards of the Royal College of Physicians and Surgeons of Canada](#) (RCPSC), and is based on the Elements outlined in the [National Standard for support of accredited CPD activities](#).

This policy is based on the premise that all CPD activities that are accredited through the NOSM University CEPD Office must be:

- Trustworthy
- Based on scientific evidence and best practices
- Based on the needs of physicians and other health care providers in northern Ontario and the communities that they serve

The CEPD office endeavours to ensure that CPD and FD activities, accredited through the CEPD Office, present learners with accurate, balanced, and scientifically-based recommendations, while protecting learners from promotion, marketing and bias.

2.0 SCOPE

This policy should be used when developing sponsorship agreements and other support of continuing professional development activities accredited or certified by the NOSM University CEPD Office. This policy should be used in conjunction with the CEPD COI Policy where applicable.

Using this Policy:

For any NOSM U CEPD accredited/certified CPD activity, the accountable [physician organization](#) and their appointed [Scientific Planning Committee \(SPC\)](#) is responsible for compliance with the CEPD Ethics Policy. [Descriptions and resources are located in the CEPD Program Development Toolbox.](#)

This policy is organized into five elements:

1. Independence
2. Content Development
3. Conflicts of Interest
4. Financial and In-Kind Support
5. Unaccredited Activities (in conjunction with an accredited activity)

Elements 1-3 apply to all accredited CPD activities. These elements create an accountability structure to ensure external interests, whether commercial or otherwise, do not unduly influence CPD activities.

Elements 4-5 apply to accredited CPD activities with commercial sponsorship. These elements cover the specific rules in place to ensure commercial sponsors do not unduly influence CPD activities.

3.0 DEFINITIONS

For the purposes of this policy:

Accreditation (Certification) (Applied to CPD/FD activities, modules, and educational resources):

The CFPC and RCPSC use different terminology to describe successfully meeting the administrative, educational and ethical standards set by each College in the development of Continuing Professional Development (CPD) and Faculty Development (FD) educational activities. The universal terminology, and the terminology used by the RCPSC is **accreditation**, while the CFPC refers to the same process as **certification**.

For the purposes of this policy, accreditation refers to the successful review of an educational activity or resource by the CEPD Office, resulting in accreditation (RCPSC) or certification (CFPC) of the activity.

For an activity to be accredited, program planners will have demonstrated alignment with the CFPC and/or RCPSC administrative, educational, and ethical standards. Upon accreditation, the CEPD Office may assign 'certified' Mainpro+ credits of The College of Family Physicians of Canada (CFPC), and 'accredited' Maintenance of Certification (MOC) Section 1 and 3 learning hours of the Royal College of Physicians and Surgeons of Canada (RCPSC).

Accredited Provider:

An entity with the authority to grant Continuing Professional Development (CPD) credits by virtue of having undergone an accreditation process of a duly constituted authority including the Committee on Accreditation of Continuing Medical Education (CACME) and the Royal College of Physicians and Surgeons of Canada (Royal College).

(Educational) Activity:

An educational offering that is part of the Continuing Professional Development (CPD) provider organization's overall programming or one for which the CPD provider organization grants credit(s). **Note that CPD and educational activity may be used interchangeably.

Approval:

For this policy's purposes, approval implies the successful review of an educational activity or resource by a peer-review process.

Continuing Professional Development Activity:

An educational activity that has a clinical focus which may incorporate faculty development, and is based on identified learning needs, has learning objectives, and is evaluated to assure the learning objectives are met. A CPD/educational activity is distinct from a social event. **Note that CPD and educational activity may be used interchangeably.

Conflict of Interest (COI):

A condition or set of conditions in which judgement or decisions concerning a primary interest is unduly influenced or could be perceived to be unduly influenced by a secondary interest (personal or organizational benefit including financial gain, academic or career advancement, or other benefits to family, friends, or colleagues). For more detailed information, refer to the CEPD COI Policy.

Perceived Conflict of Interest: The appearance of a conflict of interest regardless of whether an actual conflict of interest exists.

Real Conflict of Interest: A circumstance when two or more interests are indisputably in conflict.

Healthcare/Pharmaceutical Industry (HPI):

Commercial entities that develop, produce, market, resell, or distribute drugs, devices, products, or other healthcare goods, services, or therapies that may be prescribed to patients or ordered by physicians or other regulated health professional, in the diagnosis, treatment, monitoring, management, or palliation of health conditions. Examples include (but are not

limited to): Pharmaceutical companies, medical device companies, medical and surgical supply companies, producers of non-prescription healthcare products, nutrition companies (infant formula, nutritional supplements), pharmacies; diet, fitness, and weight-loss companies; prosthetic and orthotic stores; hearing test centres; home care companies; etc., or clinical services that are owned or controlled by any of the above entities. *(From CFPC Understanding Mainpro+ Certification 2021)*

Participant:

A person enrolled in a CPD activity, whose learning needs have priority. Participants are responsible for identifying their own gaps in knowledge, skill or attitude, actively participating in filling them, and keeping track of their learning gains.

Peer Selling:

Peer selling occurs when a pharmaceutical or medical device manufacturer or service provider engages a physician or other regulated health professional, to conduct a seminar or similar event that focuses on its own products and is designed to enhance the sale of those products. This also applies to third party contracting on behalf of industry. This form of participation would reasonably be seen as being in contravention of the Canadian Medical Association (CMA) Code of Ethics, which prohibits endorsement of a specific product.

Physician organization (RCPSC term):

A **not-for-profit group of health professionals** with a formal governance structure, accountable to and serving, among others, its CFPC and RCPSC physician members through continuing professional development, provision of health care, and/or research. Examples may include but are not limited to: departments within a hospital or university, or Local Education Groups.

CPD Provider Organization (CFPC Term):

assumes responsibility and accountability for the development, delivery, and evaluation of Mainpro+ certified CPD activities. The CPD provider organization must form a scientific planning committee—independent of sponsor influence—to conduct this work.

Sponsor:

A company, organization, institution, government agency or other entity (for-profit or not-for-profit) that contributes financial or in-kind resources to a CPD course or other activity.

Unrestricted Educational Grant:

Financial sponsorship that is payable to the scientific planning committee or physician organization planning the activity, with no stipulations attached such as selecting faculty, authors, participants, aligning sponsorship to a particular session or speaker, or any other matters related to the content. All sponsorship funds should be received as an unrestricted educational grant.

4.0 POLICY TERMS OR PROCEDURES**4.1 Element 1: Independence**

This element describes the membership, roles, responsibilities, exclusions, and decision authority of a scientific planning committee (SPC).

4.1.a Every CPD activity must be developed by a planning committee that is, or is accountable to, a [physician organization](#) or CPD provider organization who has ultimate decision-making authority and accountability, including decisions related to finances. The SPC, physician organization or CPD provider organization must make all decisions regarding the receipt and disbursement of all funds in line with the CEPD Ethics Policy. Only a SPC, physician organization or CPD Provider may seek accreditation. No one individual may hold financial or other

responsibility for decisions of the SPC, Physician organization or CPD provider organization.

4.1.b Every CPD activity must have a scientific planning committee (SPC), accountable to and overseen by a fiscally responsible physician organization. The SPC is responsible for ensuring the education activity and its content is evidence-based, balanced and unbiased. The SPC must follow the CEPD Ethics Policy to ensure that the CPD activity is not used to promote or sell products or services that serve any form of professional or financial interests, including their own.

4.1.c The SPC must have a NOSM University faculty or preceptor as the Chair of the committee and must (i) include at least two physicians (must be representative of the College(s) the planning committee seeking accreditation for, per the intended target audience) and (ii) be representative of the target audience. Members must be aware of their responsibilities pertaining to accreditation/certification standards. The SPC must have an agreed upon decision-making process to enable it to fulfill its responsibilities.

SPC Responsibilities include:

- a) Identification of the educational needs (gaps in knowledge, skill, or attitude) of the intended target audience;
- b) Development of learning objectives for the activity and each session;
- c) Selection of educational methods;
- d) Selection of SPC members, speakers, moderators, facilitators and authors;
- e) Review of COI Declarations made by SPC members and speakers
- f) Development and delivery of content;
- g) Evaluation of outcomes
- h) Oversight of logistical planning
- i) Initial outreach to potential sponsors and to ensure alignment of all sponsorship with ethical standards.

- 4.1.d** The SPC must identify and address instances of non-compliance with the CEPD Ethics Policy. The SPC must have a procedure for addressing areas of potential or real COI or bias, or non-compliance; where no other procedure exists, the CEPD Escalation Process (see Appendix) may be used. The SPC must inform the NOSM U CEPD Office should any compliance issues arise.
- 4.1.e** Representatives of a sponsor, any organization hired by a sponsor, or healthcare/pharmaceutical industry commercial interest (HPI; see Element 3 for definition) cannot assume the role of a facilitator, speaker, and/or instructor for any accredited program under any circumstances.

4.2 Element 2: Content Development

This element describes the processes and requirements for the SPC and speakers to develop content that is responsive to the needs of the intended target audience, balanced, and evidence based.

- 4.2.a** The SPC must complete a needs assessment process to identify the gaps in knowledge, skill or attitude of the intended audience and based content developed on those identified needs. **Interests of any sponsor must have no direct or indirect influence on the content or development of the activity.
- 4.2.b** The SPC must ensure that all recommendations for patient care are based on evidence, current science and best practice guidelines, and clinical reasoning. Content must be balanced with respect to diagnostic and therapeutic options.
- 4.2.c** The SPC must have a process for informing presenters, authors, instructional designers, and others involved in content development of:
- a) the identified needs of the intended target audience
 - b) the need to ensure that all content and educational material is balanced across all relevant options related to the content area

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- c) the intended learning objectives for the session (derived from the needs, and matched to the educational format, written from the learner's perspective, actionable and measurable, and must describe the intended outcome NOT what will be presented in the session)
 - d) the requirement that the description of therapeutic (pharmaceutical) options utilize generic names (or both generic and trade names where necessary) and must not reflect exclusivity and branding.
 - e) declare any off-label use when making therapeutic recommendations for medications that have not received regulatory approval for that purpose.
 - f) make every effort to avoid real or perceived bias, commercial or otherwise
 - g) presenters must disclose affiliations that may cause real or perceived bias, both verbally and in a slide, if a slide deck is used for the presentation. SPC's should reference the [CEPD Speaker disclosure slide template](#).
 - h) presentations must include references to evidence used in content
 - i) presenters must integrate time for interactivity in their presentation, whether Q&A or other mechanism. SPC's should reference the CEPD [tips for in-person interactivity](#) and the [virtual tips for interactivity](#) resources.
 - j) Presenters must provide their presentation and educational material to the SPC for review prior to the activity.
 - k) Ensure that presenters are aware of the professional and legal standards related to, privacy, confidentiality, and copyright.
- 4.2.d The SPC must have a process to collect from participants their assessment of the degree to which the accredited CPD activity:
- met the stated learning objectives,
 - achieved appropriate balance,

- was perceived to be biased.

4.2.e The SPC must have a process in place to deal with issues of non-compliance with the Ethics Policy.

4.3 Element 3: Conflict of Interest

A conflict of interest (COI) occurs when external interests interfere or appear to interfere with the primary interest (in this case, a CPD activity). It is a requirement that all individuals involved in developing accredited/certified CPD activities be transparent about their financial relationships. This element describes the processes for gathering and reviewing financial disclosures, identifying and eliminating COIs and conveying this information to learners.

4.3.a All members of the SPC, speakers, moderators, facilitators, and authors must complete the [COI Declaration form](#) to provide the SPC with a written description of all relationships that could be seen by a reasonable, well-informed participant as having the potential to influence the content of the educational activity with for-profit and not-for-profit organizations over the previous 2 years. Individuals must disclose regardless of their view of the relevance of the relationship to the activity. Disclosures include (but not necessarily limited to):

- a) Any direct financial payments including receipt of honoraria;
- b) Membership on advisory boards or speakers' bureaus;
- c) Funded grants or clinical trials;
- d) Patents on a drug, product, or device; and
- e) All stipends or salaries received from an educational institution

4.3.b The SPC is responsible to review all disclosed financial relationships of speakers, moderators, facilitators, and authors in advance of the CPD activity to determine whether action is required to manage potential or real conflicts of interest.

Affiliations are relevant if the individual or entity stands to gain financially through the development and delivery of the CPD activity.

4.3.c **The SPC must have procedures in place to mitigate the potential or real bias related to relevant affiliations.** The SPC must take steps relevant to the role of the person with the affiliation of concern. Appropriate mitigation steps may include:

- Individual excuses themselves from Involvement In any discussions related to their disclosed financial relationship
- Individual is asked to participate in an unrelated aspect of planning or presenting
- Individual alters their financial relationship
- Individual steps away from content planning related to their affiliation
- Relevant content Is reviewed through independent content validation process by a member of the SPC
- Individual may need to step away completely

**Mitigation steps must be documented by the planning committee.

4.3.c All members of the SPC, speakers, moderators, facilitators, and authors, must disclose to participants their relationships as described In the COI declaration form.

Disclosure to learners must identify the organization by their name only.

Disclosure to learners must not include the organization's corporate or product logos, trade names or product group messages. Where an individual has no relevant financial relationship, this should be noted. Learners must receive disclosure information in a format that can be verified at the time of accreditation, before engaging with the CPD activity.

4.3.d Any individual who fails to disclose their relationships as described cannot participate as a member of the SPC or content contributor of the CPD activity.

4.4 Element 4: Financial and In-Kind Support

When financial or in-kind support from healthcare / pharmaceutical industry (HPI) or other for-profit entity is sought, the SPC is responsible for ensuring the support does not result in

influence in the CPD activity. Financial and In-kind support, also known as sponsorship, cannot establish a financial relationship between the sponsoring HPI and the SPC or others in control of content of the CPD activity.

- 4.4.a The Physician organization or SPC is responsible to receive any financial and in-kind support for the development of an accredited CPD activity.
- 4.4.b The SPC cannot be required to accept advice from a sponsor as a condition of receiving financial and in-kind support. Specific interests of any sponsor must have no direct or indirect influence on any aspect of the development, delivery, or evaluation of an accredited CPD activity.
- 4.4.c The physician organization must seek support from multiple sources to avoid the perception of influence of a single sponsor. It is preferential to have multiple sponsoring organizations with competing products or services to provide balance.
- 4.4.d The terms, conditions, and purposes of financial or In-kind support must be documented in a written, countersigned agreement between the sponsoring organization and the physician organization. The sponsorship agreement outlines the opportunities that sponsors have for supporting a CPD activity. The opportunities for sponsors may include the following:
 - a) an opportunity to interact with participants in a location that is separate from the educational aspects of the CPD activity
 - b) display space in an exhibit area that is separate from the educational aspects of the CPD activity with choice of location depending on the support level
 - c) limited number of representatives attending the CPD activity, as auditors
 - d) acknowledgment of all sponsors together, listed in tiered sponsorship support levels in permitted sponsor recognition locations separate from the CPD activity

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- 4.4.e SPC's must ensure that peer selling and identifying information of any participants in a CPD activity to sponsors is not permitted. Sponsors should not have access to a registration list if in-person, and should not see the names of participants in the virtual environment without participants being made of sign-in options during registration.
- 4.4.f The physician organization must ensure honoraria and/or reimbursement is reasonable and made independently from sponsorship. Honoraria and reimbursement for travel, lodging and meal expenses to members of the SPC, speakers, moderators, facilitators, or authors should be similar to an equivalent activity that does not have sponsorship (i.e., sponsorship should assist in covering the cost of the activity, not augment the activity and associated payments).
- 4.4.g Participants cannot be offered or accept any payment, subsidy, or other compensation from any sponsor. Note that participants may claim registration, travel and accommodations compensation for example, from residency programs, employers, LEGs, or provincial CPD support funds, even when activities they attend have received support from these sources.
- 4.4.h Expenses of partners/spouses of the SPC, content contributors or participants cannot be paid for by a sponsor.
- 4.4.i The physician organization must keep a record of the amount or kind of support received and how it was used.
- 4.4.j Participants must be informed of the names of the sponsors providing support. This is to ensure transparency. When informing participants, sponsors' names must be shared in accordance with 4.4.j (see below).
- 4.4.k The SPC must ensure sponsors are recognized only in permitted locations, using the following standard acknowledgment statement:
"This program has received an educational grant or in-kind resources from [names of funding organizations]."

Beyond the standard acknowledgement statement, the linking or alignment of a sponsor's name (or other branding strategies) to a specific educational session or section of an educational activity within an accredited group learning activity is prohibited.

Permitted locations to recognize sponsors:

In-person:

- in the introductory/break slides
- in printed syllabus only when separated from educational content
- in a separated exhibit area

In electronic formats:

- in separate tab on app or website
- hyperlink to sponsor website, with statement clearly indicating participant is leaving CPD activity/physician organization website
- in a separated virtual exhibit area

Not Permitted:

- no company advertisements
- no marketing material describing what a company does in educational program (a separate exhibitor program is permitted)
- no trade names, product names or group messages to participants from the event
- no endorsements of the company or its products by the physician organization
- no acknowledgement in educational program, brochures/flyers, certificates, presenter slides, meals
- no company or product colours
- no use of sponsor sites for CPD activity

4.4.l Any commercial exhibits or booths must be clearly separated from the educational aspects of the CPD activity, whether in-person or online. The SPC must communicate the following requirements to the sponsor representatives and ensure that they have no participation in the CPD activity:

- the proportion of representatives must be minimal in terms of overall participants
- sponsor representatives must be clearly identified as sponsors, so there is a visible difference between them and the physicians/other health professional participants
- representatives may go into the learning space but only as auditors (i.e. non-participating)
- representatives cannot market products at any point during the CPD activity (exhibit area excepted)
- representatives cannot complete evaluation forms or be considered in needs assessments

NOTE: In cases where there is no exhibit area, these elements must still be in place

4.4.m The only permitted incentive for participants to visit sponsor exhibits is the “exhibitor passport” in which participants receive a stamp for visiting an exhibit booth. The completed passport may be entered into a draw for a prize, which must be paid for by the physician organization. Any other forms of participant incentives are not permitted.

4.4.n The physician organization or SPC has an obligation to ensure their interactions with sponsors meet professional standards and legal requirements including the protection of privacy and confidentiality.

4.5 Element 5: Unaccredited Activities

This section defines the roles and responsibilities of the SPC in relation to unaccredited CPD Activities.

4.5.a The SPC/physician organization cannot schedule unaccredited CPD activities to

take place at times and locations that interfere or compete with accredited CPD activities.

- 4.5.b Unaccredited CPD activities cannot be listed or included within activity agendas, programs or calendars of events (preliminary and final).

5.0 ROLES AND RESPONSIBILITIES

CEPD Office: It is the responsibility of the CEPD Office to ensure that SPC's have the necessary resources and guiding documents to ensure that program development adheres to the National Standard for the Support of Accredited CPD Activities, the CMA Guidelines for Physicians in Interaction with Industry and the CACME Standards.

Scientific Planning Committee/Physician Organization: The SPC or physician organization must ensure adherence to the National Standard for the Support of Accredited CPD Activities as presented in this document to avoid the perceived or real influence of sponsoring organizations and individuals and to mitigate potential conflicts of interest in the delivery of the education activity.

Sponsor: to the sponsoring organization must abide by the National Standard for the Support of Accredited CPD Activities and the Innovative Medicines Canada Code of Ethical Practices.

6.0 INTERPRETATION

Associate Dean, CEPD

Director, CEPD

Medical Director, CEPD

Accreditation Coordinator, CEPD

cepd@nosm.ca

7.0 RELATED DOCUMENTS

Related policies; (ii) any applicable legal or regulatory information (from the Policy Statement section); or (iii) any FAQ documents, forms, or other information related to the policy.

University Documents and Information

- [CEPD Office Program Development Toolbox](#)
- [CEPD COI Policy](#)
- [NOSM University COI Policy](#)
- [CEPD Escalation Process](#)
- [CEPD Ethics Policy: Sponsorship and Exhibitors](#)
- [CEPD Regularly Scheduled Series \(RSS\) Policy](#)
- [Sponsor Agreement form](#)

Legislation and Information

- [National Standard for the Support of Accredited CPD Activities](#)
- [CMA Guidelines for Physicians in Interaction with Industry](#)
- [Innovative Medicines Canada Code of Ethical Practices](#)
- [CACME Standards](#)
- [CFPC Mainpro+ Certification Standards](#)
- [RCPSC Accreditation Standards](#)

AUTHORITIES AND OFFICERS

The following is a list of authorities and officers for this policy:

- a. Approving Authority: CEPD Governance Committee
- b. Responsible Officer:
- c. Procedural Authority:
- d. Procedural Officer:

Review and Revision History

Review Period: Annually or as required

Date for Next Review: 2025 05

Date	Action
May 10, 2024	Approved by CEPD Governance Committee
May 14, 2024	Brought to Data Standards Working group to review definitions
June 11, 2024	Finalized integration of feedback from Data Standards Group per comments from CEPD Governance Committee. Sent email explain what was and was not incorporated.