
Integrity and Independence of Continuing Professional Education Policy

The Doctors Company has been accredited to provide continuing education (CME/CE) activities by the:

- Accrediting Council for Continuing Medical Education (ACCME)
- American Nurses Credentialing Center (ANCC)
- American Dental Association (ADA)

We are committed to ensuring that all activities are planned and implemented in accordance with the standards and requirements of these accrediting bodies and to providing relevant educational activities for clinicians that promote improvements in the quality of health care independent of the control and bias of commercial interests.

To ensure independence in development and implementation of continuing education, The Doctors Company does not jointly provide or collaborate on educational activities with commercial interests; nor do we provide accreditation for activities funded (monetary or in-kind) by commercial interests.

All Activity Directors, planners and faculty involved in decisions about educational content must recognize and agree in writing to abide by the following policy provisions and procedures:

1. Requirements for Disclosure of Relevant Financial Relationships:

- Faculty, planners, and others in a position to control continuing professional education content are required to disclose in writing all financial relationships with ineligible companies within the past 24 months regardless of the amount and their view of the relevance of the relationship to the education. *Ineligible companies are organizations whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.*
- Any individual who refuses to disclose relevant financial relationships will be disqualified from participating in the development, planning, implementation, provision, or evaluation of accredited activities.

2. Resolution of Conflicts of Interest

- Each financial relationship that occurred within the past 24 months will be reviewed to determine if it is relevant based on the content or target audience, or the individual's role in the accredited activity. Any financial relationship determined to be relevant represents a Conflict of Interest (COI) that must be resolved prior to the activity. Methods to resolve COIs include:
 - a. Recusing the individual from serving as faculty, planner, or in any other role.
 - b. Limiting participation of any planner or faculty to those aspects of the activity that do not represent a COI.
 - c. Investigating if the financial relationship has been discontinued.
 - d. Facilitating independent peer-review to ensure there is no commercial bias.
 - e. Denying of request for accreditation for the activity or portion of the activity.

3. Informing Participants of Relevant Financial Relationships

- All relevant financial relationships must be disclosed in a written format (print, slide, Web page) to participants prior to the presentation of content of the activity, including name of the individual, name of the ineligible company and the relationship between the two. If no relationships exist, this must be disclosed in the same manner. The CPE Team will provide Joint Sponsors with a templated disclosure slide to insert as an introductory slide.

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- Activities will be evaluated by participants to determine if the content was free of bias and met acceptable scientific standards. All activity evaluation summaries that indicate that commercial bias was perceived by more than 5% of the participants will be reviewed by the CPE Team and the Activity Director. Appropriate action to address the instance of bias and prevent further bias will be taken.

4. Requirements to Ensure Content Free of Bias

The following are our requirements to ensure bias-free education.

- Educational materials, such as slides, abstracts, and handouts, cannot contain any advertising, corporate logo, trade name, or a product-group message of a commercial interest.
- Live in-person and live virtual activities: Advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after an accredited activity. Joint Sponsors cannot allow representatives of commercial interests to engage in sales or promotional activities while in the space or place of the accredited activity. Print advertisements and promotional materials cannot be interleaved within the pages of the educational content.
- Computer-based enduring (on-demand) activities: Advertisements and promotional materials are prohibited before, during, or after the educational activity.
- Joint Sponsor Website: Advertising of any type is prohibited within the educational content of activities including, but not limited to, banner ads, and pop-up window ads.
- Audio and Video Recordings: 'Commercial breaks,' advertisements, or promotional materials are prohibited before, during, or after educational activities.
- Journal-based and Print Activities: Advertising or product group messages within the pages of the content or within the pages of the related questions or evaluation materials is prohibited.
- Accredited activities may not appear on a website owned or controlled by a commercial interest. The Doctors Company or a joint providers website may not be linked to that of an ineligible commercial interest.
- Mention of faculty/presenters' place of employment during the activity, bios of faculty/presenters that describe their role/position in a company/organization, and discussion of faculty/presenters' research or data are allowed.

5. Requirements to Ensure Content Validity

Educational activities accredited by The Doctors Company are designed to advance the public interest and promote improvements or quality in healthcare and must adhere to these requirements.

- Content and related materials must promote improvements or quality in healthcare.
- Content must provide a balanced view of therapeutic options.
- Content must be based on the most recent, high quality scientific evidence and citations of the source must be provided.
- Content that is not established medical practice must be identified as such.
- Discussion of unlabeled or investigational uses of commercial products must be identified as such.
- Faculty (authors, presenters, speakers) should provide a balanced view of therapeutic options by utilizing generic names to ensure impartiality unless the therapeutic option is the only one of its kind.



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