

Commercial Support Policy

The KH CME Program may choose to accept commercial support (defined as financial or in-kind support from **ineligible companies**) and is responsible for ensuring that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. The support does not establish a financial relationship between the ineligible company and planners, faculty, and others in control of content of the education.

Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

1. Decision-making and disbursement: The KH CME Program must make all decisions regarding the receipt and disbursement of the commercial support.

a. Ineligible companies must not pay directly for any of the expenses related to the education of the learners.

b. The KH CME Program may use commercial support to fund honoraria or travel expenses of planners, faculty, and others in control of content for those roles only.

c. The KH CME Program must not use commercial support to pay for travel, lodging, honoraria, or personal expenses for individual learners or groups of learners in accredited education.

d. The KH CME Program may use commercial support to defray or eliminate the cost of the education for *all* learners.

2. Agreement: The terms, conditions, and purposes of the commercial support must be documented in an agreement between the ineligible company and the KH CME Program. The agreement must be executed prior to the start of the accredited education. The KH CME Program can sign onto an existing agreement between it and a commercial supporter by indicating its acceptance of the terms, conditions, and amount of commercial support it will receive.

3. Accountability: Planners of the KH CME event must keep a record of the amount or kind of commercial support received and how it was used, and must produce that accounting, upon request, by the accrediting body or by the ineligible company that provided the commercial support.

4. Disclosure to learners: Planners of the KH CME event must disclose to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education. Disclosure must not include the ineligible companies' corporate or product logos, trade names, or product group messages.

Managing Ancillary Activities Offered in Conjunction with Accredited Continuing Education

The KH CME Program is responsible for ensuring that education is separate from marketing by ineligible companies—including advertising, sales, exhibits, and promotion—and from non-accredited education offered in conjunction with accredited continuing education.

1. Arrangements to allow ineligible companies to market or exhibit in association with accredited education must not:

- a. Influence any decisions related to the planning, delivery, and evaluation of the education.
- b. Interfere with the presentation of the education.
- c. Be a condition of the provision of financial or in-kind support from ineligible companies for the education.

2. Planners of the KH CME event must ensure that learners can easily distinguish between accredited education and other activities.

a. Live continuing education activities: Marketing, exhibits, and non-accredited education developed by or with influence from an ineligible company or with planners or faculty with unmitigated financial relationships **must not occur in the educational space within 30 minutes before or after** an accredited education activity. Activities that are part of the event but are not accredited for continuing education must be clearly labeled and communicated as such.

b. Print, online, or digital continuing education activities: Learners must not be presented with marketing while engaged in the accredited education activity. Learners must be able to engage with the accredited education without having to click through, watch, listen to, or be presented with product promotion or product-specific advertisement.

c. Educational materials that are part of accredited education (such as slides, abstracts, handouts, evaluation mechanisms, or disclosure information) must not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.

d. Information distributed about accredited education that does not include educational content, such as schedules and logistical information, may include marketing by or for an ineligible company.

3. Ineligible companies may not provide access to, or distribute, accredited education to learners.