

## Standard 5: Standards for Integrity and Independence

Criterion and Evidence	Meets Criterion	Needs Improvement
<b>Ensure Content is Valid</b>		
<b>Content Validity [5.1]</b>  (Attach process for ensuring information presented is fair, balanced, and evidence-based. Include supporting evidence.)	The provider ensures that CE is fair and balanced and clinical content presented supports safe, effective patient care. <ul style="list-style-type: none"> <li>All recommendations are based on current science, evidence, and clinical reasoning, while giving fair and balanced view of diagnostic/therapeutic options.</li> <li>All scientific research in CE conforms to the generally accepted standards of experimental design, data collection, analysis, and interpretation.</li> <li>The provider facilitates engagement with new/evolving topics without advocating for, or promoting, practices that are not, or not yet, adequately based on current science, evidence, and clinical reasoning.</li> </ul> <p style="text-align: right;">Meets <input type="checkbox"/></p>	The provider does not ensure that CE is fair, balanced and based on current science, evidence and clinical reasoning. Or scientific research in CE does not conform to the generally accepted standards of experimental design, data collection, analysis, and interpretation. Or CE content advocates or promotes practices that are not, or not yet, adequately based on current science, evidence, and clinical reasoning. <p style="text-align: right;">Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<b>Prevent Commercial Bias and Marketing in Accredited Continuing Education</b>		
<b>Preventing Commercial Bias and Marketing [5.2]</b>  (Attach process for ensuring CE protects learners from commercial bias and marketing. Include supporting evidence.)	The provider ensures that CE protects learners from commercial bias and marketing. <ul style="list-style-type: none"> <li>All decisions related to planning, faculty selection, delivery, and evaluation are made without influence or involvement from the owners and employees of an ineligible company.</li> <li>CE activities are free of marketing or sales of products or services. Faculty do not promote or sell products or services that serve their professional or financial interests.</li> <li>Names or contact information of learners is not shared with any ineligible company or its agents without the explicit consent of the individual learner.</li> </ul> <p style="text-align: right;">Meets <input type="checkbox"/></p>	The provider does not ensure all decisions related to planning, faculty selection, delivery, and evaluation are made without influence or involvement from owners and employees of an ineligible company. Or the provider does not ensure CE activities are free of marketing or sales of products/services, including faculty promotion or sales of products/services that serve their professional or financial interests. Or the names or contact information of learners is shared with an ineligible company or its agents without the explicit consent of the individual learner. <p style="text-align: right;">Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<b>Identify, Mitigate, and Disclose Relevant Financial Relationships</b>		
<b>Identify relevant financial relationships [5.3 (1-3)]</b>  (Attach evidence of identification of relevant financial relationships.)	The provider: <ul style="list-style-type: none"> <li>Collects information from all planners, faculty, and others in control of content about all financial relationships with ineligible companies within the prior 24 months, i.e. name of company and nature of relationship.</li> <li>Excludes owners or employees of ineligible companies. (Three exceptions to exclusion are outlined in the standard.)</li> <li>Identifies relevant financial relationships.</li> </ul> <p style="text-align: right;">Meets <input type="checkbox"/></p>	The provider does not collect information from all individuals in control of content about all financial relationships with ineligible companies within the prior 24 months or does not exclude owners/employees of ineligible companies or does not identify relevant financial relationships. <p style="text-align: right;">Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<b>Mitigate relevant financial relationships [5.3 (4)]</b>  (Attach evidence of mitigation of relevant financial relationships.)	Prior to the individuals assuming their roles, the provider take steps to prevent all those with relevant financial relationships from inserting commercial bias into content. Steps taken are documented by the provider.	The provider does not take steps to prevent all those with relevant financial relationships from inserting commercial bias into content. Or mitigation does not occur prior to individuals assuming their roles. Or the provider does not document the mitigation steps taken.

	Meets <input type="checkbox"/>	Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/>
<p>Disclose all relevant financial relationships to learners [5.3 (5)]</p> <p>(Attach evidence of disclosure to learners.)</p>	<p>The provider discloses the following to learners prior to engaging in the activity:</p> <ol style="list-style-type: none"> <li>Names of the individuals with relevant financial relationships.</li> <li>Names of the ineligible companies with which they have relationships.</li> <li>Nature of the relationships.</li> <li>A statement that all relevant financial relationships have been mitigated.</li> <li>If applicable, a statement of disclosure of absence of relevant financial relationship(s) (either individually or as a group).</li> </ol> <p>Ineligible companies' corporate or product logos, trade names, or product group messages are not included in disclosure to learners.</p> <p>Meets <input type="checkbox"/></p>	<p>The provider does not disclose relevant financial relationships on the part of all individuals in a position to control content. Or learners do not receive disclosure information before engaging with the activity. Or disclosure includes corporate or product logos, trade names, or product group messages of ineligible companies.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<b>Manage Commercial Support Appropriately</b>		
<input type="checkbox"/> We <b>Do Not</b> accept commercial support for any directly or jointly provided CPE activities. (If checked, this section is not applicable.)		
<p>Decision-making and disbursement [5.4 (1)]</p> <p>(Attach evidence of decision-making and disbursement of commercial support, e.g. grant agreements, income/expense statements.)</p>	<p>The provider makes all decisions regarding receipt and disbursement of commercial support.</p> <ol style="list-style-type: none"> <li>Ineligible companies do not pay directly for any of the expenses related to the education or the learners.</li> <li>If commercial support is used to fund honoraria or travel expenses, it is only for planners, faculty, or others in control of content for those roles.</li> <li>Commercial support is not used to pay for travel, lodging, honoraria, or personal expenses for individual learners or groups of learners.</li> <li>If commercial support is used to defray or eliminate the cost of the education, it is for all learners.</li> </ol> <p>Meets <input type="checkbox"/></p>	<p>The provider allows ineligible companies to influence decisions regarding the disposition and disbursement of commercial support. Or direct payment is given by ineligible companies to learners or those involved in the activity (e.g., planners, teachers, authors).</p> <p>The provider pays honoraria or expenses to learners. Or the provider uses commercial support to defray or eliminate the cost of the education for individual learners or groups of learners.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<p>Agreements [5.4 (2)]</p> <p>(Attach grant agreements for requested commercially supported activities.)</p>	<p>The provider uses agreements executed by the ineligible company and provider prior to the activity that specify the terms, conditions, and purposes of the commercial support.</p> <p>Meets <input type="checkbox"/></p>	<p>The provider does not use written agreements when commercial support is obtained or the agreements do not document that the provider retains responsibility. Or the agreements are missing, unexecuted or completed after the activity.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<p>Accountability [5.4 (3)]</p> <p>(Attach evidence of receipt and expenditure of commercial support, e.g., income/expense statements.)</p>	<p>The provider keeps a record of the amount or kind of commercial support received and how it was used.</p> <p>Meets <input type="checkbox"/></p>	<p>The provider does not keep a record of the amount or kind of commercial support or cannot produce accounting records.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>

<p>Disclosure to learners [5.4 (4)]</p> <p>(Attach evidence of disclosure to learners.)</p>	<p>The provider discloses to the learners the name(s) of the ineligible company(ies) that gave the commercial support, or the nature of the support if it was in-kind, prior to the learners engaging in the activity. Disclosure does not include the ineligible companies' corporate or product logos, trade names, or product group messages.</p> <p>Meets <input type="checkbox"/></p>	<p>The provider does not disclose to learners the name(s) of the ineligible company(ies) that gave the commercial support, or the nature of the support if it was in-kind. Or disclosure does not occur prior to learners engaging in the activity. Or disclosure includes corporate or product logos, trade names, or product group messages of ineligible companies.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<b>Manage Ancillary Activities Offered in Conjunction with Accredited Continuing Education</b>		
<p>Arrangements [5.5 (1)]</p> <p>(Reference evidence of arrangements made to separate marketing from continuing education, e.g., agreements.)</p>	<p>The provider ensures arrangements to allow ineligible companies to market or exhibit in association with accredited education are not:</p> <ol style="list-style-type: none"> <li>Influencing any decisions related to the planning, delivery, and evaluation of the education.</li> <li>Interfering with the presentation of the education.</li> <li>A condition of the provision of financial or in-kind support from ineligible companies for the education.</li> </ol> <p>Meets <input type="checkbox"/> or N/A (Exhibits/Marketing not associated with CE) <input type="checkbox"/></p>	<p>Arrangements for marketing or exhibits by ineligible companies influence decisions related to the planning, delivery, and evaluation of the accredited education, or interfere with the presentation of the education, or are a condition of the provision of financial or in-kind support from ineligible companies for the education.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<p>Management [5.5 (2)]</p> <p>(Reference evidence of separation of marketing from continuing education, e.g., activity announcements, educational materials.)</p>	<p>The provider ensures that marketing by ineligible companies is kept separate from the educational activity.</p> <ul style="list-style-type: none"> <li>Live: Marketing, exhibits, and non-accredited education developed by or with influence from an ineligible company or with planners or faculty with unmitigated financial relationships do not occur in the educational space within 30 minutes before or after an accredited activity.</li> <li>Print, online, or digital: Learners are not presented with marketing while engaged in the activity or made to click through, watch, listen to, or be presented with product promotion or product-specific advertisement in order to engage with CE content.</li> </ul> <p>Educational materials do not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.</p> <p>Meets <input type="checkbox"/></p>	<p>The provider does not ensure that marketing by ineligible companies is kept separate from the educational activity.</p> <ul style="list-style-type: none"> <li>Live: Marketing and non-accredited education occur in the educational space within 30 minutes before or after an accredited activity.</li> <li>Print, online, or digital: Learners are presented with marketing while engaged in the activity. Or learners must click through, watch, listen to, or be presented with product promotion or product-specific advertisement in order to engage with educational content.</li> </ul> <p>Or educational materials contain marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>
<p>Management [5.5 (3)]</p>	<p>The provider does not allow ineligible companies to provide access to, or distribute, CE to learners.</p> <p>Meets <input type="checkbox"/></p>	<p>The provider allows ineligible companies to provide access to, or distribute CE to learners.</p> <p>Needs Improvement <input type="checkbox"/> or Additional Docs Required <input type="checkbox"/></p>

**If the rating is Needs Improvements, briefly explain the rationale (use additional sheets if needed):**