****

**ACPE Standards for Continuing Pharmacy Education (CPE)**

**Standard 5: Standards for Integrity and Independence**

**Frequently Asked Questions**

|  |
| --- |
| **5.5: Manage Ancillary Activities Offered in Conjunction with Accredited Continuing Education** |

**Is it acceptable to have an agreement with an ineligible company stating, "In exchange for $5,000 of commercial support, we will produce the CPE activity and as a commercial supporter you will get an acknowledgment and a 4x4 sq ft booth in the exhibit hall. In exchange for $25,000 of commercial support, we will produce the CPE activity and you will get an acknowledgment and a 20x20 sq ft booth in the exhibit hall along with the opportunity for your sales staff to promote your products at an evening reception"?**
No, in this scenario the ineligible company is giving commercial support and getting promotional and sales opportunities. Opportunities for advertising and promotion are being purchased with commercial support and have become a condition of the support. Both are not in compliance with this Standard.

The ineligible company should buy advertising and promotion opportunities with resources designated for that purpose. If an agreement for advertising or promotion is struck between the two parties it must be outside the written agreement for commercial support. Any event or product that contains advertising or promotional opportunities must not be part of the educational CPE activity and must not be paid for by commercial support.

**Is the 30-minute time interval required regardless of whether the nonaccredited activity takes place before, during, or after the accredited activity?**

Yes. There needs to be a 30-minute interval between an accredited and nonaccredited session or activity regardless of whether the nonaccredited activity is before, after, or both. As noted in Guideline 5, this time interval is required if the nonaccredited activity is either developed by or with an ineligible company, or if individuals with unmitigated, relevant financial relationships with ineligible companies are in control of content.

**Does there need to be a 30-minute interval between accredited education and sessions that fit the exceptions listed in Guideline 5, i.e., when there is no need to identify, mitigate or disclose relevant financial relationships?**

No. Nonaccredited education (or sessions) as described in the question, would not need to be separated from accredited education by 30-minute intervals because those sessions are not “controlled by ineligible companies or include individuals with unmitigated, relevant financial relationships.” An example might be a legislative briefing or an awards ceremony.

**Does there need to be a 30-minute interval between accredited and nonaccredited education in virtual activities?**

The 30-minute interval is required for all live activities, whether the activity takes place in-person or online. For live, online activities, if the learner will remain in the same "virtual space" for a nonaccredited session, then the provider must ensure that there is a 30-minute interval before or after accredited education.

If the learner is required to leave the virtual space to transition between accredited and nonaccredited activities, and will need to take an action, such as clicking a link that clearly communicates that they are leaving the accredited education, then there is no time-interval requirement.

**Can we include advertising in a printed or digital handout that contains abstracts if we don't provide CE credit for the abstracts?**

It would depend on what the handout, with abstracts, is used for in relation to the CE activity. If the abstracts are referenced during the activity or serve as a component of the content, then there can be no advertising in the handout. If the abstracts are not referenced as part of the CE content, and appear in the handout with other logistical information about the activity, then advertising is allowed.

**Where can advertising for ineligible companies appear related to educational events?**

ACPE requires the separation of education from all promotional activities, materials and messages. Many providers create a print or text-based document that goes along with an activity and provides information that is supplementary to the education content - like reproductions of slides, graphics or other handouts. These documents, in print or electronic, are an integral part of the education and as such cannot have any advertising, corporate logo, trade name or a product-group message of an ineligible company associated with them.

**Can a CPE provider distribute its CPE activity via a television channel, website, or other type of communications vehicle that is owned by an ineligible company?**
No. Communication or distribution mechanisms that are owned or controlled by an ineligible company cannot be used to transmit or distribute CE activities to learners (e.g., website owned and controlled by an ineligible company.

**Does the prohibition of the use of corporate logos apply to exhibitors? I understand commercial exhibits are not commercial support.**

The corporate logos of ACPE-defined ineligible companies are prohibited when making disclosure of commercial support to learners or in educational materials. How a provider chooses to list or acknowledge commercial exhibitors is not prescribed by ACPE. If you include your list of exhibitors in your educational materials, you cannot include their corporate logos.