



## National Standard for Support of Accredited CPD Activities FAQs for Implementation

### On implementation

**1. When will the National Standard come into effect?**

**Answer:**

January 1, 2018.

**2. If a CPD activity is accredited<sup>1</sup> before December 31, 2017, but launched after January 1, 2018, is the activity required to comply with the National Standard?**

**Answer:**

No. It is recognized that this may not be possible in all instances, but CPD providers<sup>2</sup> are encouraged to make every effort to comply with the National Standard prior to delivery of the CPD activity.

**3. Is it acceptable for CPD provider organizations or scientific planning committees (SPCs) to amend their policies and procedures to comply with the National Standard before January 1, 2018?**

**Answer:**

Yes, we encourage CPD providers and SPCs to amend their policies and procedures prior to this date.

**4. Does the National Standard apply to accredited regular scheduled series, rounds, journal clubs, and small groups?**

**Answer:**

Yes.

**5. If a CPD provider hosts an accredited CPD activity in the province of Quebec after January 1, 2018, are both the conseil québécois de développement professionnel continu des médecins' ([CQDPCM](#)) Code of Ethics and National Standard applicable?**

**Answer:**

For Royal College MOC Section 1 or MOC Section 3 accredited activities the CQDPCM's Code of Ethics is only applicable to CPD activities developed by organizations directly accredited by the CMQ. After January 1, 2018, all MOC Section 1 or MOC Section 3 accredited activities must comply with the National Standard.

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1 Any use of the term "accreditation" applies to the CFPC Mainpro+ certification process.

2 For Royal College MOC Section 1 or MOC Section 3 credits, CPD provider organizations must always meet the definition of a physician organization. CFPC Mainpro+ two and three-credit-per-hour activities must be developed in collaboration with a physician organization.

For CFPC Mainpro+ certified activities the requirements of the [Code of Ethics](#) of the Conseil québécois de développement professionnel continu des médecins (CQDPCM <http://cqdpcm.ca/>) must be met for accredited activities held in the province of Québec. After January 1, 2018, all Mainpro+ certified activities must also comply with the National Standard. Wherever discrepancies exist between the National Standard and the Code of Ethics, the higher of the two standards shall prevail.

**6. Does the implementation of the National Standard eliminate or replace the *Canadian Medical Association Guidelines for Physicians in Interactions with Industry*?**

**Answer:**

No. Physicians participating in CPD activities should still adhere to the CMA's [Guidelines for Physicians in Interactions with Industry](#).

**7. For a CPD activity to award *both* MOC and Mainpro+ credits, must it be accredited by *both* the Royal College and the College of Family Physicians of Canada?**

**Answer:**

Yes. To award *both* Royal College MOC and CFPC Mainpro+ credits, CPD providers must pursue CPD accreditation by *both* systems.

**8. What updated resources, forms, and templates will the Colleges provide to help CPD providers comply with the National Standard?**

**Answer:**

Both Colleges will update application forms, reviewer tools, conflict-of-interest forms, and evaluation templates in advance of the launch of the National Standard. We anticipate these updated documents will be available by September 2017.

**On CPD providers and physician organizations**

**9. According to the glossary, a CPD provider organization “ordinarily” meets the definition of a “physician organization”. Are there circumstances when a CPD provider organization might *not* meet this definition?**

**Answer:**

For Royal College MOC Section 1 or MOC Section 3 credits, CPD provider organizations must always meet the definition of a physician organization.

For CFPC Mainpro+, a CPD provider organization cannot be a commercial interest or a representative of a commercial interest. This includes, but is not limited to, pharmaceutical companies, medical device companies, and other for-profit organizations, or communications or marketing companies in the employ of for-profit or commercial interests.

**10. Do the Colleges have a list of recognized physician organizations?**

**Answer:**

No, but any organization that meets the following definition is considered to be a physician organization:

A not-for-profit group of health professionals with a formal governance structure, accountable to and serving, among others, its physician members through:

- Continuing professional development
- Provision of health care and/or
- Research.

## On independence

### **11. Can CPD provider organizations fund their own CPD activity and also be represented on the scientific planning committee?**

**Answer:**

Yes, they can. Self-funding by eligible CPD provider organizations or SPCs is not considered sponsorship as defined by the Standard. A sponsor is considered to be an individual, group, corporation or organization *external* to the CPD provider developing the CPD activity.

### **12. Sub-element 1.3 reads “Representatives of a sponsor or any organization hired by a sponsor cannot participate in decisions related to CPD program elements:**

- a) *Identification of the educational needs of the intended target audience;*
- b) *Development of learning objectives;*
- c) *Selection of educational methods;*
- d) *Selection of speakers, moderators, facilitators and authors;*
- e) *Development and delivery of content; and*
- f) *Evaluation of outcomes.”*

#### **a. Can a representative of a sponsor (either a commercial or non-commercial interest) or any organization hired by a sponsor *attend* SPC meetings but not participate in decisions related to CPD program elements a) through f)?**

**Answer:**

For CPD activities accredited for Royal College MOC Section 1 or 3 credits, representatives of a sponsor or any organization hired by a sponsor may *attend* SPC meetings but are not permitted to participate in decisions related to CPD program elements a) through f) in sub-element 1.2.

For CPD activities accredited for CFPC Mainpro+ credits, representatives of a *commercial interest*, as defined by the National Standard, or any organization hired by a commercial interest cannot attend SPC meetings. Sponsors who are not commercial interests may *attend* SPC meetings but are not permitted to participate in decisions related to CPD program elements a) through f) in sub-element 1.2.

#### **b. What is meant by “hired”?**

**Answer:**

“Hired” refers to any organization (such as a medical communication company), working for, in conjunction with or accountable to a sponsor.

#### **c. Can a sponsor provide needs assessment details/materials?**

**Answer:**

Yes. The SPC may consider data or advice from all sources at its meetings, however, the SPC must ensure that it has exclusive control over the identification of needs for the intended target audience and all other decision-making related to the needs assessment process.

## On conflict of interest

### **13. What is an example of a non-financial relationship that must be disclosed by members of the SPC, speakers, moderators, facilitators, and authors as described in sub-element 3.1?**

**Answer:**

One example of a non-financial relationship is an individual serving as a volunteer for a not-for-profit patient advocacy organization without financial compensation. There may be others.

#### **On receiving financial and in-kind support**

##### **14. Can a sponsor provide in-kind support of a CPD activity in the form of the involvement of its representatives in the logistical planning of the activity?**

**Answer:**

Yes, they can. The National Standard defines in-kind support as “services or tools or human resources which have a monetary value and are provided to an organization in support of an educational activity.” Therefore, distributing invitations to potential participants, booking meeting space, liaising with vendors such as catering, audio visual services etc. could be considered “in-kind” support. Sub-element 4.3 requires “the terms, conditions and purposes by which sponsorship is provided must be documented in a written agreement signed by the CPD provider organization or SPC and the sponsor.” Such support must be recognized and disclosed to participants as part of a sponsorship acknowledgement page separate from the educational content (as per sub-element 5.1 of the National Standard). For Mainpro+ certified programs, such support must also be declared to program participants as part of the conflict of interest disclosures.

The CPD provider organization or SPC can *never* delegate to a commercial interest the payment of travel, lodging, legitimate out of pocket expenses and any honoraria offered to members of the SPC, speakers, moderators, facilitators and/or, authors.

##### **15. Can a sponsor directly pay expenses associated with a CPD activity, without first providing financial or in-kind support to the CPD provider organization?**

**Answer:**

No. A sponsor must provide sponsorship directly to the CPD provider organization or SPC in accordance with sub-element 4.1: “the CPD provider organization or SPC is responsible to receive any financial or in-kind support for the development of an accredited CPD activity.” This also applies to accredited rounds, journal clubs, and small groups (“regularly scheduled series”) as well as single-sponsored CPD activities. The CPD provider organization or SPC may choose to enter into a written agreement with a third party for the receipt of any financial or in-kind support from a sponsor.

The CPD provider or SPC may choose to delegate to the third party the payment of logistical costs such as audiovisual arrangements, venue rental fees, catering, etc. The CPD provider organization or SPC can *never* delegate to a commercial interest the payment of travel, lodging, legitimate out of pocket expenses and any honoraria offered to members of the SPC, speakers, moderators, facilitators and/or, authors.

If the CPD provider chooses to delegate to a third party the payment of travel, lodging, legitimate out of pocket expenses and any honoraria offered to members of the SPC, speakers, moderators, facilitators and/or authors, the CPD provider organization or SPC (or a third party with whom a written agreement has been established) is responsible to receive any sponsorship before delegating these payments. The CPD provider organization or SPC is responsible to maintain oversight of the budget expenditure(s).

##### **16. Is the CPD provider organization or SPC *required* to delegate payments to a third party in order to comply with the National Standard?**

**Answer:**

No. The CPD provider organization or SPC can *choose* to assume or delegate these payments to a third party<sup>3</sup>. The CPD provider organization or the SPC must approve what payments are delegated and retain overall accountability for these payments.

**17. What terms and conditions must be documented in a written agreement signed by the CPD provider organization or SPC and the sponsor of an accredited CPD activity?**

**Answer:**

As per sub-element 4.3, the terms, conditions and purposes by which sponsorship is provided must be documented in a written agreement signed by the CPD provider organization or SPC and the sponsor. The agreement could include (but not limited to) the following details:

- whether sponsorship is financial or in-kind support;
- the dollar amount of financial support provided;
- the specific in-kind resources provided;
- the sponsor's agreement to comply with the National Standard;
- that the SPC cannot be required to accept advice from a sponsor as a condition of receiving financial and in-kind support;
- that 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;
- how sponsorship will be recognized;
- how sponsorship will be disclosed to participants.

**a. Can a CPD provider organization or SPC hire a third party to draft and initiate these agreements?**

**Answer:**

Yes, a CPD provider organization or SPC can hire a third party to draft and initiate a written agreement.

**18. Are there guidelines on the maximum dollar amount for honoraria that can be paid to speakers?**

**Answer:**

No, the National Standard has not defined the maximum amount, however, *the CMA Guidelines for Physicians in Interactions with Industry* requires that any honoraria paid to faculty be reasonable<sup>4</sup>.

**19. Are there guidelines on the maximum dollar amount for meals provided at accredited CPD activities?**

**Answer:**

The Royal College has not set guidelines for the maximum dollar amount for meals provided at accredited CPD activities.

The CFPC Chapters have established limits on the costs of meals associated with Mainpro+ certified activities. The maximum values for breakfast, lunch, and dinner in each province are published in the *Understanding Mainpro+® Certification* guide.

The *CMA Guidelines for Physicians in Interactions with Industry* requires any meals provided to physicians during industry-sponsored CPD activities be modest<sup>5</sup>.

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<sup>3</sup> The CPD provider organization or SPC can never delegate to a commercial interest the payment of travel, lodging, legitimate out of pocket expenses and any honoraria offered to members of the SPC, speakers, moderators, facilitators and/or, authors.

<sup>4</sup> *CMA Guidelines for Physicians in Interactions with Industry*, 2007. Guideline 33.

<sup>5</sup> *CMA Guidelines for Physicians in Interactions with Industry*, 2007. Guideline 32.

## **On managing commercial promotion**

### **20. Regarding sub-element 6.5, what is considered to be an “incentive”?**

*6.5 Any incentive provided to participants associated with an accredited CPD activity must be approved by the CPD provider organization.*

**Answer:**

Sub-element 6.5 specifically relates to exhibits at an accredited CPD activity. An example of an “incentive” is an “exhibitor passport” provided to participants to record a “stamp” or signature for each exhibit booth that they visit. The completed passport is then entered into a draw for a prize. In this example, the incentive is the ability to win a prize if participants visit exhibit booths. Sub-element 6.5 requires incentive provided to participants associated with an accredited CPD activity be approved by the CPD provider organization.

### **21. What is an example of a sponsor’s “branding strategy” as referenced in sub-element 5.2 which reads:**

*Beyond the standard acknowledgement statement of financial and in-kind support outlined in 5.1, the linking or alignment of a sponsor’s name (or other branding strategies) to a specific educational session or section of an educational program within an accredited group learning activity is prohibited.*

**Answer:**

A sponsor’s branding strategy might include but is not limited to: logos, colours, graphics or any other visual that invokes a direct or indirect link to that sponsor or their product(s).

### **22. What is meant by the term “location” in sub-elements 6.2, 6.3, and 7.1?**

*6.2 Product-specific advertising, promotional materials or branding strategies cannot be included on/appear within locations where accredited CPD sessions are occurring (e.g. lecture halls, small group discussion rooms) immediately before, during or immediately after an accredited CPD activity.”*

*6.3 Commercial exhibits or advertisements must be arranged in a location that is clearly and completely separated from the accredited CPD activity.*

*7.1 “The SPC/CPD provider organization cannot schedule unaccredited CPD activities to take place at times and locations that interfere or compete with accredited CPD activities.”*

**Answer:**

The term “location” refers to a room or space that is clearly separated from the educational environment.