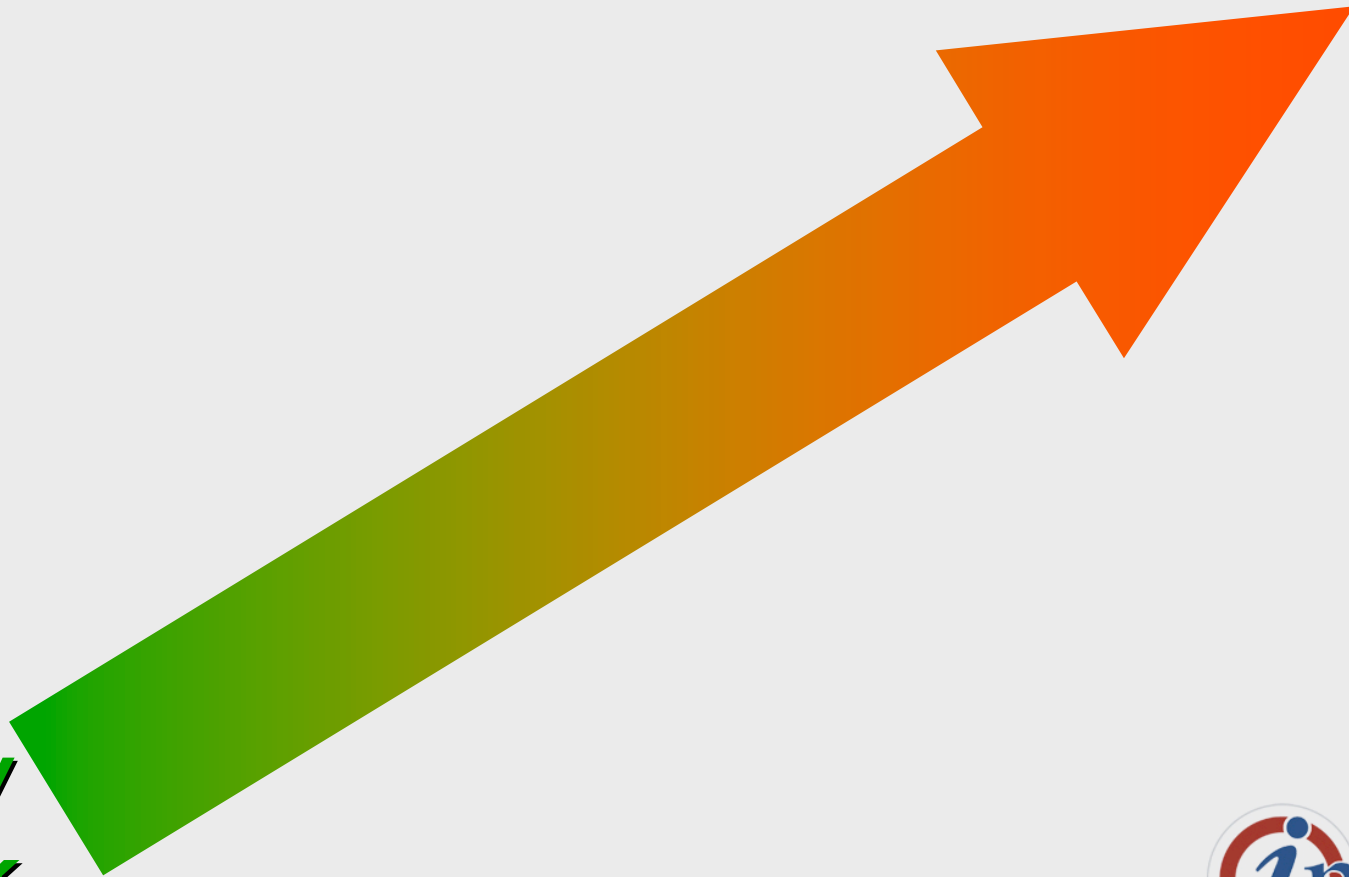


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**President, Indicia Medical Education**  
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- Solicited grants
- Recommendation of faculty
- Review of content
- Structure
- Marketing documents

***Low  
Risk***



***High  
Risk***

- RFPs are not inherently risky
- Expressing in broad terms what can be funded is acceptable
- Whether or not grant requests are solicited, what's going on “behind the scenes” is most important

- Recommending faculty is not inherently risky
  - Existing financial relationships increase risk
  - Recommendations should come from medical/clinical rather than marketing
  - Fair market value for honoraria helps manage risk

***Note: now prohibited by ACCME!***



- Clinical or scientific review could help ensure accuracy
  - But law enforcement is skeptical
  - Leaves a paper trail
- Not allowing supporter review could potentially have product liability implications
- Providers should have strict policies about when and how review is done

***Note: now prohibited by ACCME!***



- Supporters
  - Medical affairs
    - Should not report to marketing
  - Educational grants
    - Should not report to marketing
    - Marketing should not have a deciding vote on funding grants
- Providers
  - Those who control content should not be involved in content for marketing activities in the same therapeutic area
  - ACCME definition of “commercial interest”



- CME should not be included in marketing plans
- Providers must be careful in documenting their own plans



- Providers and supporters must assess risk in their own institution and balance it with innovation and quality
- Providers and supporters need ongoing training and professional development, active participation
  - Alliance for CME ([www.acme-assn.org](http://www.acme-assn.org))
  - Task Force conference ([www.ama-assn.org/go/cmeforces](http://www.ama-assn.org/go/cmeforces))
  - NAAMECC monograph ([www.naamecc.org](http://www.naamecc.org))
  - White paper from Seton Hall Law School (to be developed)

- Useful tools

- Risk stratification tool

- Barnes et al. *JCEHP*. 2007; 27: 234-240.

- Bias assessment tool

- Takhar et al. *JCEHP*. 2007; 27: 118-123.

- Criteria for selecting partners

- [www.naamecc.org](http://www.naamecc.org)

**Low  
Risk**

RFPs

Unsolicited  
grant requests

Marketing  
influence

Off-label  
discussion

Content  
control

**High  
Risk**

