

Proposed Revisions to CERP Eligibility Criteria

Call for Comments
October 2018

The Commission for Continuing Education Provider Recognition (CCEPR) is considering revising the Eligibility Criteria for the ADA Continuing Education Recognition Program (CERP). Under consideration is a proposal that commercial entities not be eligible for ADA CERP recognition. (Proposed revisions to the CERP Eligibility Criteria attached in Appendix 1).

The ADA CERP Glossary defines commercial interests/commercial entities as “Any entity producing, marketing, re-selling or distributing health care goods or services consumed by, or used on, patients. CCEPR does not consider providers of clinical services directly to patients to be commercial interests.”

Background: The Commission has reviewed literature on commercial conflicts of interest in health care education summarizing public, professional and regulatory concerns that financial ties between the health professions and industry, if not managed appropriately, may create conflicts of interest that may unduly influence professional judgment, compromise the objectivity of education, impact the quality of patient care, and undermine the public’s trust in the professions. Recognizing that relationships between healthcare professionals and commercial interests may also be beneficial, governmental, academic and professional agencies have developed recommendations for the appropriate management of commercial support for education in the health professions to help ensure independence from commercial influence. These include the U.S. Food and Drug Administration’s 1997 “Guidance for Industry,” the Department of Health and Human Services Office of the Inspector General’s 2009 statement to the U.S. Senate Special Committee on Aging, the Institute of Medicine of the National Academies April 2009 report on “Conflict of Interest in Medical Research, Education and Practice,” the American Dental Education Association’s “Guidelines for Ethical Education,” among others.

Since 2009, accreditors of continuing medical, physician assisting, nursing, pharmacy and optometry education in the U.S. have not considered commercial entities eligible for accreditation. The International Academy for Continuing Professional Development Accreditation, in its 2018 “Consensus Statement for Independence and Funding of Continuing Medical Education (CME)/Continuing Professional Development (CPD)” also takes the position that commercial interests should not be eligible for accreditation or to organize accredited activities.

Rationale: As oral healthcare becomes more integrated with healthcare in general, through interprofessional healthcare teams and education, it is increasingly important for dentistry to align with continuing education standards that have been adopted by other health professions.

ADA CERP Standard V.1 requires that “Educational objectives, content development, and selection of educational methods and instructors must be conducted independent of commercial interest.” Revising the CERP Eligibility Criteria to stipulate that commercial entities are not eligible for CERP recognition would further support and clarify existing CERP requirements regarding independence of CE from commercial influence, and would align with CE accreditation criteria in other healthcare professions.

The proposed revision to the Eligibility Criteria is limited to a commercial entity’s ability to apply for CERP recognition as a CE provider. Under this proposal, CERP recognized CE providers could accept support from a commercial entity as long as the commercial entity does not have a role in selecting or influencing CE content or instructors.

Process: At this time, the Commission is requesting feedback from the communities of interest on the proposal to revise CERP Eligibility Criteria to stipulate that commercial entities may not be recognized as

CE providers through ADA CERP. The Commission will review comments at its April 2019 meeting. If the Commission approves this change, it will develop an implementation time line and identify a date when the recognition status of any commercial entities will expire. The Commission will also develop a screening process to assist providers and the Commission to identify whether a provider meets the definition of "commercial entity."

Submitting comments: The Commission will accept comments from the communities of interest at an open hearing on the proposal on Friday, October 21, at 9:30 am, during the ADA annual meeting in Honolulu.

Written comments on the proposed revisions to the CERP Eligibility Criteria dated October 4, 2018 (Appendix 1) will be accepted until **January 31, 2019**.

Send written comments to Mary Borysewicz, Director, Commission for Continuing Education Provider Recognition, borysewicz@ada.org

DRAFT

Proposed Revisions to ADA CERP Eligibility Criteria

October 4, 2018

*Proposed additions underlined; proposed deletions in ~~strike~~through***ELIGIBILITY:** _____

The Commission for Continuing Education Provider Recognition (CCEPR) approves providers as defined in the ADA CERP Glossary and *Recognition Standards and Procedures*. CCEPR recognizes providers of continuing dental education (CECDE), not individual courses. Institutions, organizations or major units or departments within an institution/organization (e.g., an oral and maxillofacial surgery department of a medical center) in the United States and Canada are eligible to apply for recognition. Any provider of CECDE meeting the ADA CERP standards and criteria and the following requirements will be eligible to apply for recognition. CECDE providers submitting an application must meet the following eligibility criteria:

1. The CECDE provider offers a planned program of continuing dental education activities consistent with the definition of continuing dental education provided in the ADA CERP Glossary. The CECDE provider must demonstrate oversight by an independent advisory committee. The provider must have offered a planned program of CECDE activities for at least 12 months.
2. A CECDE provider must ensure that all courses offered have a sound scientific basis in order to adequately protect the public. CCEPR reserves the right to require that the applicant provide documentation that courses offered by the provider have a sound scientific basis, proven efficacy, and promote public safety.
3. The CECDE provider must demonstrate that it assumes the financial and administrative responsibility of planning, publicizing and offering the continuing education program consistent with the definition of provider in the CERP Glossary.
4. The CECDE provider must ensure that the educational methods are appropriate to the stated objectives for the activity and, when participation is involved, enrollment must be related to available resources to assure effective participation by enrollees.
5. The CECDE provider must ensure that the facilities selected for each activity are appropriate to accomplishing the educational method(s) being used and the stated educational objectives.
6. The CE Provider must not be a commercial entity or affiliated with a commercial entity. CCEPR defines a commercial entity/interest as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by or used on patients. Commercial entities are *not* eligible for recognition. A provider of clinical service directly to patients is not considered a commercial entity, unless it is owned by a commercial entity.

A continuing education provider affiliated with a commercial entity may be ineligible for ADA CERP recognition; for example, if the provider is employed by a commercial entity to provide a continuing education course, or provides a course as an agent of or advocate for a commercial entity or pursuant to a contract with a commercial entity.

- ~~6-7.~~ CECDE-providers that are not based in the United States or Canada must meet the additional eligibility criteria and requirements outlined in the Pre-application Process for International Providers *before* they will be considered eligible for recognition.

Although ADA CERP may not directly benefit some smaller groups, such as local CE study clubs, such groups are encouraged to explore possible affiliation agreements with their local or state dental societies.