

Understanding the Revised ADA CERP Eligibility Criteria

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COMMISSION FOR
CONTINUING EDUCATION
PROVIDER RECOGNITION

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Focus

CE independent of commercial influence

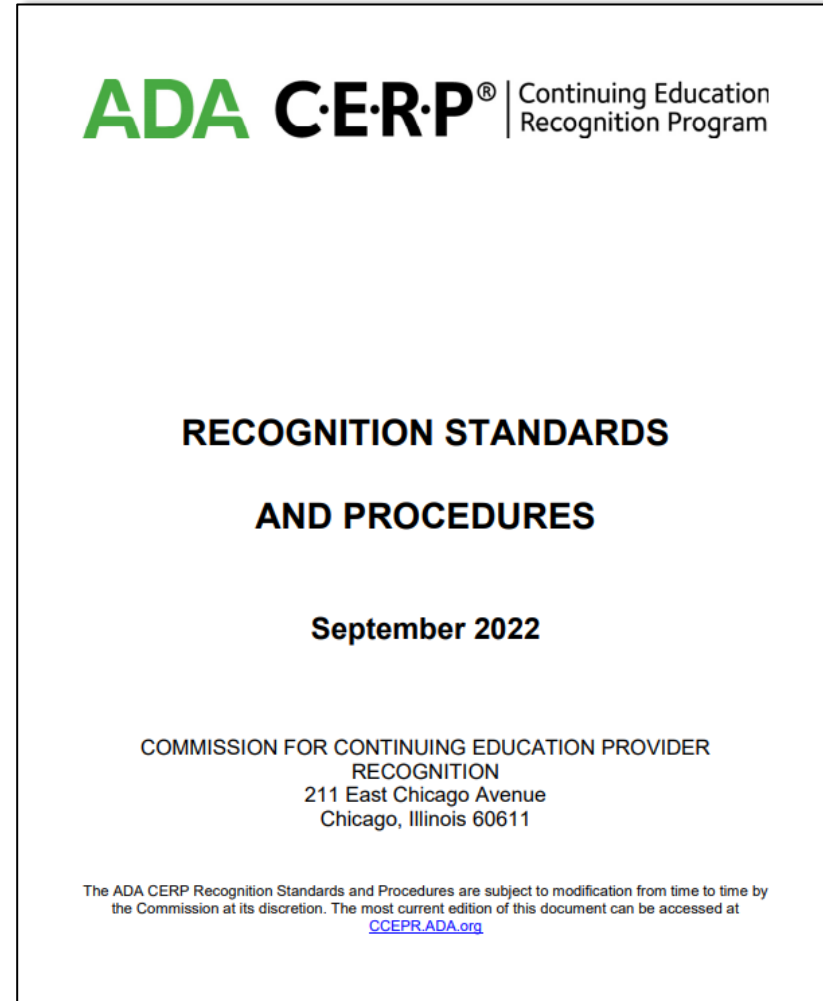
- Revised CERP Eligibility Criteria—Implications for providers
- CERP Standard V
 - Developing CE independent of commercial influence
 - Mitigating commercial conflicts of interest
 - Separation of marketing from CE

CCEPR mission statement

CCEPR serves the public, the dental profession, and other healthcare providers by developing and implementing standards that promote excellence in continuing dental education to support professional competence and continuous improvement of patient care.

What is effective CE?

- Meets professional needs
- Based on accepted science
- Independent from commercial influence
- Leads to improvements
 - Professional knowledge, performance or practice
 - Patient and public health



Independence from commercial influence

Standard V. Commercial conflicts of interest

- Educational objectives, content development, and selection of educational methods and instructors must be conducted independent of commercial interest. (V.1)
- The provider must take steps to protect against and/or disclose any conflict of interest advisory committee members, CE planners, and instructors may have (V.12).

CERP Eligibility Criteria

- Commercial interests will no longer be eligible for ADA CERP recognition effective July 1, 2023.

Commercial interest

- (1) An individual or entity that produces, markets, re-sells or distributes health care goods or services consumed by, or used on, patients, or
- (2) an individual or entity that is owned or controlled by an individual or entity that produces, markets, resells, or distributes health care goods or services consumed by, or used on, patients. Providing clinical services directly to or for patients (e.g., a dental practice, dental lab, or diagnostic lab) does not, by itself, make an individual or entity a commercial interest.

- *CERP Glossary*

Examples

Commercial interests

- Dental product manufacturer
- Dental products distributor
- Medical/dental device manufacturer
- Pharmaceutical company
- Education company owned or controlled by commercial interest

NOT commercial interests

- Education company (unless owned or controlled by commercial interest)
- Dental lab (unless it markets a proprietary product)
- Dental practice
- Insurance company
- Dental school (for profit or not for profit)

Conflict of Interest in Medical Research, Education and Practice (IOM Report, 2009)

- Collaborations between medicine and industry can benefit society
- Financial ties between medicine and industry may create conflicts of interest
 - Risk of undue influence on professional judgment
 - Objectivity of medical education and patient care compromised
 - Public's trust in the profession undermined
 - Growing concerns among public, lawmakers
- Need guidelines to reduce conflicts of interest and bias in education and practice

CERP Eligibility Criteria revision process

- Deliberative process conducted over several years
- Input from the communities of interest
- Reduce opportunity for commercial bias to impact continuing dental education
- Align with
 - CE standards of other healthcare professions
 - FDA 1997 guidance on separation of marketing and education activities

Implementation

- All new applicants must first complete Pre-Application to determine eligibility
- Eligibility survey sent in 2020 to all CERP recognized providers
- 43 providers identified as commercial interests; notified that recognition will expire June 30, 2023

Joint providership

- When two providers jointly plan CE activity
 - CERP provider responsible for meeting Standards
 - CERP provider issues CE credits
- Effective July 1, 2023, commercial interests may no longer serve as joint provider
 - No role in selecting topic, speaker, content

Joint provider

A continuing education provider that shares responsibility with an ADA CERP recognized provider for planning, implementing, evaluating, and keeping records for a continuing dental education activity. Responsibility for continuing education activities must rest with the ADA CERP recognized provider whenever the provider acts in cooperation with providers that are not recognized. [A commercial interest may not be a joint provider.](#)

- CERP Glossary

Role of commercial interest in CE*

	CERP Provider	Joint Provider†	Commercial Interest
Select CE topics	✓	✓	
Develop course objectives	✓	✓	
Select, develop, provide content	✓	✓	
Select instructors	✓	✓	
Select educational methodology	✓	✓	
Contribute funds or in-kind support for CE	✓	✓	✓
Purchase ad or exhibit space	✓	✓	✓

* Effective July 1, 2023

† Joint provider that is NOT commercial interest

Commercial supporter

Commercial interests which contribute unrestricted financial support, products, and other resources to support or offset expenses and/or needs associated with a provider's continuing dental education activity.

- *CERP Glossary*

Commercial support

Financial or in-kind support for a CE activity from a commercial interest is acceptable if:

- Support is unrestricted—**supporter must not direct content or speakers** (V.8)
- Signed letter of agreement stating terms (V.7)
- Must be disclosed (V.8)

Advertising and exhibits

- Not considered commercial support
- Paid marketing opportunity in conjunction with CE programs
 - Must be kept separate from CE (V.3)
 - Separate space
 - No marketing/advertising within CE activities
 - Advertisers/exhibitors have no influence on CE programming (V.8)

Independence: Managing conflicts of interest

Providers must

- Obtain signed disclosures of relevant financial relationships from advisory committee, planners, instructors (V.12)
- Take steps to protect against conflicts of interest they may have (V.13)
- Publish disclosures of relevant financial relationships (V.14)



Relevant financial relationship

- Financial or other relationship with commercial interest relevant to subject matter of CE activity
- Within the last 12 months
- Includes immediate family members' relationships

- *CERP Glossary*

Conflict of interest

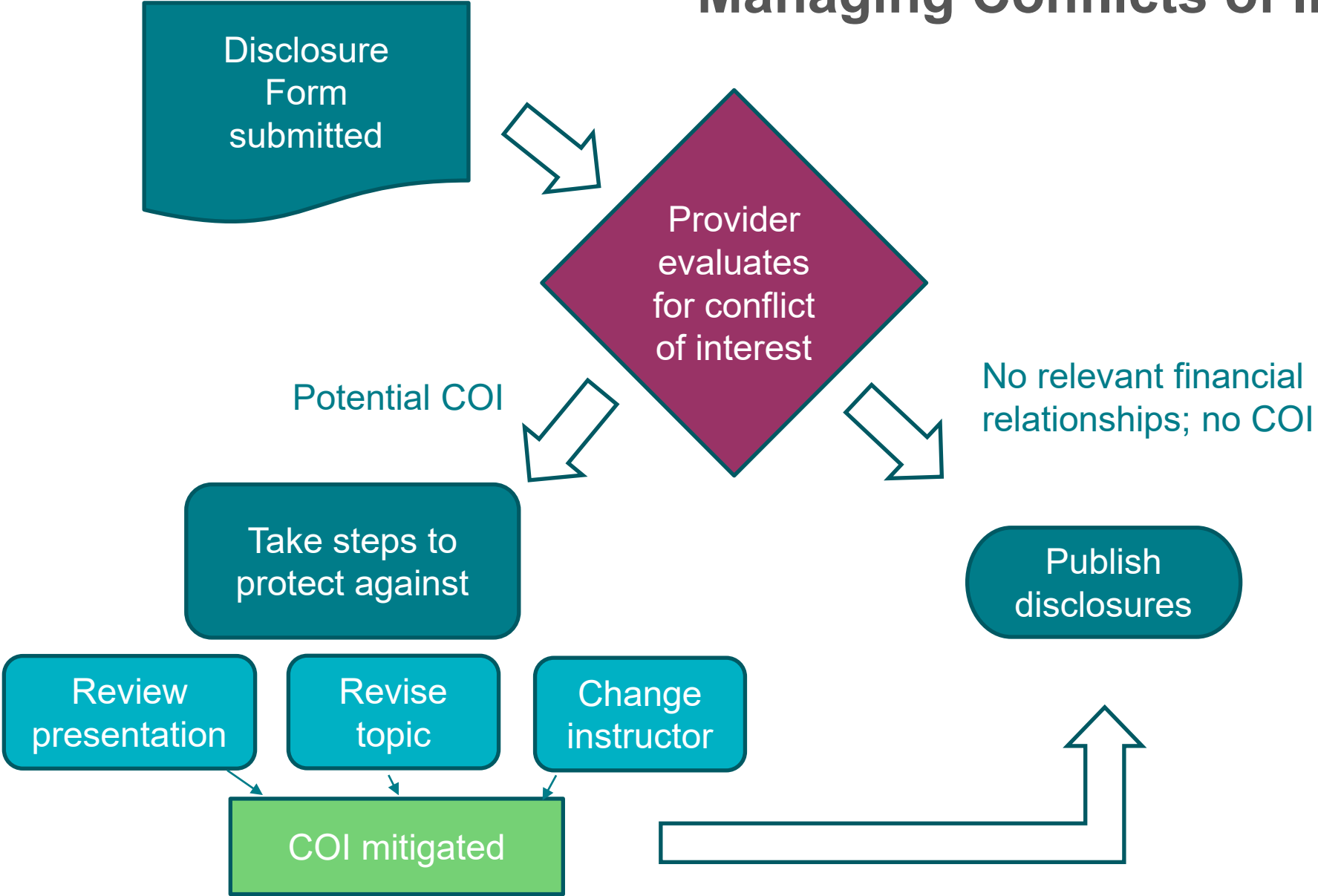
When an individual has an opportunity to affect the content of continuing dental education activities regarding products or services of a commercial interest with which he/she has a financial relationship.

- *CERP Glossary*

Mitigating COI

- Provider identifies whether individual has:
 - Vested interest in product or service? (employee, owner, equity share of commercial interest?)
 - Other financial relationship with commercial interest relevant to individual's role in program?
- If yes, provider takes steps to mitigate COI, for example:
 - Review presentation in advance
 - Adjust topic to remove conflict
 - Identify new instructor if necessary

Managing Conflicts of Interest



Published disclosures (V.14)

Who

- All instructors, planners

What

- Name, company, relationship
- If no relevant financial relationships:
“No relevant financial relationships to disclose”

Where

- Brochure, program guide, presentation slides, handouts
- Verbal disclosure alone is insufficient

ADA CERP Recognition

Mary Borysewicz
Director, CCEPR

Disclosure: No relevant financial relationships.

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The planners and staff of the Institute have no financial relationships that may create a conflict of interest.

Dr. Abernathy has served as a consultant to Company X.

Ensuring independence in practice

- CE provider's formal policies
 - CE will be developed and presented independent of commercial influence
 - Acceptable forms of commercial support
 - Separation of CE from marketing activities
- Communications to instructors/planners
 - Letters of agreement, written guidelines
- Process for identifying and mitigating COI
 - Planners and instructors

Resources

- CCEPR.ADA.org/resources-for-ce-providers
 - Examples of documents for managing commercial conflicts of interest
 - Glossary
 - Links
 - Map of state CE requirements
 - ACCME toolkit for CE providers

CE Educator's Toolkit

Evidence-based design and implementation strategies
for effective continuing education



[ACCME.org/ceeducatorstoolkit](https://www.accme.org/ceeducatorstoolkit)

Thank you!

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Questions?