

## COMMERCIAL INTEREST SELF-ASSESSMENT QUESTIONS

ADA CERP defines commercial interests as:

(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.

In April 2019 the Commission for Continuing Education Provider Recognition revised the CERP Eligibility Criteria stating that effective July 1, 2023, commercial interests will no longer be eligible for ADA CERP recognition. Read more about the [CERP Eligibility Criteria](#).

The following questions were developed to help providers determine whether or not they fall under the ADA CERP definition of a commercial interest.

*The words “you” and “your organization” below refer to the CE provider. In cases where the CE provider is an individual, “you” means the individual, the provider’s advisory committee, and any personnel who provide direction and input to the provider’s CE programming.*

1. Do you, your organization, or a part of your organization, produce, market, re-sell, or distribute health care goods or services consumed by or used on patients?

*(Note that providing clinical service directly to patients, as a clinician or dental practice, is not considered producing, marketing re-selling or distributing health care goods or services unless you also produce, market, re-sell, or distribute health care goods or services consumed by or used on patients.)*

- a. If your organization is a dental laboratory, do you produce, market, re-sell or distribute health care goods or services consumed by or used on patients in addition to the custom fabrications you produce based on clinicians’ work authorizations?

2. Does your organization have a parent company that produces, markets, re-sells, or distributes health care goods or services consumed by, or used on, patients? (A “parent company” is a separate legal entity that owns or fiscally controls the CE provider.)

3. Do you or your organization advocate for a commercial interest?

*(Advocating may include promoting, supporting, recommending or marketing activities for a commercial interest. Note, however, that accepting paid advertisements, selling commercial exhibit space, and accepting commercial support, if these are managed in accordance with ADA CERP Standards 3.4 and 3.5, are not considered advocating for a commercial interest.)*

4. Does your organization have a parent company that advocates for a commercial interest?

5. Are you or any of the officers in your organization a compensated employee of any company that produces, markets, re-sells, or distributes dental or health care goods, products, or services that are consumed by, or used on, patients?

6. Does your organization have a sister company that produces, markets, re-sells, or distributes health care goods or services consumed by, or used on, patients? (A “sister company” is a separate legal entity which has the same parent company as the provider, and which maintains a governance structure and activities separate from both the parent company and the provider.)

- a. Does your organization’s sister company control or direct, in whole or in part, your CE operations?

If a provider answered yes to any of Questions 1-5 or 6a above, they would likely be considered a commercial interest and would not be eligible for CERP recognition after June 30, 2023.