

**ADA CERP**  
**STANDARD V. COMMERCIAL OR PROMOTIONAL CONFLICT OF INTEREST**  
**TOOLKIT**

ADA CERP recognized providers have an essential role in ensuring that dental professionals have access to learning and skill development activities that are trustworthy and are based on best practices and high-quality evidence. These activities must serve the needs of patients and not the interests of industry. ADA CERP Standard V outlines the steps providers must take to help ensure that CE is independent of commercial bias.

This document includes some examples of the documents a provider may use and the steps needed to help ensure that CE is developed and implemented independent from commercial interests. The Commission for Continuing Education Provider Recognition offers these examples as resources for providers of continuing dental education. Providers may adapt these documents to the specific requirements of their individual programs. The use of these forms is optional.

**CONTENTS**

ADA CERP Standard V .....	2
Definitions .....	5
CE Provider policy for managing commercial support and conflicts of interest (example) .....	6
Letter of agreement for commercial support of a CE activity (example).....	8
Published disclosure of commercial support (examples) .....	10
Steps for identifying and mitigating relevant financial relationships .....	11
Flowchart for identifying and mitigating potential commercial conflicts of interest.....	12
Letter to planners, instructors and authors regarding disclosure (example).....	13
Financial disclosure form for planners and instructors (example).....	14
Published disclosure of relevant financial relationships (examples).....	16

*Some documents in this toolkit are adapted with permission from the Accreditation for Continuing Medical Education’s Toolkit for the Standards for Integrity and Independence in Accredited CE. Providers are encouraged to review and make use of the ACCME toolkit and other resources available at <https://accme.org/resource/standards-for-integrity-and-independence-accredited-continuing-education-toolkit/>.*

## ADA CERP RECOGNITION STANDARDS AND PROCEDURES (Excerpt)

### STANDARD V. COMMERCIAL OR PROMOTIONAL CONFLICT OF INTEREST \_\_\_\_\_

In 1997 the U.S. Food and Drug Administration (FDA) issued a policy statement entitled “Guidance for Industry: Industry Supported Scientific and Educational Activities.” This policy states that activities designed to market or promote the products of a commercial company (staffed exhibits, live presentations, advertisements, sales activities) are subject to FDA regulation under the labeling and advertising provisions of the Federal Food, Drug and Cosmetic Act.

Activities that are independent of commercial influence and non-promotional are not subject to FDA regulation. In this context, the ADA CERP standards and criteria are designed to ensure separation of promotional activities from continuing dental education (CDE) activities in the following ways: 1) CDE providers must demonstrate that all educational activities offered are independent of commercial influence, either direct or indirect, and 2) CDE providers must ensure that all financial relationships between the provider and commercial entities, as well as all financial relationships between course planners and faculty and commercial entities are fully disclosed to participants.

#### CRITERIA

1. CDE providers must assume responsibility for ensuring the content quality and scientific integrity of all continuing dental education activities. Educational objectives, content development, and selection of educational methods and instructors must be conducted independent of commercial interest.
2. CDE providers must ensure that continuing dental education activities promote improvements in oral healthcare and not a specific drug, device, service or technique of a commercial entity.\*
3. Product-promotion material or product-specific advertisement of any type is prohibited in or during continuing dental education activities. Live promotional activities (staffed exhibits, presentations) or enduring promotional activities (print or electronic advertisements) must be kept separate from CDE. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided during CDE activities.\*
  - a. For live, face-to-face CDE, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CDE activity. Providers cannot allow representatives of commercial interests to engage in sales or promotional activities while in the space or place of the CDE activity.
  - b. For print CDE activities, advertisements and promotional materials will not be interleaved within the pages of the CDE content. Advertisements and promotional materials may face the first or last pages of printed CDE content as long as these materials are not related to the CDE content they face and are not paid for by the commercial supporters of the CDE activity.
  - c. For electronically mediated/computer based CDE activities, advertisements and promotional materials will not be visible on the screen at the same time as the CDE content and not interleaved between computer ‘windows’ or screens of the CDE content
  - d. For audio and video-based CDE activities, advertisements and promotional materials will not be included within the CDE. There will be no ‘commercial breaks.’
  - e. Educational materials that are part of a CDE activity, such as slides, abstracts and handouts, cannot contain any advertising, trade name or a product-group message.
  - f. Print or electronic information distributed about the non- CDE elements of a CDE activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product promotion material or product-specific advertisement.

*\* Adapted from the Accreditation Council for Continuing Medical Education Standards for Commercial Support.*

4. CDE providers that also offer activities designed to promote drugs, devices, services or techniques must clearly disclose the promotional nature of the activity in publicity materials and in the activity itself. Promotional activities must not be designated for CDE credit. The CDE hours awarded must not include the promotional hours.
5. CDE providers must operate in accordance with written guidelines and policies that clearly place the responsibility for program content and instructor/author selection on the provider. These guidelines must not conflict with ADA CERP standards and criteria for recognition. Each CDE learning experience offered must conform to this policy.
6. The ultimate decision regarding funding arrangements for continuing dental education activities must be the responsibility of the CDE provider. Continuing dental education activities may be supported by funds received from external sources if such funds are unrestricted. External funding must be disclosed to participants in announcements, brochures or other educational materials, and in the presentation itself.
7. CDE providers receiving commercial support must develop and apply a written statement or letter of agreement outlining the terms and conditions of the arrangement and/or relationship between the provider and the commercial supporter.
8. Arrangements for commercial exhibits or advertisements must not influence planning or interfere with the presentation, nor can they be a condition of the provision of commercial support for CDE activities.\*
9. CDE providers must disclose to participants any monetary or other special interest the provider may have with any company whose products are discussed in its CDE activities. Disclosure must be made in publicity materials and at the beginning of the educational activity.
10. CDE providers must ensure that a balanced view of all therapeutic options is presented in CDE activities. Whenever possible, generic names must be used to contribute to the impartiality of the program presented.
11. CDE providers must assume responsibility for the specific content and use of instructional materials that are prepared with outside financial support.
12. CDE providers must assume responsibility for taking steps to protect against and/or disclose any conflict of interest of the advisory committee, CDE activity planners, course directors and instructors/authors involved in planning or presenting courses. Signed conflict of interest statements must be obtained from all advisory committee members, CDE activity planners, course directors and instructors/authors.
13. The advisory committee must be involved in evaluating and taking steps to protect against conflicts of interest that CDE activity planners, course directors and instructors/authors may have.
14. Providers must disclose to participants in CDE activities any relevant financial relationships that the planners and instructors/authors of a continuing education activity may have that may create conflicts of interest. Disclosure must include the name of the individual, the name of the commercial entity, and the nature of the relationship the individual has with each commercial entity. Disclosure must not include the use of a trade name or product message. For individuals that have no relevant financial relationships, the provider must disclose to participants that no relevant relationships exist. Disclosure must be made before the start of the continuing education activity and must be made in writing, either in publicity materials, course materials, or audiovisual materials.

*\* Adapted from the Accreditation Council for Continuing Medical Education Standards for Commercial Support.*

## RECOMMENDATIONS

- A. The following are examples of outside or commercial support that is customary and proper:
  - Payment of reasonable honoraria
  - Reimbursement of out-of-pocket expenses for instructors/authors
  - Modest meals or social events held as part of the educational activity
- B. The CE provider and the commercial supporter or other relevant parties should each report to the other on the expenditure of funds each has provided, following each subsidized continuing dental education activity.

## **ADA CERP Definitions**

### **Commercial Interest**

An individual or entity that produces, markets, resells 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.

### **Relevant Financial Relationships**

For a person involved in the planning, administering or presentation of a continuing dental education activity, ADA CERP considers relevant financial relationships to be financial relationships in any amount, occurring in the last 12 months, that are relevant to the content of the CE activity and that may create a conflict of interest. ADA CERP considers relevant financial relationships of the person involved in the CE activity to include financial relationships of a family member.

### **Conflicts of interest**

ADA CERP considers that a conflict of interest may exist 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.

## EXAMPLE OF PROVIDER POLICY ON MANAGING COMMERCIAL CONFLICTS OF INTEREST

### **[CE Provider Name]** **Guidelines Regarding Management of Commercial Support and Commercial Conflicts of Interest in CE Activities**

[CE Provider Name], in planning continuing education activities, will adhere to the following policies, in accordance with ADA CERP Recognition Standards and Procedures:

#### **Independence from commercial interest**

[CE Provider Name] shall:

1. Be responsible for the content, quality, and scientific integrity of all CE activities.
2. Be responsible for selecting instructors/authors for all CE activities. Commercial interests may not have any role in the planning or implementation of CE activities.
3. Select CE topics based on perceived needs for professional information and not for the purpose of endorsing specific commercial drugs, materials, products, treatments, or services.
4. Assure that presentations give a balanced view of all therapeutic options.
5. Be responsible for making ultimate decisions regarding funding arrangements for CE activities.
6. Instruct presenters/authors to avoid recommending or mentioning commercial products by trade name, using generic terms whenever possible; when reference is made to a specific product by its trade name, reference shall also be made to competitive products.

#### **Identifying and mitigating commercial conflicts of interest of planners and instructors**

[CE Provider Name] shall:

7. Require course planners, instructors/authors to disclose in writing in advance of any CE activity any financial relationships that they or their immediate family members may have had with commercial companies in any amount occurring in the last 12 months that are relevant to the content of the CE activity.
8. Review disclosures to identify any potential conflicts of interest that those in a position to control the content of CE activities, such as planners and instructors, may have; and take steps to mitigate any conflicts identified through this process to ensure that those with conflicts of interest do not control CE content.
9. Publish planners' and instructors' relevant financial relationships in course materials available to participants before the start of the CE activity.

#### **Commercial support**

[CE Provider Name] may accept support from commercial interests (commercial support) for its CE activities, subject to the following requirements:

10. Commercial support may be in the form of funds or in-kind support (such as donated supplies or equipment) in support of any educational programs.
11. Commercial support must be unrestricted and [CE Provider Name] shall retain exclusive rights regarding the selection of presenters, instructional materials, program content and format, etc.
12. Commercial support of CE activities must be given by the supporting company to [CE Provider Name]. The supporting company may not make payments directly to any planner or instructor in a CE activity.
13. All commercial support must be documented in a letter of agreement signed by authorized representatives of the supporting company and [CE Provider Name]. The letter of agreement must state the nature of the support, including the dollar amount of any grants, and must confirm the supporting company's agreement that it may have no role in suggesting or selecting CE topics, content or instructors.

14. Any and all commercial support received shall be acknowledged in program announcements, brochures, and the on-site program book. Disclosure of support received must not include any product names or marketing messages.

**Advertising and marketing activities in conjunction with CE activities:**

[CE Provider Name] may choose to make available paid opportunities for commercial interests to advertise their products or services subject to the following requirements:

14. Commercial exhibits will not influence planning for nor interfere with the presentation of CE activities.
15. Commercially supported social events held in conjunction with CE activities must not compete with, nor take precedence over, the educational events.
16. Product-promotion materials or product-specific advertisements of any type are prohibited in or during continuing dental education activities:
  - a. For live activities, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CE activity; representatives of commercial interests may not engage in sales or promotional activities while in the space or place of the CE activity.
  - b. For print CE activities, advertisements and promotional materials will not be interleaved within the pages of the CE content. Advertisements and promotional materials may face the first or last pages of printed CE content as long as these materials are not related to the CE content they face and are not paid for by the commercial supporters of the CE activity.
  - c. For electronically mediated/computer based CE activities, advertisements and promotional materials will not be visible on the screen at the same time as the CE content and not interleaved between computer 'windows' or screens of the CE content
  - d. For audio and video-based CE activities, advertisements and promotional materials will not be included within the CE. There will be no 'commercial breaks.'
  - e. Educational materials that are part of a CE activity, such as slides, abstracts and handouts, cannot contain any advertising, trade name or a product-group message.
  - f. Print or electronic information distributed about the non- CE elements of a CE activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product promotion material or product-specific advertisement.

**EXAMPLE OF LETTER OF AGREEMENT FOR COMMERCIAL SUPPORT**

**[CE Provider Name]**

**LETTER OF AGREEMENT FOR COMMERCIAL SUPPORT OF  
CONTINUING EDUCATION ACTIVITIES**

Regarding Terms, Conditions and Purposes of an Educational Grant between \_\_\_\_\_ (Provider),  
an ADA CERP approved provider of continuing dental education, and  
\_\_\_\_\_(Company) for support of a continuing dental education (CE) activity.

Title of CE Activity: \_\_\_\_\_

Location: \_\_\_\_\_ Date(s) \_\_\_\_\_

Company (Commercial Supporter): \_\_\_\_\_

Contact Person: \_\_\_\_\_

Title: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

The above company wishes to provide support for the continuing education activity named above by means of (indicate which option):

1. Unrestricted educational grant in the amount of: \$ \_\_\_\_\_
2. Support for catering functions in the amount of: \$ \_\_\_\_\_
3. In-kind support (e.g., donation or loan of equipment, supplies, etc.) described below:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONDITIONS**

1. Statement of Purpose: program is for scientific and educational purposes only and will not promote the Company's products, directly or indirectly.
2. Control of Content and Selection of Presenters and Moderators: The Provider is solely responsible for selection of course content, instructors and moderators based on their qualifications, independence and balance. The Company will not suggest topics, content, instructors or speakers, or direct the content of the program in any way.
3. Disclosure of Financial Relationships: The Provider will ensure meaningful disclosure to the audience at the time of the program, of (a) Company funding and (b) any significant relationship between the Provider and the Company (e.g., grant recipient).
4. Involvement in Content: the Company may not provide any presentation materials such as slides, and there will be no "scripting", emphasis, or direction of content by the Company or its agents.
5. Ancillary Promotional Activities: No promotional activities will be permitted in the same room as the educational activity. No product advertisements will be permitted in the same room as the educational activity.



6. Objectivity and Balance: The Provider will make every effort to ensure that data regarding the Company's products (or competing products) are objectively selected and presented, with favorable and unfavorable information and balanced discussion of prevailing information in the product(s) and/or alternative treatments.
7. Limitations on Data: The Provider will ensure, to the extent possible, meaningful disclosure of limitations on data, e.g., ongoing research, interim analyses, preliminary data, or unsupported opinion.
8. Opportunities for Debate: The Provider will ensure meaningful opportunities for questioning or scientific debate.
9. Independence of the Provider in the use of Contributed Funds:
  - a. funds are to be in the form of an educational grant made payable to Provider;
  - b. all other support associated with this CE activity (e.g., educational materials, course supplies, etc.) must be given with the full knowledge and approval of Provider;
  - c. no funds from the company will be paid directly to the program director, instructor/author, or others involved with the CE activity.
10. The Provider and the Company agree to abide by all the requirements of the ADA CERP Recognition Standards.
11. The Provider shall acknowledge educational support from the Company in program brochures, syllabi, and other program materials
12. Upon request, the Provider shall furnish the Company with a report concerning the expenditure of the funds provided.

AGREED

Company Name: \_\_\_\_\_

Company Representative: \_\_\_\_\_

Company Address: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

CE Provider Name: \_\_\_\_\_

CE Provider Representative: \_\_\_\_\_

CE Provider Address: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## EXAMPLES OF PUBLISHED DISCLOSURE OF COMMERCIAL SUPPORT

### **Standard V.6**

The ultimate decision regarding funding arrangements for continuing dental education activities must be the responsibility of the CE provider. Continuing dental education activities may be supported by funds received from external sources if such funds are unrestricted. External funding must be disclosed to participants in announcements, brochures or other educational materials, and in the presentation itself.

If the CE provider accepts support from a commercial company for a CE activity, it must disclose this to learners. Disclosure of commercial support may be published in course brochures, program guides, signs, introductory slides, etc. Disclosure must include the name of the company and may include the company logo. Disclosure may *not* include product names or product group messages.

#### **Example 1.**

*[Name of provider] gratefully acknowledges the generous support of XYZ Company.*

#### **Example 2.**

*Support for this activity provided by the XYZ Company.*

#### **Example 3.**

*[Name of provider] wishes to thank the following companies  
for their generous support of this program:*

*XYZ Company  
ABC Products*

**Note:** Paid advertising, such as sales of pages in a program book, or display banners, for example, are not considered commercial support. Guidelines for managing advertising in association with CE activities are discussed in Standard V.3.

Similarly, exhibit booths where companies pay a flat fee to exhibit their products in a booth or a table top display (in a separate space from the CE activity), are not considered commercial support. These should be considered separate advertising or marketing opportunities, and should not influence the planning, content, or presentation of CE activities. Guidelines for managing exhibits are discussed in Standards V.3 and 8.

## IDENTIFYING AND MITIGATING RELEVANT FINANCIAL RELATIONSHIPS

### Standard V.12

CDE providers must assume responsibility for taking steps to protect against and/or disclose any conflict of interest of the advisory committee, CDE activity planners, course directors and instructors/authors involved in planning or presenting courses. Signed conflict of interest statements must be obtained from all advisory committee members, CDE activity planners, course directors and

### Standard V.13

The advisory committee must be involved in evaluating and taking steps to protect against conflicts of interest that CDE activity planners, course directors and instructors/authors may have.

ADA CERP recognized providers must take steps to ensure that those in control of CE content, such as planning committee members, staff, instructors, or authors, do not themselves have any relevant financial relationships with commercial interests that might create a conflict of interest.

#### 1. **Collect information about financial relationships**

All who may have a role in controlling the CE content are asked to disclose all financial relationships they have had over the past 12 months with commercial interests (see page 5 for CERP definitions).

#### 2. **Exclude owners or employees of ineligible companies**

Owners or employees of commercial interests may be ineligible to act as planners or instructors of CE activities because of the opportunity to introduce commercial bias. The following exceptions are situations where owners or employees of a commercial interest may be eligible to act as instructors:

- Content of the CE is not related to the business lines or products of their employer/company.
- Content of the CE is limited to basic science research (e.g., preclinical research and drug discovery), methodologies of research, and no care recommendations are given.
- Participating as technicians to teach the safe and proper use of medical devices, do not recommend whether or when a device is used.

#### 3. **Identify and mitigate relevant financial relationships**

Provider reviews financial disclosures and determines which financial relationships might allow control of CE content related to the business lines or products of an ineligible company and takes steps to prevent the insertion of bias towards commercial products or services.

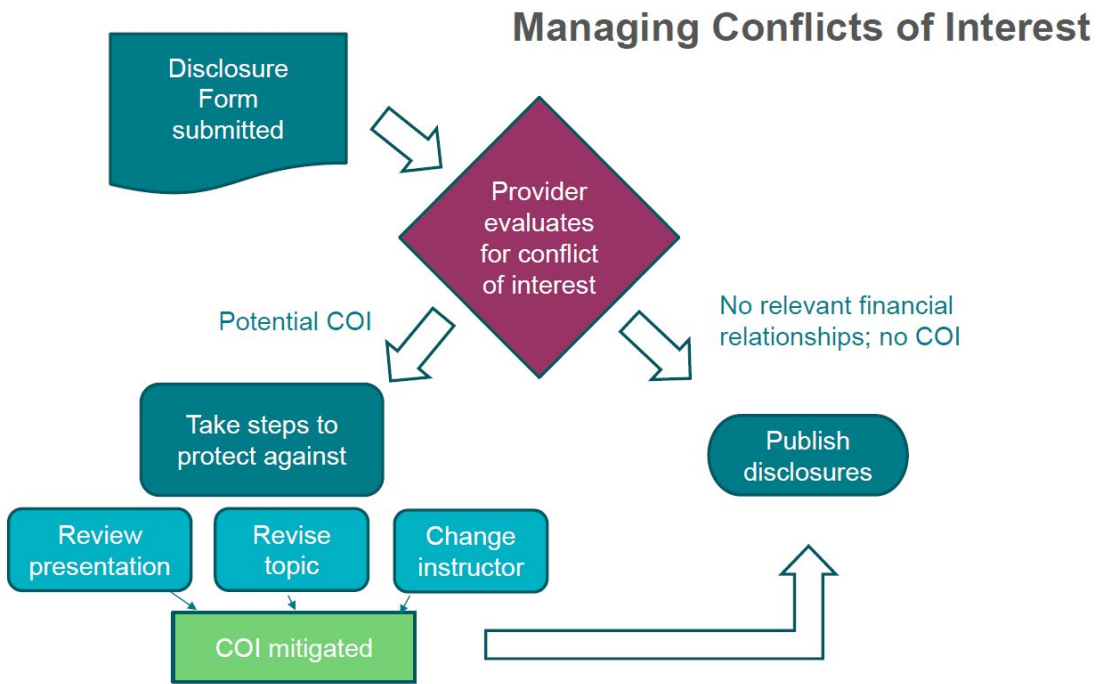
Is the financial relationship relevant to the content? Is the content of the CE activity that the person can control related to the products or business lines of the ineligible company? If yes, possible options to mitigate relationship include:

- End the financial relationship
- Recuse individual from controlling aspects of planning and content with which there is a financial relationship.
- Peer review of content by persons without relevant financial relationships.
- Attest that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines).

#### 4. **Disclose all relevant financial relationships to learners**

The presence or absence of relevant financial relationships for all who were in control of the CE content is disclosed to all learners before the CE activity.

FLOWCHART FOR MITIGATING INSTRUCTORS AND PLANNERS CONFLICTS OF INTEREST



## EXAMPLE OF LETTER TO CE PLANNERS, INSTRUCTORS AND AUTHORS

Dear **Prospective Planner/Faculty Member**:

We are looking forward to having the opportunity to include you as a **<proposed role for person—e.g. planner, faculty, reviewer, etc...>** in the continuing education activity, **<Insert activity title or working title and date/location information, if appropriate>**.

### **Why am I receiving this communication?**

**<Insert Provider Name>** is an ADA CERP recognized provider. We appreciate your help in partnering with us to follow recognition standards and help us create high-quality education that is independent of industry influence. In order to participate as a person who will be able to control the educational content of this accredited CE activity, we ask that you disclose all financial relationships with commercial interests that you have had over the past 12 months.

ADA CERP defines a commercial interest as an entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients, or an entity that is owned or controlled by an entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

You must disclose all financial relationships, regardless of the amount, with commercial interests. We ask you to disclose regardless of whether you view the financial relationships as relevant to the education. For more information on ADA CERP Recognition Standards, please visit [CCEPR.ada.org](http://CCEPR.ada.org).

### **Why do we collect this information?**

Since healthcare professionals serve as the trusted authorities when advising patients, they must protect their learning environment from industry influence to ensure they remain true to their ethical commitments. Many healthcare professionals have financial relationships with commercial interests. By identifying and mitigating relevant financial relationships, we work together to create a protected space to learn, teach, and engage in scientific discourse free from influence from organizations that may have an incentive to insert commercial bias into education.

### **What are the next steps in this process?**

After we receive your disclosure information, we will review it to determine whether your financial relationships are relevant to the education. Please note: the identification of relevant financial relationships does not necessarily mean that you are unable to participate in the planning and implementation of this educational activity. Rather, the accreditation standards require that relevant financial relationships are mitigated before you assume your role in this activity.

To help us meet these expectations, please use the form we have provided to share all financial relationships you have had with commercial interests during the past 12 months. This information is necessary in order for us to be able to move to the next steps in planning this continuing education activity.

**EXAMPLE OF DISCLOSURE FORM**

[Provider Name or Logo]  
**DISCLOSURE OF RELEVANT FINANCIAL RELATIONSHIPS**

Name of Individual: <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> Title of Continuing Education: <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> Date and location of Education: <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/>	Individual's prospective role(s) for CE activity  <input type="checkbox"/> Planner Examples: <i>planning committee, staff</i> <input type="checkbox"/> Instructor, teacher, faculty <input type="checkbox"/> Author, writer <input type="checkbox"/> Reviewer <input type="checkbox"/> Other _____
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**INSTRUCTIONS:** As a prospective planner or faculty member, we would like to ask for your help in protecting our learning environment from commercial influence. Please complete the form below and return it to \_\_\_\_\_ by \_\_\_\_\_.

ADA CERP Recognition Standards requires those in a position to control the content of a CE activity to disclose any financial relationships (including those of immediate family members) with commercial interests within the last 12 months. [Provider Name] will evaluate this information for conflicts of interest and may, at its discretion, make changes to the CE activity to reduce the possibility for conflict of interest. Failure to disclose will require [Provider Name] to remove you from the program and to identify a replacement for your participation.

Please disclose all financial relationships that you have had in the past 12 months with commercial interests (see definition below). For each financial relationship, enter the name of the company and the nature of the financial relationship(s). There is no minimum financial threshold; we ask that you disclose all financial relationships, regardless of the amount, with any commercial interests.

<b>Name of Company</b> Any entity which produces, markets, sells, re-sells, or distributes healthcare products used by or on patients.	<b>Nature of Financial Relationship</b> Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.	<b>Has the Relationship Ended?</b> If the financial relationship existed during the last 24 months, but has now ended, please check the box in this column.
Example: ABC Company	Consultant	X
<input type="checkbox"/> In the past 12 months, I have not had any financial relationships with any commercial interests.		

I attest that the above information is correct as of this date of submission.

Signature \_\_\_\_\_

Date \_\_\_\_\_

### **ADA CERP Definitions**

#### **Commercial Interest**

An individual or entity that produces, markets, resells 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.

#### **Relevant Financial Relationships**

For a person involved in the planning, administering or presentation of a continuing dental education activity, ADA CERP considers relevant financial relationships to be financial relationships in any amount, occurring in the last 12 months, that are relevant to the content of the CE activity and that may create a conflict of interest. ADA CERP considers relevant financial relationships of the person involved in the CE activity to include financial relationships of a family member.

#### **Conflicts of interest**

ADA CERP considers that a conflict of interest may exist 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.

## EXAMPLES OF PUBLISHED DISCLOSURE OF PLANNERS' AND INSTRUCTORS' FINANCIAL RELATIONSHIPS

### Standard V.14

Providers must disclose to participants in CE activities any relevant financial relationships that the planners and instructors/authors of a continuing education activity may have that may create conflicts of interest. Disclosure must include the name of the individual, the name of the commercial entity, and the nature of the relationship the individual has with each commercial entity. Disclosure must not include the use of a trade name or product message. For individuals that have no relevant financial relationships, the provider must disclose to participants that no relevant relationships exist. Disclosure must be made before the start of the continuing education activity and must be made in writing, either in publicity materials, course materials, or audiovisual materials.

**RELEVANT FINANCIAL RELATIONSHIPS:** For a person involved in the planning, administering or presentation of a continuing dental education activity, relevant financial relationships are financial relationships in any amount, occurring in the last 12 months, that are relevant to the content of the CE activity and that may create a conflict of interest. ADA CERP considers relevant financial relationships of the person involved in the CE activity to include financial relationships of a family member. Relevant financial relationships must be disclosed to participants in CE activities.

--CERP Glossary

CE providers must also publish information on any relevant financial relationships that **individual instructors and CE planners** may have. This is **in addition** to disclosure of any commercial support the CE provider has received. This information is usually gathered via the Disclosure of Relevant Financial Relationships form that providers collect from instructors and planners.

Disclosure must be published *in writing* before the start of the CE activity. Possible options for publishing disclosure information include:

- Course handouts
- Program guides
- Course brochures and catalogues
- Introductory presentation slides

Disclosure must include:

1. Speaker/planner name
2. Name of company
3. Nature of relationship

Disclosure *must not* include:

- Product name or product message



The following are provided as a few possible examples of disclosures that comply with the ADA CERP requirements for publishing disclosures of relevant financial relationships.

**Example 1. Published list (course handout, program guide, course catalogue, etc.)**

**Instructors**

Dr. Ephraim Smith: *No relevant financial relationships to disclose.*

Dr. Martina Gonzalez: *Research grants from XYZ Company; consultant fees from ABC Corp; speaker fees from Widget Manufacturing.*

**CE Planning Committee**

*Members of the CE planning committee have no relevant financial relationships to disclose.*

**Example 2: Speaker bio (course brochure, program book, course catalogue, handout, etc.)**

**Dr. Qian Li** is associate professor in the department of periodontology at State University. Dr. Smith earned his dental degree from ABC University School of Dentistry and completed his residency in periodontology at XYZ University.

*Dr. Li has no financial relationships relevant to this presentation to disclose.*

**Example 3: Introductory presentation slides**

**Ephraim Smith, DDS**  
**Associate professor, periodontology**  
**State University**

*Financial disclosure: Paid consultant for XYZ Company*

**Martina Gonzalez, DMD**  
*Neither I nor members of my immediate family have any financial interests to disclose relating to the content of this presentation.*