

Optometric Guidelines for Independent Continuing Education

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Introduction

Continuing education is an integral and essential element of the profession of Optometry. In addition to being a requirement for relicensure by every state board of optometry, this education is vital to professionals as they pursue the process of life-long learning. Continuing education enables doctors to provide state-of-the-art eye care to their patients, as they are kept abreast of innovations in technology, pharmacology and management modalities. Whatever the subject matter or venue, maintaining an independent learning environment for doctors of optometry is of paramount importance.

The profession recognizes the valuable role that industry plays in providing information on their latest products and developments. As well, financial support by industry has long been an integral part of optometric education. Without such support, offering quality continuing education would become cost-prohibitive. Industry has already taken significant steps to separate educational grants from promotional activities, and most recognize that doctors and patients are better served with fair and balanced education. Education that promotes particular products serves a useful purpose as well, but needs to be presented in the context of a discussion on all products within the same or related categories. Doctors of optometry have little tolerance for one-sided “infomercials” thinly disguised as education. Financial support of a program has the potential to introduce such bias, which can threaten the scientific integrity of educational activities.

The purpose of this document is to establish voluntary guidelines for the profession to help ensure the independence of accredited optometric continuing education. It does not pertain to non-credit promotional activities of a particular product or products, which should be clearly identified as such from the outset. It is not meant to serve as a detailed set of enforceable rules and regulations. It is not meant to micro-manage the activities of speakers or providers of education. Rather, with the same intent as the PhRMA Code on Interactions with Healthcare Professionals, and the AdvaMed Code of Ethics, Optometry’s Guidelines for Independent Continuing Education are meant to help doctors, meeting planners, and

industry supporters alike create and administer quality educational programs in an era of increasing scrutiny.

Voluntary self-regulation and adherence to the guidelines by the entire optometric community is essential in order to create a culture of scientifically sound and commercially unbiased optometric education.

The Optometric Guidelines for Independent Continuing Education (ICE) are intended to be a blueprint to help guide organizations planning optometric education through their relationships with corporate supporters. These are separate from any rules that ARBO may establish regarding COPE-approved continuing education courses required by some state boards for re-licensure.

Representatives from the American Academy of Optometry (AAO), the American Optometric Association (AOA), the Association of Regulatory Boards in Optometry (ARBO), the Association of Schools and Colleges of Optometry (ASCO), and SECO International, LLC (SECO) formed the National Steering Committee on Optometric Guidelines for Independent Continuing Education. The Committee developed the following guidelines for optometric continuing education, including issues related to industry support, disclosure and advertising.

The Steering Committee acknowledges and appreciates the historical perspective and insights provided to this process from our industry partners.

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1. Independence of Continuing Education (ICE)

Meeting administrators are responsible for making decisions regarding educational activities they are providing, including:

- A. Educational needs of attendees
- B. Objectives
- C. Format and educational methods
- D. Content
- E. Speaker(s)
- F. Course evaluation tools
- G. Audience selection

2. Appropriate Commercial Support

Support for meetings is not only appropriate, but critical to the quality and affordability of optometric CE programs across the country. Support given to meetings of any type should be in the form of educational grants. Educational grants can be either monetary or in-kind support. Educational grants should not include conditions regarding speaker and audience selection, course objectives, format or content.

2.1 Administrators/providers must:

- A. Make all decisions regarding the disbursement of commercial support related to a specific event
- B. Determine appropriate honoraria and reimbursement policies
- C. Screen courses as best possible for fairness and balance
- D. Assure that educational content promotes improvements or quality in eyecare and healthcare, and not a specific product of a commercial interest
- E. Identify and resolve all conflicts of interest prior to the educational activity being delivered to the learner

2.2 For all continuing education programs, speakers must be paid by the administrator/provider only and never directly (in part or in full) by the industry supporter.

3. Promotion of Commercially Supported Education

Industry partners spend a significant amount of money in support of educational programs and exhibits at meetings, and should be recognized. However, that recognition must not compromise the content of the educational program. Promotional copy and activities must be kept appropriately separate from educational content and activities.

3.1 While discussion of products, drugs and instruments is inherent in most educational programs, materials, such as PowerPoint slides or handouts cannot contain any company advertising or blatant promotional messages. Discussion of off-label uses of such products is appropriate, but must be identified to the audience.

3.2 Distribution of company or product promotion materials, exhibit tables, or product specific advertisements of any type are prohibited inside the room where the educational venue is being held, or in an area outside the room where attendees are forced to walk past or visit.

3.3 Representatives of a company cannot engage in sales or promotional activities in the space while the CE activity is being held.

4. Disclosures Relevant to Potential Commercial Bias

In order to be fully transparent to the attendees of an educational program, any conflict of interest or the appearance of such a conflict shall be disclosed. This includes full disclosure of all financial relationships with any commercial interest as follows:

4.1 Everyone who is in a position to control educational content must disclose all personal financial relationships and family member financial relationships during the last 12 months, with any commercial interest related to eyecare.

4.2 Speakers must disclose to the audience all such relevant financial relationships, to include the following:

- The name of the commercial interest with which the individual has a financial interest
- The nature of the relationship the individual has with each interest
- The nature of the commercial interest with which the individual or family member has a financial interest
- Any participation on an industry speaker's bureau giving non-CE informational talks, especially when the same content is being covered in the CE program
- If there are no relevant financial relationships, that should be so stated.

4.3 All educational grants must be disclosed by the administrator to the audience.

4.4 All disclosures mentioned above should be made prior to the beginning of an educational program and displayed on the opening slide.

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ICE Definitions

Commercial Support:

Financial, or in-kind, contributions of any amount given by a commercial interest, which is used to pay all or part of the costs of a CE activity, or reduce the expenses of such activity.

Commercial Interest:

Any entity producing, marketing, reselling, or distributing health care goods or services consumed by, or used on, patients. This includes any consulting services related in any way to the ophthalmic industry.

Conflict of Interest:

A conflict of interest exists when an individual has an opportunity to introduce bias into a CE program related to products or services of a commercial interest with which he/she, or a member of his or her immediate family, has a financial relationship.

Financial Relationships:

Relationships in which the individual (or spouse, partner or family member) benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honorarium, ownership interest (e.g., stock, stock options, or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting (either as an employee or owner of a consulting company), speaking and teaching, membership on advisory or review panels, board membership, and other activities from which remuneration is received or expected. Equipment loaned to an individual or practice for evaluation for greater than 30 days constitutes a financial relationship as well.

Lecturer/Speaker:

An individual who develops and/or presents content for optometric continuing education.

Provider/Administrator/Meeting Planner:

Any individual, not for profit organization, or for-profit company that conducts optometric continuing education in any setting (face-to-face, web-based, in print, etc.) or formal lecture, workshop, seminar, symposium, grand rounds, peer review article or case report, etc.

Frequently Asked Questions

What is the purpose of these guidelines?

The Steering Committee that has drafted the guidelines, with representatives from AAO, AOA, ARBO, ASCO and SECO, has done so with the intent of creating a new culture in optometric continuing education. Promotional activities must be kept separate from educational activities, and while both serve a valuable purpose, the boundaries are sometimes confusing. Providers of education and industry alike plan to adopt the guidelines as a blueprint for ethical relationships between corporate supporters who provide funding for educational activities and the organizations that actually plan and put on those activities.

Are the Optometric Guidelines for Independent Continuing Education different than the ARBO/COPE Standards for Commercial Support?

Yes. The Optometric Guidelines are voluntary, profession-wide guidelines that will serve to guide the relationships between corporate supporters and the organizations that conduct continuing education activities for optometrists.

These are separate from any rules that ARBO may establish regarding COPE-approved continuing education courses and events required by some state boards for maintenance of licensure.

Do the ICE Guidelines indicate that a provider cannot ask a commercial interest for suggestions related to topics or speakers?

Correct. Inherent in the guidelines is the expectation that the provider makes all decisions related to the planning and implementation of CE, without being directed or influenced by commercial interests.

Can a commercial interest provide direct reimbursement of expenses related to CE activities?

No. The support must go to the provider or a provider's joint sponsor or a provider's educational partner.

Can a commercial supporter supplement their contributions to a CE program by additional direct payments to speakers or others involved in the program?

No. All commercial support must be stipulated by written agreement and must flow through the provider. Only the provider can make payments to speakers or others for their role in the CE activity.

Can a commercial supporter direct the content of CE?

No. The provider must ensure that the content of the CE truly remains beyond the control of the commercial supporter. The process to develop CE must be independent of the commercial interest. Providers must not allow commercial supporters to directly or indirectly *contribute to or* control the content of the CE.

I am an employee of a commercial interest, but also a speaker. Do the guidelines mean I can no longer speak at meetings?

Not necessarily. Course content that overlaps with promotional talks should be avoided, and every talk should be fair and balanced and without bias.

Can I talk about off label uses of drugs/ products?

Yes. As long as you disclose to the audience that the use you are discussing is off-label.

What is the best way to provide disclosure information on relevant financial relationships?

Every provider organization should have the speaker or committee member sign a disclosure statement. In addition, an opening disclosure slide should be presented to the audience prior to each and every lecture given.

Can an industry employee, consultant or representative be in the audience of an educational program, that is either sponsored by his/her company or the company of a competing sponsor?

Yes. However, those representatives should refrain from asking questions or offering comments. Questions may occasionally be directed by the speaker to the industry representative for specific factual content without commercial bias. The industry representative must first identify him or herself and his or her industry affiliation prior to answering the question. Furthermore, if the response shows evidence of anything other than specific factual answers to particular questions, it is the obligation of the speaker to stop the industry representative from speaking further.

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