### Joint Provider Corporate Disclosure

## *Background Information and Implications for Joint Providership*

## *ACCME Definition of Commercial Interest (effective, August 2007)*

A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.  The ACCME does not consider providers of clinical service directly to patients to be commercial interests.

A commercial interest is not eligible for ACCME accreditation.

**ACCME’s Definition of a Commercial Interest as It Relates to Joint Providership**

In joint providership the accredited provider and its non-accredited joint provider must have control of (a) identification of CME needs; (b) determination of educational objectives; (c) selection and presentation of content; (d) selection of all persons and organizations that will be in a position to control the content of the CME; (e) selection of educational methods; and (f) evaluation of the activity.

To maintain continuing education as independent from commercial interests, control of the above identified aspects of the activity cannot be in the hands of a commercial interest.

The ACCME will hold accredited providers accountable to the August 2007 revised definition of commercial interests. Under the ACCME’s definition of commercial interest, accredited providers will not be able to work in joint providership with non-accredited providers that produce, market, re-sell, or distribute health care goods or services consumed by, or used on, patients.

**MER Responsibility**

It is Medical Education Resources’ (MER’s) responsibility to ensure that all non-accredited organizations with which we collaborate are not commercial interests or owned or controlled by a commercial interest. To facilitate the determination of your eligibility to enter into a joint providership relationship with MER**,** we ask that you complete the following questionnaire and return it for our review.

**Joint Provider Organization Disclosure**

|  |  |  |  |
| --- | --- | --- | --- |
| Name |       | Tax ID |       |
| Address |       |
| City, State, ZIP |       |
| Telephone |       | Fax |       | Website |       |
| Contact |       | E-Mail |       |

**Organization overview**

* Is your organization involved in providing commercial or other company-directed activities or services for pharmaceutical companies, medical device manufacturers, nutraceutical or herbal supplement companies, etc., including but not limited to advertising/promotional services, publication planning, speaker bureau management, speaker training, and advisory board/consultant meeting planning?

[ ]  Yes [ ]  No

* Please provide a brief overview of your organization or attach a copy of your mission statement.

|  |
| --- |
|       |

* Does your organization advocate for an ACCME-defined commercial interest?

[ ]  Yes [ ]  No

### Organization Structure (Parent organization)

* A parent organization is defined as one that owns and fiscally controls another organization. In that context, do you have a parent organization?

[ ]  Yes [ ]  No

* If yes, please identify your parent organization.

|  |  |  |  |
| --- | --- | --- | --- |
| Name |       | Tax ID |       |
| Address |       |
| City, State, ZIP |       |
| Website |       |

* If applicable, please provide a brief overview of your parent organization or attach a copy of their mission statement.

|  |
| --- |
|       |

* The ACCME defines a commercial interest as “**any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.**” If applicable, do you believe that your parent organization is a commercial interest as defined by the ACCME?

[ ]  Yes [ ]  No [ ]  N/A

* Does your parent organization advocate for an ACCME-defined commercial interest?

[ ]  Yes [ ]  No

### Organization Structure (Sister companies)

* Is your organization part of a larger family of companies that is affiliated with any other organization(s) (i.e. do you have any sister companies)?

[ ]  Yes [ ]  No

* Is any organization (sister company) that you are affiliated with involved in providing commercial or other company-directed activities or services for pharmaceutical companies, medical device manufacturers, nutraceutical or herbal supplement companies, etc., including but not limited to advertising/promotional services, publication planning, speaker bureau management, speaker training, and advisory board/consultant meeting planning?

[ ]  Yes [ ]  No [ ]  N/A

If any affiliate (sister company) or subsidiary of your organization is involved in providing commercial or other company-directed activities for a commercial interest, you must have a corporate firewall in place to maintain independence in the development of content and implementation of continuing education activities. Therefore, please verify that your organization has guidelines and firewalls in place to provide for separation of continuing education and promotional staff (e.g. independent, non-overlapping management, distinct and separate staff responsible for the development of educational content, separate physical locations, different telephone and fax numbers and Internet domains for e-mail addresses, individual computer networks, etc.).

Please describe the elements of your firewall.

|  |
| --- |
|       |

* Does your affiliate (sister company) advocate for an ACCME-defined commercial interest?

[ ]  Yes [ ]  No

I hereby certify that the above information is correct and that MER will be immediately notified if any of the above information changes.

|  |  |  |  |
| --- | --- | --- | --- |
| Signature |  | Date |       |
|  |  |  |  |
| Print Name |       | Title |       |