

American Association of Hip and Knee Surgeons (AAHKS) Continuing Medical Education (CME) Mission, Policies and Procedures

Developed in Light of the ACCME Accreditation Requirements, including Standards for Integrity and Independence in Accredited Continuing Education

January 1, 2022

CME Mission and Program Improvement

Mission

AAHKS has a CME mission statement that includes expected results articulated in terms of changes in competence, performance, or patient outcomes that will be the result of the program. (Formerly Criterion 1)

AAHKS is dedicated to the lifelong learning of hip and knee surgeons (and allied health care professionals) and to the advancement of medicine through the science of the hip and knee surgery and allied disciplines. Continuing professional development is the foremost goal for the Association achieved through educational and scientific meetings, development and publication of clinical practice guidelines, and performance measures. The overall education program serves to improve participant competence, and/or performance, and/or patient outcomes in arthroplasty care. We expect that CME offered by AAHKS will result in:

- Fair, balanced, and high-quality content
- Achievement of the learning objectives
- Meeting the needs and bridging the professional practice gap(s) of the learners/members
- Practice change and perhaps change in patient outcomes
- Uncovering of (new) gaps in competence and skills

The educational program content areas include basic science, disease processes, state-of-the art technologies and techniques, patient safety, clinical research, evidence-based medicine, health outcomes, education, and practice management. Activities highlight current clinical practice and potential future practice. The overall education program is comprehensive and responsive to the needs of AAHKS members, assisting them in their lifelong learning and continuing self-assessment.

Types of activities:

- Live courses, i.e., AAHKS Annual Meeting, consisting of symposia, scientific paper presentations, and hands on training; AAHKS Spring Meeting, consisting of clinical case discussions in a small group setting.
- Enduring materials, based on the Annual Meeting.
- Live internet activities, i.e., Webinars

Program Analysis

AAHKS gathers data or information and conducts a program-based analysis on the degree to which the CME mission has been met through the conduct of CME activities/educational interventions. (Formerly Criterion 12)

AAHKS gathers data and conducts program-based analysis utilizing the following tools:

- Aggregation of activity metadata and learner demographic information
- Activity evaluation surveys (learner self-reported outcomes) and their summary reports
- Real time learner polling and their summary reports
- AAHKS member surveys (annual) and their summary reports
- CME Debrief Meetings (AAHKS Leadership), where the aggregate data and summary reports are discussed and analyzed.
- Other

Program Improvements

AAHKS identifies, plans, and implements the needed or desired changes in the overall program (e.g., planners, teachers, infrastructure, methods, resources, facilities, interventions) that are required to improve on ability to meet the CME mission. (Formerly Criterion 13)

AAHKS identifies, plans, and implements the needed or desired changes in the overall program through the following manner:

- AAHKS bases its program level changes on the data collected for program-based analysis.
- CME Debrief Meetings (AAHKS Leadership), where the aggregate data and summary reports are discussed and analyzed serve to identify changes and improvements to the program (including program planning, faculty, infrastructure, methods, resources, interventions, and the like)
- AAHKS Staff works with AAHKS leadership to implement the needed/desired changes

Educational Planning and Evaluation

Educational Needs

AAHKS incorporates into CME activities the educational needs (knowledge, competence, or performance) that underlie the professional practice gaps of their own learners. (Formerly Criterion 2)

All educational activities are planned based on the CME mission, ACCME criteria, adult learning principals and sound instructional design. AAHKS dedicates significant attention to CME activity planning, including the assessment of the educational needs that underlie the professional practice gaps of the learners.

AAHKS identifies the educational needs that underlie the professional practice gaps of the learners through:

- Needs assessment/Annual Membership Surveys
- Expert focus groups/interviews (e.g., Council on Education and Communication, Program Committee, faculty/expert panels, etc.)
- Individual activity evaluation summaries

- Learner Polling
- Recommendations from key leaders, based on observations in the arthroplasty surgeon community (in practice, teaching, assessment, etc.)
- Changes in standards, competencies and otherwise guidance by regulatory and professional membership organizations, such as ABMS, ABOS, AAOS, etc.
- Laws and government regulations (i.e., changes in health policy relevant to arthroplasty/CMS regulations)
- Evidence-based resources, such as national clinical guidelines and peer-reviewed literature (i.e., Journal of Arthroplasty).
- Other

In order to uncover a professional practice gap and determine resulting educational needs, current state of practice in arthroplasty care (various aspects, ranging from pre-operative care to surgery to post-operative care and to complications) is contrasted to the ideal state. The gap is then used to guide the development of the objectives for the overall CME program, as well as individual CME activities. With these items in place, AAHKS staff and the leadership then proceed to identifying the target audience (e.g., entire AAHKS membership, a specific membership category/segment) and select formats that not only appeal to the learning styles and preferences of the members, but also help deliver the educational content in the most efficient manner.

Example of knowledge gap:

- Lack of comprehensive knowledge of most current research study findings in hip and knee condition management.

Example of competence gap:

- Lack of clarity in the application of new surgical and non-surgical treatment options in hip and knee condition management, including the management of surgical complications.

Example of performance gap:

- Lack of practice analysis, e.g., case review and discussion for optimal hip and knee condition management.

Designed to Change

AAHKS generates activities/educational interventions that are designed to change competence, performance, or patient outcomes as described in its mission statement. (Formerly Criterion 3)

AAHKS CME activities (as well as the overall CME program) are designed in light of learning objectives that target changes in learner competence, performance, and/or patient outcomes, as evaluated via learner surveys/per self-reported learner outcomes.

Activity planning starts with identifying learner needs underlying professional practice gap(s). The goal of the CME activity is to close (or minimize) the professional practice gap(s). The needs underlying the practice gaps dictate activity objectives (development of specific content) and the best format to convey

the education to the target audience. At the conclusion of the activity, learners are surveyed and self-report changes in competence, performance and/or patient outcomes. Learners are surveyed on individual activity (as frequently as activities take place), as well as on the program level (annually).

Appropriate Formats

AAHKS chooses educational formats for activities/interventions that are appropriate for the setting, objectives, and desired results of the activity. (Formerly Criterion 5)

Educational formats include live, live internet, and internet enduring materials. AAHKS ensures the formats chosen for the activities are appropriate for the setting, the learning objectives, and the desired results.

AAHKS selects educational formats and design in such a way that they effectively facilitate achieving the learning objectives. While effectiveness is the foremost goal, AAHKS aims for practical formats that result in optimal member engagement with the educational content, i.e., learner preference, per learner feedback is considered.

For example, online live webinars facilitate learning for busy practitioners as those are shorter educational events. Similarly, they are convenient for members in remote/rural settings, allow the opportunity for international member participation without expensive travel, etc. AAHKS Spring Meeting, an intense, practice-based course, involving in depth case discussions dictates a small group, interactive live format for best results.

Evidence-based best practices in CME support data driven, multifaceted, sequential education as the most effective. Therefore, AAHKS aims for a blended approach when selecting learning formats and educational design in its overall program plan.

Competencies

AAHKS develops activities/educational interventions in the context of desirable physician attributes (competencies). (Formerly Criterion 6)

The expected results of the CME program, as well as individual CME activities are articulated within the context of desirable physician attributes, as described by the Institute of Medicine (IOM) Competencies, the Accreditation Council for Graduate Medical Education/American Board of Medical Specialties (ACGME/ABMS) Competencies, and Interprofessional Education Collaborative competencies.

The competencies targeted differ and depend on activity objectives and expected results, so they are unique to each educational offering. AAHKS determines which competencies are targeted by which educational activities based on activity goals, content, expected outcomes and the target audience.

For example, AAHKS Annual Meeting is a large educational event with multiple content areas, therefore, it hits most of the competencies in all three competency frameworks. However, AAHKS Orthopaedic Team Member Course is heavy on addressing competencies specific to inter-professional education, as it is a course dedicated to surgical team collaboration.

Analyzes Change

AAHKS analyzes changes in learners (competence, performance, or patient outcomes) achieved as a result of the overall program's activities/educational interventions. (Formerly Criterion 11)

The overarching goal of AAHKS CME activities is to improve the knowledge, competence and/or performance of the learners (and possibly to improve patient outcomes). Changes in these domains are assessed through:

- Activity evaluation surveys (learner self-reported outcomes) and their summary reports.
 - Evaluation surveys ask about intended improvements and a commitment to practice change as a result of attending the CME activity. A learner's attestation to a "commitment-to-change" is included in the summary reports, as are their comments specific to changes they intend to make.
- Real time learner polling and their summary reports
- Faculty observation and feedback during CME activities
- CME Debrief Meetings (AAHKS Leadership), where summary data is discussed.

Other Policies

CME Records

CME credit tracking is maintained by AAHKS in its CRM, Protech. AAHKS keeps auditable records in accordance with standard accounting practices for all CME activities. Physician attendance records are maintained for a period of 6 years following the conclusion of the activity.

CME activity files are guided by ACCME's Structured abstract.

Accreditation and Credit Designation Statements

The accreditation and credit designation statements appear on all CME activity materials except on initial, save-the-date activity announcements, which contain only general, preliminary information about the activity. The statements appear as follows:

Accreditation Statement:

The American Association of Hip and Knee Surgeons (AAHKS) is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians.

AMA Credit Designation Statement:

The American Association of Hip and Knee Surgeons (AAHKS) designates this [learning format: see below] for a maximum of [number of credits] *AMA PRA Category 1 Credit(s)*[™]. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

The learning format listed in the Credit Designation Statement must be one of the following AMA approved learning formats:

1. Live activity
2. Enduring material
3. Journal-based CME activity

4. Test-item writing activity
5. Manuscript review activity
6. PI CME activity
7. Internet point-of-care activity

Standards for Integrity and Independence in Accredited Continuing Education

Owners and Employees of Ineligible Companies

The owners and employees of ineligible companies are considered to have unresolvable financial relationships and must be excluded from participating as planners or faculty and must not be allowed to influence or control any aspect of the planning, delivery, or evaluation of accredited continuing education.

Owners and employees are individuals who have a legal duty to act in the company's best interests.

Definition of owners - individuals who have an ownership interest in a company, except for stockholders of publicly traded companies, or holders of shares through a pension or mutual fund.

Definition of employees - individuals hired to work for another person or business (the employer) for compensation and who are subject to the employer's direction as to the details of how to perform the job.

Ineligible companies are prohibited from engaging in joint providership with accredited providers. Joint providership enables accredited providers to work with nonaccredited eligible organizations to deliver accredited education.

Subsidiaries of an ineligible parent company cannot be accredited regardless of steps taken to firewall the subsidiaries. If an eligible parent company has an ineligible subsidiary, the owners and employees of the ineligible subsidiary must be excluded from accredited continuing education.

Standard 1: Ensure Content is Valid

AAHKS is responsible for ensuring that its education is fair and balanced and that any clinical content presented supports safe, effective patient care.

1. All recommendations for patient care in accredited continuing education must be based on current science, evidence, and clinical reasoning, while giving a fair and balanced view of diagnostic and therapeutic options.

All AAHKS CME activities are designed to provide updates on the scientific and clinical status of hip and knee surgery, based on the needs that underlie professional practice gaps and allow for an exchange between clinicians and other scientists actively practicing in the field of joint arthroplasty.

These educational interventions provide contemporary information and training to improve the proficiencies of the learners, and ultimately, help improve patient care and outcomes. The full range of current and emerging therapeutic, diagnostic, and surgical modalities are integrated into each

educational activity, covering all options currently available and giving a balanced view of the evidence that is accepted within the profession.

2. All scientific research referred to, reported, or used in accredited education in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection, analysis, and interpretation.

By accepting the invitation to engage in AAHKS CME activity, all presenters (and otherwise contributors to the CME content) commit to the following:

- present a scientifically sound and balanced educational content and avoid introducing any commercial bias
- disclose all financial relationships to learners verbally and in print
- promote quality or improvements in healthcare and not promote a specific proprietary business interest of an ineligible company(s)
- present content, including any presentation of therapeutic options, that is well balanced, evidence based and unbiased
- not accept any honoraria, additional payments, or reimbursements beyond that which has been agreed upon directly with AAHKS
- allow AAHKS to review presentations and/or content prior to the activity (including references)
- when providing recommendations involving clinical medicine, base them on evidence that is accepted within the profession of medicine and adequately justifies the indications and contraindications in the care of patients. All scientific research referred to, reported, or used in CME in support of justification of a patient care recommendation has to conform to the generally accepted standards of experimental design, data collection and analysis.
- when discussing any product use that is off label, to disclose that the use or indication in question is not currently approved by the FDA for labeling and advertising.

3. Although accredited continuing education is an appropriate place to discuss, debate, and explore new and evolving topics, these areas need to be clearly identified as such within the program and individual presentations. It is the responsibility of accredited providers to facilitate engagement with these topics without advocating for, or promoting, practices that are not, or not yet adequately based on current science, evidence, and clinical reasoning.

By accepting the invitation to engage in AAHKS CME activity, all presenters (and otherwise contributors to the CME Content) agree to identify new and evolving topics not supported by evidence as such, where and when appropriate.

AAHKS includes the following disclaimer in all activity program books/web pages:

- The content presented at <name of the CME activity> is made available by AAHKS for educational purposes only. This content is not intended to represent the only method or practice appropriate for the medical situations discussed; it is intended to present a balanced and scientifically sound view, approach, statement, or an opinion of the faculty, which may be helpful to others who face similar situations or afford a forum to discuss, debate, and explore new and evolving topics. The presentation of topics and any data about clinical practices should

not be interpreted as advocating for, or promoting, practices that are not, or not yet adequately based on current science, evidence, and clinical reasoning.

When discussing any product use that is off label, presenters (and otherwise contributors to the CME content) agree to disclose that the use or indication in question is not currently approved by the FDA for labeling and advertising.

AAHKS includes the following FDA disclaimer in all activity program books/web pages:

- Some pharmaceuticals and/or medical devices demonstrated at the <name of the CME activity> have not been cleared by the US Food and Drug Administration (FDA) or have been cleared by the FDA for specific purposes only. The FDA has stated that it is the responsibility of the physician to determine the FDA clearance status of each pharmaceutical and/or medical device he or she wishes to use in clinical practice. The AAHKS policy provides that “off label” status of the device or pharmaceutical is also specifically disclosed (i.e., that the FDA has not approved labeling the device for the described purpose). Any device or pharmaceutical is being used “off label” if the described use is not set forth on the product’s approved label.

4. Organizations cannot be accredited if they advocate for unscientific approaches to diagnosis or therapy, or if their education promotes recommendations, treatment, or manners of practicing healthcare that are determined to have risks or dangers that outweigh the benefits or are known to be ineffective in the treatment of patients.

AAHKS engages an independent reviewer(s) to review ALL content for every AAHKS CME activity to ensure that no promotion occurs, no commercial bias exists, and that the content is balanced and scientifically sound.

Further, independent reviewer(s) are present/engaged with all CME activities to ensure consistency with the review process. The reviewer(s) are instructed to stop the delivery of content and to notify the Chair of AAHKS Education and Communication Council, as well as AAHKS Staff, if/when bias or any deviations from scientifically sound and balanced content are identified.

Standard 2: Prevent Commercial Bias and Marketing in Accredited Continuing Education
Accredited continuing education must protect learners from commercial bias and marketing.

1. AAHKS ensures that all decisions related to the planning, faculty selection, delivery, and evaluation of accredited education are made without any influence or involvement from the owners and employees of an ineligible company.

For all AAHKS CME activities, the needs are identified through several independent mechanisms, including needs assessment surveys, meeting evaluation summaries, peer-reviewed literature, national and specialty clinical guidelines, ACGME/ABMS/AAOS, IOM Competencies, laws and regulations, expert panels, planning committee input, etc. Representatives of ineligible companies are not allowed to be involved in the needs assessment process.

Educational objectives flow from the needs underlying the professional practice gaps. The educational objectives follow Bloom’s Taxonomy and are written in terms of what the learners will be able to do at the conclusion of the educational activity. Representatives of ineligible companies are not allowed to be involved in the determination of the objectives for any of AAHKS CME activities.

The selection of content and faculty is determined by education planners, who pick experts that can cover the content areas identified in the needs assessment process. Faculty choice is based on experience and expertise in the topic, publications, and previous presentations, as well as their ability to communicate information clearly and concisely, based on learner evaluations and peer assessment. Representatives of ineligible companies are not allowed to be involved in the selection of the faculty and content for any of AAHKS CME activities. Further, only the faculty whose conflicts of interest are identified and mitigated prior to the educational activity are allowed to present the content to the learners.

AAHKS does not allow ineligible company employees to present at any CME activities, except on an exceptional basis and as noted in **section 2, under Standard 3**.

AAHKS Committee members/leadership, who are the planners, course Chairs, course co-Chairs and other contributors able to control CME content are appointed to their committee/leadership positions based on AAHKS governance mechanism/bylaws and never preferentially. Also, they are the leading joint arthroplasty experts in the US and abroad. Representatives of ineligible companies are not allowed to be involved in the selection of the planners for any of AAHKS CME activities. Further, only the members whose conflicts of interest are identified and mitigated prior to the start of the educational activity planning are allowed to participate as planners, course Chairs, Course Co-Chairs and otherwise contributors to the CME content.

The rationale for the selection of educational methods and formats is based on the learning objectives and the desired results, and it is driven by activity setting. It is independent of the influence of the ineligible companies. Representatives of ineligible companies are not allowed to be involved in the determination of the educational methods and formats for any of AAHKS activities.

All of the CME content undergoes a peer review process by an independent AAHKS reviewer(s) (a member with no ties to ineligible companies).

Evaluations of the CME activities are conducted by AAHKS using web-based audience polling and evaluation surveys. Evaluation surveys include questions regarding the presence of commercial bias in the CME activities. All results are tabulated and analyzed in the aggregate by AAHKS staff and shared with education planners/core AAHKS leadership group for debriefing. This data is never shared with ineligible companies. Representatives of ineligible companies are not allowed to participate in the debriefing sessions.

None of the ineligible companies have ever taken the role of a non-accredited partner in a joint provider relationship with AAHKS and is not allowed to engage in this manner.

2. Accredited education must be free of marketing or sales of products or services. Faculty must not actively promote or sell products or services that serve their professional or financial interests during accredited education.

All sales and marketing activities by ineligible companies are managed by the Department of Corporate Relations and AAHKS Industry Relations Committee. Sales and marketing activities take place in a designated space, which is separate from the space of AAHKS CME activities, be it in person or online.

Sales and marketing activity is directed by a contract, as well as guidance for the ineligible companies engaging in sales and marketing activities with AAHKS (i.e., exhibitor prospectus), which references ACCME Standards for Integrity and Independence in Accredited Continuing Education.

Policy and procedures stated under **Standards 1, 2 and 3** ensure that faculty does not promote or sell products or services that serve their professional or financial interests during accredited education.

3. AAHKS does not share the names or contact information of learners with any ineligible company or its agents without the explicit consent of the individual learner.

AAHKS does not share names or contact information of learners with any ineligible companies or its agents unless a permission is granted by individual learners. Learners have an option to opt in and out of third-party solicitation online, once registering for AAHKS education or renewing their membership.

Standard 3: Identify, Mitigate, and Disclose Relevant Financial Relationships

Many healthcare professionals have financial relationships with ineligible companies. These relationships must not be allowed to influence accredited continuing education. AAHKS is responsible for identifying relevant financial relationships between individuals in control of educational content and ineligible companies and managing these to ensure they do not introduce commercial bias into the education. Financial relationships of any dollar amount are defined as relevant if the educational content is related to the business lines or products of the ineligible company. AAHKS takes the following steps when developing accredited continuing education.

1. Collect information: Collect information from all planners, faculty, and others in control of educational content about all their financial relationships with ineligible companies within the prior 24 months. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies. Individuals must disclose regardless of their view of the relevance of the relationship to the education.

Disclosure information must include:

- a. The name of the ineligible company with which the person has a financial relationship.
- b. The nature of the financial relationship. 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.

AAHKS collects the stated disclosure information via AAOS Disclosure Website. The website serves as the database for presenter and otherwise contributor to CME content disclosure information. AAHKS instructs their presenters and contributors to update the disclosure information regularly and as needed (when new relationships occur). AAHKS is able to retrieve full disclosure information reports from the website for all of its planners and contributors, as needed.

2. Exclude owners or employees of ineligible companies: Review the information about financial relationships to identify individuals who are owners or employees of ineligible companies. These individuals must be excluded from controlling content or participating as planners or faculty in accredited education.

There are three exceptions to this exclusion—employees of ineligible companies can participate as planners or faculty in these specific situations:

- a. When the content of the activity is not related to the business lines or products of their employer/company.**
- b. When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations.**
- c. When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.**

AAHKS does not allow owners or employees of ineligible companies to participate as planners, presenters, or otherwise contributors to CME content. AAHKS *may* allow owners or employees of ineligible companies to participate as presenters/faculty of accredited education on an exceptional basis, per three exceptions noted above.

3. Identify relevant financial relationships: Review the information about financial relationships to determine which relationships are relevant. Financial relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.

AAHKS engages independent reviewer(s) to assist with identification of relevant financial relationships of all planners, faculty and otherwise contributors to the content. Upon reviewing disclosure information and gaining a thorough understanding of the financial relationships, the reviewer(s) weigh the relationship within the context of the individual's involvement in the CME activity. If there is a link between the financial relationships and the individual's role in the CME activity/with the educational content, reviewer(s) identify such relationships as relevant.

4. Mitigate relevant financial relationships: Take steps to prevent all those with relevant financial relationships from inserting commercial bias into content.

- a. Mitigate relationships prior to the individuals assuming their roles. Take steps appropriate to the role of the individual. For example, steps for planners will likely be different than for faculty and would occur before planning begins.**
- b. Document the steps taken to mitigate relevant financial relationships.**

Mitigation process and documentation:

Step 1: Prior to the start of the CME activity planning (for planners and contributors) and prior to the CME activity start (for presenters/faculty), AAHKS shares its CME Policy and related expectations for fair, balanced and scientifically sound content with the respective parties. The acceptance of the invitation to participate in the activity is conditional on complying with the policy.

Step 2: Independent reviewer(s) review draft agenda/schedule of the activity, as well as faculty presentations/activity content. When/if bias is discovered in the activity materials or the instructional content, planners, faculty and/or otherwise contributors are alerted. The following steps may be taken to prevent bias:

- changing individual's control over content
- changing individual's role within the CME activity
- changing the content of the individual's assignment or contribution
- eliminating the individual from participation in the activity; and
- other

Step 3: AAHKS staff proceeds to document the mitigation mechanism, including:

- the name of the individual
- individual's role(s) in the activity
- name of Ineligible company(s)
- nature of relationship(s)
- mechanism(s) implemented to mitigate relevant financial relationships appropriate to the role(s) in the activity

Step 4: Independent reviewer(s) are present at all live CME activities and monitor any enduring internet activities to ensure consistency with the review process. The reviewer(s) are instructed to stop the delivery of content and report to the Chair of AAHKS Education and Communication Council, as well as AAHKS Staff any bias or deviations from scientifically sound and balanced content

5. Disclose all relevant financial relationships to learners: Disclosure to learners must include each of the following:

- a. The names of the individuals with relevant financial relationships.**
- b. The names of the ineligible companies with which they have relationships.**
- c. The nature of the relationships.**
- d. A statement that all relevant financial relationships have been mitigated.**

Disclosure to learners must not include ineligible companies' corporate or product logos, trade names, or product group messages.

Disclose absence of relevant financial relationships. Inform learners about planners, faculty, and others in control of content (either individually or as a group) with no relevant financial relationships with ineligible companies.

Learners must receive disclosure information in a format that can be verified at the time of accreditation, before engaging with the accredited education.

AAHKS makes a list of disclosures available to learners on AAHKS website and mobile app. The disclosure list includes a statement that relevant financial relationships have been mitigated.

AAHKS asks every presenter/faculty to include a slide at the beginning of their presentation listing their disclosure information as described above.

For AAHKS Annual Meeting specifically, AAHKS asks every presenter/faculty to include a slide at the beginning of their presentation listing their and their research co-author disclosures as described above. Session moderators are asked to verbally identify relevant financial relationships of the presenters/faculty and/or their co-authors per independent reviewer report.

Exceptions: AAHKS does not need to identify, mitigate, or disclose relevant financial relationships for any of the following activities:

- 1. Accredited education that is non-clinical, such as leadership or communication skills training.**
- 2. Accredited education where the learner group is in control of content, such as a spontaneous case conversation among peers.**
- 3. Accredited self-directed education where the learner controls their educational goals and reports on changes that resulted, such as learning from teaching, remediation, or a personal development plan. When AAHKS serves as a source of information for the self-directed learner, they should direct learners only to resources and methods for learning that are not controlled by ineligible companies.**

Standard 4: Manage Commercial Support Appropriately

When accepting commercial support (defined as financial or in-kind support from ineligible companies), AAHKS is responsible for ensuring that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. The support does not establish a financial relationship between the ineligible company and planners, faculty, and others in control of content of the education.

- 1. Decision-making and disbursement: AAHKS must make all decisions regarding the receipt and disbursement of the commercial support.**
 - a. Ineligible companies must not pay directly for any of the expenses related to the education or the learners.**
 - b. AAHKS may use commercial support to fund honoraria or travel expenses of planners, faculty, and others in control of content for those roles only.**
 - c. AAHKS must not use commercial support to pay for travel, lodging, honoraria, or personal expenses for individual learners or groups of learners in accredited education.**
 - d. AAHKS may use commercial support to defray or eliminate the cost of the education for all learners.**

AAHKS accepts commercial support from ineligible companies as an ACH/wire transfer and documents the support as educational grant in accounting records.

As a standard practice, AAHKS does not pay honoraria to its planners, faculty, and others in control of the CME content for those roles. However, AAHKS may occasionally pay the honoraria for an invited guest speaker, i.e., keynote.

AAHKS may reimburse planner, faculty, and otherwise contributor travel expenses. The process follows AAHKS policy for travel and expense reimbursement. Specifically, those being reimbursed fill out AAHKS Expense Reimbursement Form and submit it to AAHKS along with original expense receipts. Rules on what is covered and associated caps for expenses apply. After the review of the documentation, AAHKS provides a check that covers the said expenses.

AAHKS charges a registration fee for all its live CME activities. AAHKS never pays for travel, lodging, honoraria, or personal expenses of individual learners or groups of learners in accredited education.

AAHKS offers some of its online CME (i.e., webinars) free of charge/as a member benefit. However, those activities do not receive commercial support.

2. Agreement: The terms, conditions, and purposes of the commercial support must be documented in an agreement between the ineligible company and AAHKS. The agreement must be executed prior to the start of the accredited education. An accredited provider can sign onto an existing agreement between an accredited provider and a commercial supporter by indicating its acceptance of the terms, conditions, and amount of commercial support it will receive.

AAHKS signs an agreement with every ineligible company providing commercial support for accredited education prior to the start of the education. The agreement includes the following terms:

- Statement of Purpose: program is for scientific and educational purposes only and will not promote Company's products, directly or indirectly.
- Control of Content & Selection of Presenters & Moderators: AAHKS is responsible for control of content and selection of presenters and moderators. The Company agrees not to direct the content of the program. There will be no "scripting," emphasis, or direction of content by the Company or its agents.
- Disclosure of Financial Relationships: AAHKS will ensure meaningful disclosure to the audience, at the time of the program, of (a) Company funding and (b) any significant relationship between AAHKS and the company or between individual speakers or moderators and the Company.
- Objectivity & Balance: AAHKS will make every effort to ensure that data regarding the Company products (or competing products) are objectively selected and presented, with favorable and unfavorable information and balanced discussion of prevailing information on the products(s) and/or alternative treatments.
- Limitations on Data: AAHKS will ensure, to the extent possible, meaningful disclosure of limitations on data, e.g., ongoing research, interim analyses, preliminary data, or unsupported opinion.
- Discussion of Unapproved Uses: AAHKS will require that presenters disclose when a product is not approved in the United States for the use under discussion.
- Opportunities for Debate: AAHKS will ensure meaningful opportunities for questioning or scientific debate.

3. Accountability: AAHKS keeps a record of the amount or kind of commercial support received and how it was used, and is able to produce that accounting, upon request, by the accrediting body or by the ineligible company that provided the commercial support.

Commercial support records are available upon request.

4. Disclosure to learners: AAHKS discloses to the learners the name(s) of the ineligible company(ies) that gave the commercial support (and the nature of the support if it was in kind), prior to the learners engaging in the education. Disclosure does not include the ineligible companies' corporate or product logos, trade names, or product group messages.

The sources of commercial support for AAHKS CME activities receiving support are disclosed to learners in the final printed CME activity program, on the website, and mobile app. In accordance with the ACCME requirements, no logos are used in the acknowledgements.

Standard 5: Manage Ancillary Activities Offered in Conjunction with Accredited Continuing Education.

AAHKS is responsible for ensuring that education is separate from marketing by ineligible companies—including advertising, sales, exhibits, and promotion—and from nonaccredited education offered in conjunction with accredited continuing education.

1. Arrangements to allow ineligible companies to market or exhibit in association with accredited education must not:

- a. Influence any decisions related to the planning, delivery, and evaluation of the education.**
- b. Interfere with the presentation of the education.**
- c. Be a condition of the provision of financial or in-kind support from ineligible companies for the education.**

Organizationally, there is a separation between corporate relations and education both at the staff level and the Committee level at AAHKS. All promotional activities by ineligible companies, including the exhibits, are managed by the Director of Marketing and Corporate Relations and AAHKS Industry Relations Committee. Education is managed by the Senior Director of Education and Science and Education and Communication Council and Committees under its purview. Such separation serves as a firewall and ensures that Ineligible companies have no connection to the education branch of AAHKS and that ineligible companies have no opportunity to influence CME planning, delivery, and evaluation. Specific steps to ensure content validity and prevent bias in CME activities are stated under **Standards 1, 2, 3 and 4.**

Promotional activities of ineligible companies, typically exhibits, take place at a dedicated space, which is physically separate from the CME space. AAHKS exhibitor guide (i.e., exhibitor prospectus) specifies the exhibit space, schedule, as well as AAHKS policies directing exhibitor conduct.

For example, subject to compliance with AAHKS, AdvaMed, ACCME and AMA guidelines, distribution of promotional gummed stickers or labels are prohibited. Under no circumstances can any promotional material be allowed in lobby areas. Prize contests, drawings, raffles, or lotteries of any description, held at any time or places within the auspices of the meeting are expressly prohibited. Non-AAHKS Meeting activities may only be promoted within the confines of the exhibitor space or in public areas of the hotel. AAHKS may forbid or request removal of any “giveaway” at its discretion.

Exhibitor representatives are expected to present themselves professionally at all times and to respect the sales activities of their competitors on the show floor. Any violations or improper behavior should be reported immediately to AAHKS.

Exhibitor guide includes ACCME Standards for Integrity and Independence in Accredited Continuing Education as a guidance for the participating ineligible companies on the separation of promotion and CME. Further, ineligible companies sign a contract and pay a fee for the exhibit space that allows them to engage in sales and promotional activities in their designated exhibit booth only.

If an ineligible company is providing educational grant (or in-kind support), such activity is directed by a separate contract, which includes conditions ensuring independence and separation between the accredited education and the ineligible company.

2. AAHKS ensures that learners can easily distinguish between accredited education and other activities.

- a. Live continuing education activities: Marketing, exhibits, and nonaccredited education developed**

by or with influence from an ineligible company or with planners or faculty with unmitigated financial relationships must not occur in the educational space within 30 minutes before or after an accredited education activity. Activities that are part of the event but are not accredited for continuing education must be clearly labeled and communicated as such.

b. Print, online, or digital continuing education activities: Learners are not presented with marketing while engaged in the accredited education activity. Learners must be able to engage with the accredited education without having to click through, watch, listen to, or be presented with product promotion or product-specific advertisement.

c. Educational materials that are part of accredited education (such as slides, abstracts, handouts, evaluation mechanisms, or disclosure information) do not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.

d. Information distributed about accredited education that does not include educational content, such as schedules and logistical information, may include marketing by or for an ineligible company.

Promotional activities of ineligible companies take place at a dedicated space, which is physically separate from the CME space be it a live in person CME activity, or live or remote online CME activity. The same holds true for not accredited education. Such activities are clearly identified on event schedule and are communicated to the learners.

AAHKS owns its LMS, LEARN. The LMS does not allow third party advertising, and learners are not presenter with marketing of any sort while engaged in online/digital accredited education.

AAHKS exclusively manages the planning, implementation, and evaluation of its CME activities and without ineligible company interference. Therefore, accredited education materials do not include any marketing produced by or for such entities (as well as no logos, trade names, or product messages).

AAHKS may occasionally include marketing by or for an ineligible company along with the “save the date” or “preliminary schedule” notice for its accredited education.

3. Ineligible companies may not provide access to, or distribute, accredited education to learners.

All live CME activities are put on, held, and clearly identified as AAHKS events. AAHKS owns an LMS and provides access to all accredited online/digital education to the learners without product promotion, advertisement or otherwise marketing for or by ineligible companies, as such are prohibited.