

From ADA CERP 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, etc.) 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 nonpromotional are not subject to FDA regulation. In this context, the American Dental Association Continuing Education Recognition Program (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. The American Dental Education Association (ADEA) 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 independently of commercial interest.
2. ADEA must ensure that continuing dental education activities promote improvements in oral health care 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. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided during CDE activities.
 - a. Prior to, during or after the educational session, advertisements and promotional materials cannot be displayed or distributed in the educational space. ADEA does not allow representatives of commercial interests to engage in sales or promotional activities while in the space or place of the CDE activity.
4. ADEA 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.
5. 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 who 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.