



Council on Optometric Practitioner Education

Information for Administrator Approval and Instructions for COPE Event Submission

Revised June 2010

New: *Standards for Commercial Support
of Continuing Education*

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*A Service of the
Association of Regulatory
Boards of Optometry*



Association of Regulatory Boards of Optometry, Inc.

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June 2010

Dear Continuing Education Administrator:

The Council on Optometric Practitioner Education (COPE) was developed by the Association of Regulatory Boards of Optometry (ARBO) to simplify the approval process of continuing education (CE) courses for optometric licensing boards. While COPE's main purpose is to assist our member boards in the review and approval process for optometric CE necessary for license renewal, this system benefits CE Administrators/Providers and Instructors as well.

COPE can help you reduce the amount of work and effort required to obtain approval for your CE programs from individual regulatory boards. Standardized forms and processes shared by ARBO Member Boards eliminates redundancy. Using the COPE symbol for accredited courses in your promotional materials will tell optometrists seeking CE that the courses presented at your meeting are accepted for license renewal in all COPE jurisdictions. As a COPE-Approved Administrator/Provider, you can also search our entire database of qualified courses to help you when planning your next CE program.

Obtaining COPE accreditation for your program is easy. First, you must become a COPE-Approved Administrator/Provider. If you haven't already done this, contact ARBO to obtain an application. Then, you can go to the ARBO website (www.arbo.org) and submit your Event for COPE approval. Simply click on COPE and then click on Administrators Submit Events and follow the step by step instructions. Courses appearing on your program that have already been submitted to COPE are designated as "COPE Qualified". When your Event is approved, these courses become COPE Accredited and will be accepted for CE credit by optometry licensing boards participating in COPE. If there are courses you want to offer in your program that are not yet COPE qualified, please contact the course instructors and ask them to submit their courses for COPE qualification.

All the information you need to submit your Event for COPE approval is in this handbook. Please read the entire handbook before applying for COPE accreditation as this will expedite the qualification process. We recommend that you submit your event at least two weeks in advance of your program.

We would like to thank you for your participation in this valuable program. Your involvement with COPE ensures high-quality continuing education for optometrists, and also helps ARBO in our mission to represent and assist member licensing boards in regulating the practice of optometry for the public welfare. Should you need further information about COPE, or if you need help entering your event, please call ARBO at (704) 970-2710, or email to arbo@arbo.org. For more information on submitting courses for COPE qualification, contact ARBO or see the *Criteria for COPE Qualification of Continuing Education* handbook.

Sincerely,

The Council on Optometric Practitioner Education





WHAT IS COPE?

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Optometric continuing education (CE) is the primary method used by optometric regulatory boards to promote the continuing competence of licensed optometrists. There are a variety of formats by which each optometry licensing board approves CE courses, disseminates course information, records course attendance, and retrieves practitioner data on course completion. One licensing board duplicates much of the administrative work done by another licensing board, and many boards approve the same CE courses every year.

The **Council on Optometric Practitioner Education® (COPE®)**, a national clearinghouse for all CE courses of a national, regional, statewide or local scope, was created by the Association of Regulatory Boards of Optometry (ARBO) to remove these duplicative efforts by optometric licensing boards, instructors, and program administrators/providers.

By applying to ARBO and agreeing to abide by COPE's rules and regulations, your organization can become a **COPE-Approved Administrator/Provider**. In addition to reducing the amount of time and effort you spend securing optometry licensing board approval for your program(s), this designation will enhance the effectiveness of your marketing efforts to practitioners who are seeking COPE-Accredited CE.

COPE is a member benefit of ARBO which currently represents 50 US optometry boards, 4 US territories/jurisdictions, and 8 Canadian optometry boards. COPE's mission is to:

Assist member boards in the accreditation and monitoring of optometric continuing education to enhance optometric competence for the protection of the public.

To create this national clearinghouse, participating optometric licensing boards have agreed upon standards for administration of continuing education courses, and a standard course submission, qualification and accreditation process.

COPE STANDARDS FOR COMMERCIAL SUPPORT OVERVIEW

As of January 1, 2010, COPE has implemented new Standards for Commercial Support (SCS) of continuing education. Instructors and Administrators/Providers of COPE-Accredited CE must agree to abide by the following standards regarding commercial support. **Note:** See the full COPE Standards for Commercial Support on pages 16-18 .

1. COPE-Accredited CE must be identified, developed and presented free from the control of a commercial interest.
2. Every person in a position to impact the content of COPE-Accredited CE must disclose all relevant financial relationships to the COPE-Approved Administrator/Provider and to the Learners.
3. In order for a CE event to be COPE Approved, all commercial support must be in the form of an educational grant or letter of agreement between the COPE-Approved Administrator/Provider and the Corporate Supporter. Electronic signatures are acceptable.
4. There must be a clear separation of any type of product, service, and instrument or device promotion with COPE-Accredited Courses. These activities, such as commercial exhibits and advertisements must be physically separated from and not interfere with COPE-Accredited Courses.
5. All COPE-Accredited Courses cannot promote specific proprietary business interests and must give balanced coverage to treatment options.
6. To maintain transparency, financial relationships with commercial interests of any persons in a position to impact or control the educational content must be disclosed to the learners. This includes instructors and planning committee members.

OBTAINING COPE APPROVAL FOR YOUR EVENT

IMPORTANT: All courses which will be held at your event must be COPE qualified prior to submitting the event. It takes approximately 4-6 weeks for a course to go through the COPE qualification process. For more information on submitting individual courses for COPE qualification, contact ARBO for a copy of the Criteria for COPE Qualification of Continuing Education handbook or go to www.arbo.org and click on COPE.

Obtaining COPE approval for your event is easy. Your first step is to apply to become an approved COPE Administrator/Provider. Contact ARBO at 704-970-2710 or submit your application online at www.arbo.org. Click on COPE and then click on Administrator Qualification to access the application. Your organization may not be a commercial interest and must agree to abide by COPE's rules and regulations in order to become an approved COPE Administrator/Provider.

Once you have been approved by COPE, you can submit the event through the ARBO website. You will need to submit each event (e.g. meeting, conference, online) your organization administers only once regardless of how many courses will be held at the event. For example, if your organization administers a single, three-day annual meeting that presents CE courses for attendees and is called "XXX Annual Meeting 2010", you are required to submit only one COPE Event for the entire meeting (not one for each course presented in the meeting). It is recommended that you submit your COPE Event to the ARBO website at least two weeks prior to your scheduled event.

Once ARBO has received your COPE Event submission, you will be sent an email confirming your submission and giving you the Event ID number. We will then verify your course(s) against our database of COPE-Qualified Courses and check that all the necessary materials have been submitted. Once your event is approved, the courses that were COPE qualified are now considered "COPE-Accredited Courses" and can be promoted as such. You will receive an email from ARBO notifying you when your event has been approved. Your event and list of courses are then posted on the ARBO website for access by all participating optometric licensing boards.

An electronic copy of the COPE logo is available, without charge, to COPE-Approved Administrators/Providers to use in promotional materials to help identify the status of CE approval to your meeting attendees. Contact ARBO for an electronic copy of the COPE logo.

Remember that each COPE-Qualified Course has a unique COPE Course ID number. Your COPE-Approved Event will also be assigned a COPE Event ID number. You must include the COPE Course ID and Event ID numbers in all correspondence to ARBO, optometry licensing boards, and on all CE attendance certificates.

Please Note:

- When submitting your COPE Event on the ARBO website, always check that the contact information we have for you is accurate. We must have your correct email address in order to respond to you about your event.
- For your event to be approved, you will need to attach:
 - COPE-Qualified Course ID numbers for all the courses being held at your event.
 - A copy of your promotional literature or registration materials for the meeting.
 - A copy of the attendance certificate which will be distributed to the meeting attendees.
- Remit the necessary event processing fee identified on the website. Events will not be approved until payment is received.
- Submit your event to ARBO at least two weeks in advance of the meeting date.
- Submit your attendance data to ARBO within 30 days following your event (see page 9).

COPE-Accredited CE Credit

It is important to remember that when you advertise a COPE-Accredited course, you are informing course attendees and optometric licensing boards that you are a *COPE-Approved Administrator/Provider* of CE Events, presenting *COPE-Qualified Courses*. Only *COPE-Approved Administrators/Providers* may advertise a course as COPE Accredited.

Remember:

$$\begin{array}{c} \text{COPE-Qualified Course(s)} \\ + \\ \text{COPE-Approved Event} \\ = \\ \text{COPE-Accredited CE} \end{array}$$

CRITERIA FOR EVENT APPROVAL

In order to hold COPE-Accredited events, you must first apply to ARBO to become a COPE-Approved Administrator/Provider. Call ARBO or visit www.arbo.org for a COPE Administrator/Provider Approval Application. As a COPE-Approved Administrator/Provider, you agree to comply with the following rules and regulations. If you have any questions concerning these criteria, please contact ARBO at 704-970-2710.

A. Administrator/Provider Requirements:

1. A COPE Approved Administrator/Provider may submit the course on behalf of the instructor(s), but the instructor(s) must acknowledge the submission and adherence to COPE requirements by attaching a dated and signed statement from the instructor(s) when submitting the course.
2. Under no circumstances can an Instructor serve as both the Administrator/Provider and Instructor for a COPE Accredited CE Course or Event at the same time.
3. COPE Approved Administrators/Providers cannot be directly employed by or represent a commercial interest.
4. For COPE Accredited CE, financial support from commercial interests must be in the form of an educational grant or letter of agreement. This requires a signed agreement (electronic signatures acceptable) with each supporter, agreeing to abide by the principles inherent in the COPE Standards for Commercial Support and the purpose of the educational grants must be acknowledged in the agreement.
 - a. The only financial or in-kind support provided by commercial interests can be given within the educational grant; supporters cannot give any financial incentives or reimbursement to instructors and anyone else in a position to impact the content of COPE Accredited CE, including persons involved in the educational planning activities.
 - b. Only COPE Approved Administrators/Providers may enter into a contract with the supporters.
 - c. COPE Approved Administrators/Providers must make all decisions regarding the disbursement and use of commercial support.
 - d. COPE Approved Administrators/Providers may not use a commercial interest as the agent providing COPE Accredited CE to learners; this includes the distribution of correspondence course materials, or for arranging for electronic access to courses, such as Webinars and Webcasts.
 - e. All in-kind support must be disclosed to the learners.
5. A COPE Approved Administrator/Provider must take all needed steps to ensure Instructors present fair and balanced presentations, and poll the learners in the course evaluations to determine same.
6. COPE Approved Administrators/Providers will maintain overall control over every aspect of the event, including promotional activities, exhibits and materials.
7. COPE Accredited CE must be open to all optometrists. COPE Approved Administrators must ensure this by the following:
 - a. No efforts shall be made to exclude any learners.
 - b. Commercial interests cannot invite or select learners, or generate invitation lists.
 - c. Public notice of COPE Approved Events is required.
 - d. If attendance is limited by space requirements, this must be included in all invitations and public notices, with a first come, first served policy.
 - e. Non-members or affiliated parties of a COPE Approved Administrator/Provider must be able to attend the COPE Accredited CE event. Administrators/Providers may adjust the registration fees in a reasonable manner to accommodate them.
8. COPE Approved Administrators/Providers will have full control over the topics and speaker selection, scientific content, audience selection and outreach, marketing and promotion, and course evaluation.
9. COPE Approved Administrators/Providers will assure all persons with a position to identify speakers and impact content of COPE Accredited CE has disclosed relevant financial relationships with commercial interest.
10. COPE Approved Administrators/Providers must take all needed steps to ensure that in COPE Accredited CE:
 - a. Content and delivery is free of commercial bias;
 - b. acknowledgements of commercial support may state the name, mission, and areas of clinical involvement of the company or institution and may include corporate logos and slogans only if they are not promotional in nature;
 - c. instructors disclose financial relationships with commercial interest on the first slide in their presentations;
 - d. instructors disclose to the learners prior to presentation of off-label or experimental information;
 - e. educational materials such as slides, abstracts and outlines will not include any advertising or product group message; and
 - f. all financial reimbursement and payments to instructors are directly paid only by the COPE Approved Administrator/Provider and follow the written policies and procedures governing honoraria

CRITERIA FOR EVENT APPROVAL...continued

11. COPE Approved Administrators/Providers must maintain control over all promotional activities prior to, during and after events. Specific requirements regarding promotional activities include:
 - a. Product promotion, product specific advertisements of any type is prohibited in the educational space, on the screen or on the audio/video feeds or during COPE Accredited CE.
 - i. Recognizing that some smaller meetings may have an exhibition area outside the meeting room or rooms when there are no other options available, attendees should never be placed in a position where they are forced to stop and interact with exhibitors if they choose not to do so.
 - ii. For print and online distributed CE, promotional advertising cannot be interspersed within the CE educational materials.
 - b. Commercial interest representatives cannot engage in sales or promotional activities while in the same space or place of the COPE Accredited CE. Commercial interest representatives may be present during COPE Accredited CE, but must refrain from addressing the learners during the course delivery.
 - c. Commercial exhibits or advertisements cannot influence the planning or delivery of COPE Accredited CE.
 - d. Within educational content, advertising and promotional materials is prohibited. Acknowledgement of educational grants that are company and not product specific may be included within content not directly related to education of the learner or educational materials, including schedules, event descriptions and activities.
 - e. Commercial exhibits and advertisements are promotional activities and not CE. Monies paid by commercial interests to providers for this promotional opportunity are not considered to be 'commercial support' of CE.
- B. Requirements Concerning Courses:**
1. COPE Accredited CE must be open to all optometrists. COPE Approved Administrators must ensure this by the following:
 - No efforts shall be made to exclude any learners.
 - Commercial interests cannot invite or select learners, or generate invitation lists.
 - Public notice of COPE Approved Events is required.
 - If attendance is limited by space requirements, this must be included in all invitations and public notices, with a first come, first served policy.
 - Non-members or affiliated parties of a COPE Approved Administrator/Provider must be able to attend the COPE Accredited CE event. Administrators/Providers may adjust the registration fees in a reasonable manner to accommodate them.
 2. Courses must be COPE Qualified prior to being submitted for your event. **Note:** Course qualification takes 4-6 weeks. You must make sure the courses being held at your meeting are qualified well in advance of the event.
 3. A COPE-Approved Administrator/Provider may submit a course on behalf of the instructor, but the instructor must acknowledge the submission and adherence to COPE requirements by attaching a dated and signed statement from the instructor when submitting the course to COPE. For instructions on submitting a course for COPE qualification contact ARBO for a copy of the Criteria for COPE Qualification of Continuing Education handbook.
- C. Registration:**
1. Fees must be published clearly in promotional material. Any difference in member and non-member fees must be reasonable.
 2. On your registration materials, indicate which courses are COPE Accredited and which are not.
 3. In order to aid your submission of attendance data, you are encouraged to ask each attendee to provide their *OE TRACKER* number when registering. On rare occasion, an attendee may not wish to provide their *OE TRACKER* number. They may opt out by indicating their preference on your registration form.
- D. Instructional hours:**
1. The minimum credit for any COPE-Accredited Course is one hour.
 2. Additional credits must be in half-hour increments.
 3. One hour of continuing education credit equals 50 minutes of instructional time.
 4. For functions that involve food, sufficient time must be scheduled for eating prior to starting the CE. The meal cannot take precedence over the educational event.
- E. Facilities:**
1. The physical environment used must be conducive to learning.
 2. The instructional area must be appropriate and adequate to the content and method of delivery of the course and must be appropriately equipped with any audio-visual or clinical equipment needed to teach the course.
 3. The instructional area must accommodate the size of the audience comfortably.
 4. The venue must comply with ADA standards.

CRITERIA FOR EVENT APPROVAL...continued

F. Monitoring Attendance:

1. Monitoring must be an active policing process, conducted with integrity and impartiality.
2. Administrators/Providers must monitor attendance at all courses and ensure that CE credit is provided only to those individuals actually present during at least 50 minutes of each hour. At a minimum, this includes monitoring attendance throughout the day for all programs exceeding ½ day by recording attendance at the beginning of a course and verifying completion at the conclusion of the course.
3. No partial credit is permitted under any circumstances.
4. CE credit forms/certificates should not be validated until the conclusion of the course.
5. For larger events, barcode scanners may be borrowed from ARBO (subject to availability). For more information, or to request scanners for your event, email arbo@arbo.org.

G. Documenting Attendance:

1. Each participant must receive documentation of attendance, which will allow each course attended to be identified.

NOTE: All documentation, such as proof of attendance certificates, provided to the meeting attendees **MUST** include both the COPE Course ID # and the COPE Event ID #. This is necessary as licensing boards require the numbers when the course documentation is submitted to authenticate the course with COPE records; only then will states award CE credit for license renewal.

2. Documentation must be made available to participants in a timely fashion.
3. All certificates and/or other means of documenting CE credit must allow for the following information:
 - a. Name and address of the participant.
 - b. State(s) of licensure and license number.
 - c. **COPE Event ID number** and each **COPE Course ID number** [**MANDATORY!**]
 - d. Location and date(s) of the course(s).
 - e. Name of the instructor(s).
 - f. Name of the administrator.
 - g. Number of hours of CE credit awarded.
 - h. Signature of administrator or a duly authorized representative, or symbol verifying attendance.
4. Attendance records must be retained for 5 years. Submission of attendance data to COPE alleviates

this administrative requirement. COPE (through the *OE TRACKER* system) will electronically maintain your records indefinitely.

5. Following your event, submit the attendance information to COPE within 30 days. See page 9 for more information.

H. Course Evaluations:

1. Evaluations of course effectiveness must be carried out.
2. A summary of the evaluation of each course must be kept on file for one year.
3. Each instructor must receive a copy of the evaluation summary for his/her course.
4. The evaluations must be used in planning future programs.

I. Promotional Materials:

Administrators/Providers may use only the following specific terms in promotional marketing materials:

- If a program has been filed with COPE, and all submitted courses are qualified: *COPE Accreditation granted for some or all parts of this program.*
- If a program has been submitted for review to COPE, but review is not yet complete, or the Administrator intends to submit the program for review: *COPE Accreditation Pending.*
- No other descriptions or terms are permitted as they relate to the COPE logo or the acronym “COPE”. Please note that both the logo and the acronym, “COPE”, are registered service marks and are protected under the Trademark Act from improper or illegal use.

J. Acceptance of COPE On-Site Reviewers:

Administrators/Providers agree to accept COPE-designated on-site reviewers at COPE-Accredited Events and understand that such reviewers will appear randomly, without advance notice. The reviewer may present an official letter from COPE verifying his/her status as a COPE on-site Reviewer, and must be permitted to attend without being required to pay a registration fee. However, COPE reviewers who seek CE credit are expected to register and pay for courses in the same manner as any other participant.

K. Compliance with COPE Rules:

Administrators/Providers agree to comply with all COPE rules and will respond in a timely manner to any investigative inquiries related to their event(s).

INSTRUCTIONS FOR SUBMITTING AN EVENT

IMPORTANT: Courses are not “COPE Accredited” until an EVENT has been submitted, along with the required documentation, to ARBO by a COPE-Approved Administrator/Provider. Only COPE-Approved Administrators/Providers can submit Events for COPE approval. To obtain an application to become a COPE-Approved Administrator/Provider, contact ARBO at 704-970-2710 or visit www.arbo.org.

1. Go to the ARBO website (www.arbo.org) and click on Administrator Login. Enter your username and password. If you do not have a username and password, you must first fill out the COPE Administrator application and submit it to ARBO. To submit your application online click on COPE and then on Administrator Qualification.
2. Verify that all the courses you want to present at your meeting have current COPE qualification before submitting your event. Click on Lookup COPE Qualified Courses and enter the Course ID#, Instructor Name or Course Title. If the course is not qualified, or the qualification has expired, contact the instructor and ask them to submit, or resubmit, the course for COPE approval.
3. Before submitting your event, please click on View My Profile and verify that your contact information is correct. It is very important that your email address is correct as all correspondence from ARBO concerning your event will be done by email. If your contact information is not correct, please call the ARBO office to have it updated.
4. Click on Submit an Event and enter the event information.
 - a. Enter the event title, format, type and date(s).
 - b. Enter the event location (venue, address, website, etc.).
 - c. Enter any event publications (if applicable).
 - d. Check whether there are going to be commercial exhibits at your event.
 - e. Enter the event description.
 - f. Check whether this is an ASCO Event.
 - g. Click on Save and Go to the Next Step.
5. Enter the COPE Course ID numbers for the courses that will be held at your Event. You can enter up to five courses at a time and then click on Add Courses. You can search for COPE Qualified Courses by clicking on Lookup Courses. If the courses have not been qualified by COPE or they have expired, you will not be able to attach them to your event (see #2 above). When you have added all the courses that will be presented at your Event, click on Proceed to Step 3.
6. Attach a copy of your promotional or marketing literature for the event. Click on Browse to locate the file on your computer. Click on the file to be uploaded and then click on Open. Next, click on Upload this File. **Note:** Please keep file sizes to a minimum and in a format that is easily readable (Microsoft Office document, JPG file, etc.)
7. Attach a copy of the certificate which will be given to the attendees verifying attendance at the meeting or course. Click on Browse to locate the file on your computer. Click on the file to be uploaded and then click on Open. Next, click on Upload this File. **Note:** Please keep file sizes to a minimum and in a format that is easily readable (Microsoft Office document, JPG file, etc.) Click on Download a Sample Certificate for a copy of a sample attendance certificate.
8. If you have any financial or proprietary interests, you must attach a document disclosing this information. Click on Sample Disclosure Form for a copy of a sample disclosure document. If you have nothing to disclose, check the box. Click on Submit disclosure.
9. Select your method of payment (for detailed event fee information see page 9).
 - a. To pay by credit card, click on the Credit Card button. If you have been supplied an invoice code by ARBO and want to be invoiced for this event, click on the Invoice Code button. Click on Submit Choice.
 - i. For credit card payments, enter the billing name and address and the credit card information.
 - ii. Click on Pay Event Fees.
 - b. To pay using your invoice code, enter the code in the box and click on Enter Code.
10. You will receive an email that your event submission has been received. When your event is approved, you will receive another email with the COPE Event #. Please reference this event number in any future correspondence with ARBO. The COPE Event# and Course ID# must be included on all attendance certificates distributed at your event.

COPE EVENT FEES

As of January 4, 2010, COPE Event fees are determined on a sliding scale with three different fee levels based on the geographical scope of the organization administering the event and whether it is a for-profit organization. When you submit your application to become registered as a COPE Administrator/Provider, the fee level for your organization will be determined.

I. Not-for-profits: Local organizations— (city and county)

Event with 1 (1 hour) COPE-Qualified Course– NO CHARGE

Event with 1 (2+ hour) COPE-Qualified Course– \$10.00

Event with 2-5 COPE-Qualified Courses – \$15.00

Event with 6-10 COPE-Qualified Courses – \$25.00

Event with 11 or more COPE-Qualified Courses – \$25.00 + \$4.00 for each course over 10

II. Not-for-profits: State/province and multi-state (including national level) organizations –

Event with 1 COPE-Qualified Course – \$35.00

Event with 2-5 COPE-Qualified Courses –\$45.00

Event with 6-10 COPE-Qualified Courses – \$60.00

Event with 11 or more COPE-Qualified Courses – \$60.00 + \$5.00 for each course over 10

III. For-profit organizations—

Event with 1 COPE-Qualified Course –\$40.00

Event with 2-5 COPE-Qualified Courses – \$55.00

Event with 6-10 COPE-Qualified Courses –\$75.00

Event with 11 or more COPE-Qualified Courses –\$75.00 + \$5.00 for each course over 10

SUBMITTING ATTENDANCE DATA TO ARBO

Administrators are encouraged to submit attendance data to COPE. COPE (through the *OE TRACKER* system) will maintain your records indefinitely. You must submit the attendance data within 30 days following your event. If you need more time, please contact the ARBO office and we will make special arrangements for your event. We will store the information in our *OE TRACKER* database for access by optometrists and licensing boards. You can submit the CE attendance information to ARBO in one of the following ways:

1. **Excel Spreadsheet: (Preferred):** Download a pre-formatted Excel spreadsheet from the ARBO website by clicking on **Administrator Login** and entering your username and password. Click on **COPE Event** or **Non-COPE Course** to download the appropriate spreadsheet. Email the completed spreadsheet to arbo@arbo.org. If you do not have a username and password, contact the ARBO office for an application to become a COPE-Approved Administrator/Provider.
2. **Barcode Scanners:** Use your own barcode scanners or borrow scanners from ARBO (for a minimal shipping & handling fee). We will be happy to provide you with instructions and training on using the scanners. Contact ARBO at least one month in advance of your event to reserve the scanners. After your event, simply return the scanners to the ARBO office and we will upload your attendance data into *OE TRACKER*.
3. **Sign-In Sheet:** You may record attendance on a sign-in sheet and fax it to the ARBO office to be manually entered. As of March 1, 2009, there is a processing charge per course for the ARBO staff to manually enter CE attendance data from sign-in sheets. For 20 or fewer attendees, the charge is \$50; for 21-50 attendees, the charge is \$75; for 51-100 attendees, the charge is \$105 with an additional \$30 charge for every 50 attendees. The attendance information will only be entered into *OE TRACKER*, if it includes the Event ID Number, COPE Course ID Number, Course Date, Attendees' *OE TRACKER* Numbers, Name and Signature.

IMPORTANT:

In order to accurately upload the CE attendance information we must have the attendees' *OE TRACKER* numbers. To save time, please ask your attendees to supply their *OE TRACKER* Number when they register for your event. If they do not know their *OE TRACKER* number, they can easily find it by going to www.arbo.org and clicking on ***OE Tracker Number Lookup***.

SAMPLE FINANCIAL DISCLOSURE

COPE offers this document as a sample for COPE CE Administrators/Providers to use for obtaining financial relationship information. All elements of this form must be included with the course submission should the Administrator/Provider submit the course on behalf of the Instructor. With modification it can be used for lecturers, authors and members of planning committees. **NOTE: COPE CE Administrators/Providers are not required or expected to use this document; it only serves as an example.**

Disclosure of Relevant Financial Relationships

Name: [INSERT NAME]

Activity Title: [INSERT COPE ACCREDITED CE ACTIVITY NAME]

Content of Activity: [INSERT SUMMARY OF CONTENT]

Date of Activity: [INSERT DATE OF ACTIVITY]

First, list the names of proprietary entities producing health care goods or services, consumed by, or used on patients, with the exemption of non-profit or government organizations and non-health care related companies with which you or your spouse/partner have, or have had, a relevant financial relationship within the past 12 months. For this purpose we consider the relevant financial relationships of your spouse or partner that you are aware of to be yours.

Second, describe what you or your spouse/partner received (ex. Salary, honorarium, etc.). [COPE CE ADMINISTRATOR/PROVIDER NAME] does not want to know how much you received.

Third, describe your role:

Commercial Interest	Nature of Relevant Financial Relationship (include all that apply)	
	What was Received?	For What Role?
Example: Company X	Honorarium	Speaker

I do not have any relevant financial relationships with any commercial interests.

My signature on this document confirms all of the following:

- I have read and will comply with the COPE requirements for course qualification. I further agree to notify COPE in writing should any information provided, including financial/proprietary information, change at any time during the three year qualification period of this course.
- I agree that I will keep my presentation free from commercial interest or bias. I will maintain independent control over the content of my presentation, so that it is balanced, objective, presented with scientific rigor and not be for the purpose of promoting products, equipment, etc. (Therefore, my presentation should not be perceived by attendees as a commercial.) I further agree that I will not change the basic content of my presentation following approval.
- I agree to disclose to the audience the existence of any significant financial/professional relationships with the manufacturer(s) of any commercial product(s) and/or the provider(s) of any commercial service(s) discussed in the educational presentation. (Said relationships can include such things as grant/research support, employment, consulting and/or speakers bureau arrangements, major stock ownership, etc.) I will disclose any of these relationships, whether or not there is direct commercial support for the CE activity. This disclosure is made to provide the audience the information on which they can make judgments as to a presenter's objectivity.
- I agree to disclose the attendees; a) when products or procedures being discussed are off label, unlabeled, experimental, and/or investigational (not FDA approved); b) any limitations on the information that is presented, such as data that are preliminary or that represent ongoing research, interim analyses, and/or unsupported opinion.
- I agree I have an ethical responsibility to make appropriate decisions related to my presentation, and all issues involving financial remuneration. (Considerations in this regard could include kickback schemes or multiple remunerations for a single event.)

Signature : _____

Date: _____

COPE INVESTIGATIVE PROCESS

COPE has a process for investigating complaints about courses or events that do not comply with COPE's policies. The following is a summary of the steps involved in COPE's investigative process.

Submission of Complaints

1. Complaints must be submitted in writing to ARBO within 3 months of the activity prompting the complaint.
2. Complaints can refer to a course and/or an event.
3. To trigger investigation, the complaint must claim non-compliance with an active COPE policy.
4. Complaints must include contact information of the person making the complaint; this information will be protected and confidential, except as may be required by legal process.

Complaint Review

1. When received, ARBO staff will alert the COPE Committee Leadership.
2. Staff and committee designee will determine whether complaint is worthy of investigation and what additional information is required for review.
3. Follow-up correspondence regarding decision will be sent to person who filed complaint.

Investigation Due Diligence and Review

1. Staff will contact the Administrator/Provider requesting copies of all course and event attendee evaluations, and attendee list with contact information.
2. Staff may contact the Administrator/Provider requesting additional information and/or documentation.
3. Staff may contact the Instructor requesting additional information and/or documentation.
4. Staff may contact Course and Event Attendees requesting additional information and/or documentation.
5. Staff may contact Corporate Sponsors requesting additional information and/or documentation.
6. Response from Administrators/Providers and Instructors must be received by ARBO within 30 days of the request.
7. COPE Committee Leadership will review documentation and information submitted.

Investigation Findings and Notice

1. The Instructor and/or Administrator/Provider may be found in compliance or not in compliance for the activity reviewed.
2. Notice will be sent to the Instructor and/or Administrator/Provider with an explanation.
3. Should the Administrator/Provider and/or instructor be found not in compliance, COPE may require the Instructor or Administrator/Provider to submit documentation of corrective action within thirty days of receipt of the notice, or rescind the Instructor or Administrator/Provider's ability to produce COPE courses and events.
4. COPE Committee Leadership will review corrective action documentation to ensure it is adequate to address the issue. If it does not adequately describe or document compliance it will not be accepted.

Investigation Outcomes

1. If the Instructor or Administrator/Provider does not respond within the designated timeframe, their ability to present COPE-accredited courses and events will be rescinded.
2. Documentation of investigations and findings will be maintained in the ARBO office and made available to the COPE Committee and considered should there be additional complaints or future investigations.
3. Once a decision is made, notice of investigation outcomes will be sent to the Instructor or Administrator/Provider within 10 days. Possible outcomes include:
 - A. No violations found.
 - B. Minor violation found such that the Instructor or Administrator/Provider may continue their role with COPE pending an agreement to remediate any concerns/processes.
 - C. Significant violation which may warrant revocation of ability to continue as an Instructor or Administrator/Provider.
4. ARBO reserves the right to provide some information about the COPE Investigation Process to State/Jurisdiction Licensing Boards which may include, but is not limited to, the facts and circumstances involved in the complaint and investigation, the name of the Instructor and/or Administrator/Provider involved, the names of the commercial supporters, and the findings.

Appeal Process

1. If you disagree with the findings of the COPE Committee's investigation, you may, in writing, appeal the decision and request a review of the information by the COPE Peer Review Committee. You should include information on why you feel you should be able to continue as a COPE Instructor or Administrator/Provider.
2. If you disagree with the findings of the Peer Review Committee, you may, in writing, appeal the decision to the ARBO Board of Directors. You should include information on why you feel you should be able to continue as a COPE Instructor or Administrator/provider.

GLOSSARY OF COPE TERMS

ARBO

The Association of Regulatory Boards of Optometry (ARBO) is a 501(c)(3) not-for-profit association of regulatory boards of optometry. ARBO's mission is to represent and assist member licensing agencies in regulating the practice of optometry for the public welfare. ARBO created COPE in 1995 as a service to its member boards; COPE is entirely administered from ARBO's administrative offices.

Commercial Interest

A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Providers of clinical service directly to patients are not considered commercial interest. A commercial interest is not eligible to become an approved COPE Administrator/Provider and cannot control the educational content for COPE Approved CE. Under this definition, the following types of organizations are eligible for become approved COPE Administrators/Providers and free to control the content of COPE Approved CE:

- 501C Non-profit organizations (Note: 501C organizations are screened for eligibility. Those that advocate for commercial interests as a 501C organization are not eligible to become COPE Approved Administrators/Providers. They cannot serve in the role of joint sponsor, but can be a commercial supporter.)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group optometric or medical practices
- For-profit hospitals
- For-profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

Conflict of Interest

Circumstances create a conflict of interest when an individual has an opportunity to affect CE content about products or services of a commercial interest with which he/she has a financial relationship.

COPE considers 'CE content about products or services of a commercial interest' to include content about specific agents/devices, but not necessarily about the class of agents/devices, and not necessarily content about the whole disease class in which those agents/devices are used.

COPE

The Council on Optometric Practitioner Education (COPE), a member benefit and program of the Association of Regulatory Boards of Optometry (ARBO). The mission of COPE is to:

- accredit continuing optometric education courses on behalf of state boards on a national basis;
- reduce duplication of effort by state boards;
- create a uniform method of recording continuing education courses on a national basis;
- be the clearinghouse for information about continuing education programs and courses utilized by licensed optometrists to fulfill their continuing education requirements for license renewal; and
- encourage program sponsors to offer high quality CE in appropriate settings with adequate administrative structure

COPE Accredited CE

Continuing education activities that consist of COPE Qualified Courses produced and delivered by COPE Approved Administrators/Providers within COPE Qualified Events.

COPE Approved Administrator/Provider

The organization, group, or entity assuming overall responsibility for program planning, promotion, on-site administration, and financial management of CE events. CE Administrators/Providers must submit an application, agree to abide by COPE rules and regulations and meet specific requirements to become COPE Approved Administrators/Providers.

GLOSSARY OF COPE TERMS...continued

COPE Qualified Course

Courses meeting the requirements of COPE as determined by the COPE Reviewer Process. Qualification of courses is awarded for a term of three (3) years from the date the statement of qualification is issued by COPE. Renewal of Qualification must occur prior to the conclusion of the qualification period. Courses which are designated COPE Qualified have not met full COPE Accreditation. Only when a course is fully accredited will there be guaranteed acceptance by participating licensing boards as CE for maintenance of licensure.

COPE Approved Event

Events produced by COPE Approved Administrators/Providers meeting the requirements of COPE as determined by the COPE Event Review Process. COPE Approved Events must be submitted for COPE Qualified Courses in order that the COPE Course becomes fully accredited.

Corporate Supporter

Any proprietary entity providing educational grants to CE Administrators/Providers.

Course

A structured, educational event specifically designed to impart new knowledge, shared experiences or factual evidence, which is used maintain the level of optometric competence consistent with the statutory requirements of a given state law defining optometry.

Course Category

Each *COPE Qualified Course* is categorized into a generalized content areas developed by COPE to meet the CE requirements for practitioner re-licensure of participating boards of optometry. The instructor, according to the major emphasis of the course content, categorizes each course. Courses may be reallocated to a different content area by COPE during the review process, or at any point subsequent to its acceptance. All COPE Accredited Courses appearing in promotional materials or programs must carry the COPE logo, course ID#, course category and event ID#. The same information must also appear on the documentation provided to course attendees for boards of optometry to use when verifying CE credit for license renewal.

Course Demographics

Key course information critical to the categorization, processing, and review of a course submitted to COPE. Much of this information is entered into a database and is made available to state boards of optometry (attendance and course authentication), program administrators/providers (future program planning), and general practitioners (future CE program attendance planning).

Course Description

This is a brief statement of what the Instructor(s) intends to present. It is a thumbnail sketch summarizing the course in 35 words or less, which is suitable for publishing.

Course Format

The method used to physically teach a course (i.e., Live, Video, Audio, DVD/CD-ROM, Satellite, Written, or Internet/Online).

Course Number

Each course is given a unique identification number when it becomes COPE Qualified. If the course is discontinued after Qualification for any reason, the number is not used for another course. The number consists of up to five digits followed by two letters, which indicates the content area for the course, i.e., 5344-PH, where 'PH' indicates the course content area as Pharmacology. When such a Qualified course becomes COPE Accredited, (i.e., it is being presented by a COPE Approved Administrator/Provider within a COPE Approved Event), this number can be used in promotional materials (with the COPE symbol) for reference purposes. All documentation provided to a doctor for submission to a licensing board, such as a certificate of attendance slip, must include both the COPE Course and Event Numbers. This is necessary as state boards require the numbers when the course documentation is submitted to authenticate the course with COPE records; only then will states award CE credit for license renewal.

GLOSSARY OF COPE TERMS...continued

Course Outline

A Course Outline is a basic guide to the key learning elements contained in a course. Usually laid out in bullet format, a Course Outline should be in sufficient detail so as to permit either the participant or an observer the ability to clearly follow along throughout the presentation. An outline can be considered sufficiently detailed if an observer is able to enter the presentation and after 5 or 10 minutes be able to locate where in the outline the presenter is. As a rough guide, a 1-½ to 2 page outline is typical for a one-hour course.

Course Presentation

The method used to present the information in a course, (i.e., Lecture, Interactive/Workshop, Panel, Symposia/Scientific Lectures, Grand Rounds, Correspondence, Poster, or Internet/Online). More than one presentation method can be used in a course.

Credit Hour

One (1) hour of CE credit is based on 50 minutes of instructional time. COPE only accepts for review courses of at least one (1) in duration. Additional increments of credit are in 0.5 hours, where 0.5 hour of credit is based on 25 minutes of instructional time. For example, 1.5 hours of credit = a minimum of 75 minutes of instruction; 2.0 hours of credit = a minimum of 100 minutes of instruction, etc.

Curriculum Vitae

A CV is a detailed chronological history of a person's educational and teaching experience, and professional accomplishments which qualifies the instructor to teach the course (not a biographical sketch).

Event Number

Each event is given a unique identification number when it becomes COPE Approved. If the event is discontinued after qualification for any reason, the number is not used for another course. All documentation provided to a doctor for submission to a licensing board, such as a certificate of attendance slip, must include both the COPE Course and Event Numbers.

Instructors

1. Instructor

The person (or persons) who actually teach the course, and who assumes responsibility for the educational content and method of presentation of the course.

2. Principal Instructor.

The principal instructor is considered by COPE as the key individual identified with the course, and is the individual who submits the course material to COPE for review and receives all correspondence regarding its disposition. With the exception of courses categorized as Practice Management, Principal Instructors must hold a minimum of doctorate-level degree (O.D., M.D., Ph.D., D.O., J.D., D.D.S., D.C., Pharm.D., LL.D., D.Ed., D.Sc., etc.) or its international equivalent.

3. Co-Instructor.

A co-instructor is an individual who, in conjunction with a principal instructor, may assist and participate in the presentation of a course, but also has the necessary qualifications to give the course independently of the principal instructor should the principal instructor be unavailable due to extenuating circumstances.

4. Adjunct Instructor.

An Adjunct Instructor is an individual whose main function is to support the Principal Instructor with the presentation or preparation of a course. An Adjunct Instructor may assist with the presentation of a course, however, the Principal Instructor must be responsible for presenting the majority of the course and an Adjunct Instructor cannot, under any circumstance, present a course in the absence of, the Principal Instructor.

GLOSSARY OF COPE TERMS...*continued*

Open Access

COPE Accredited CE must be open to all optometrists. COPE Approved Administrators must ensure this by the following:

- No efforts shall be made to exclude any learners.
- Commercial interests cannot invite or select learners, or generate invitation lists.
- Public notice of COPE Approved Events is required.
- If attendance is limited by space requirements, this must be included in all invitations and public notices, with a first come, first served policy.
- Non-members or affiliated parties of a COPE Approved Administrator/Provider must be able to attend the COPE Accredited CE event. Administrators/Providers may adjust the registration fees in a reasonable manner to accommodate them.

Relevant Financial Relationships

Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g. stocks, 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, speaking and teaching, membership of advisory committees or review panels, board membership, and other activities from which remuneration is received or expected. COPE considers relationships of the person involved in the CE activity to include financial relationships of a spouse or partner.

With respect to personal financial relationships, ‘contracted research’ includes research funding where the institution gets the grant and manages the funds and the person is the principal or named investigator on the grant.

With respect to financial relationships with commercial interests, when a person divests themselves of a relationship it is immediately not relevant to conflicts of interest but it must be disclosed to the learners for 12 months.

Reviewer

A COPE recognized and state board-endorsed optometrist or a faculty at an optometric school or college who has volunteered to review courses for qualification and has completed the COPE Reviewer Training Modules successfully. Reviewers serve indefinitely but must periodically re-certify to continue as a Reviewer. They are not compensated for their service. Reviewers are required to examine in detail the course materials submitted to COPE, determine if it is in compliance with the *Criteria for Course Qualification*, and, where necessary, provide appropriate guidance for modification or adjustment.

Urgent Course Approval

The standard processing time for course processing is 30 days upon receipt at the COPE office. An additional fee is required for courses submitted under the 30-day requirement, with a request for urgent processing. In any event no course will be accepted with request for review in less than 14 days.

COPE STANDARDS FOR COMMERCIAL SUPPORT

Standard 1: Independence

COPE Accredited CE must be identified, developed and presented free from the control of a commercial interest.

1. A “commercial interest” is defined as any proprietary entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Providers of clinical service directly to patients are not considered commercial interest. Non-profit or government organizations and non-health care related companies are not considered commercial interests.
2. COPE Approved Administrators/Providers must ensure that any decisions regarding content, format, speaker selection and evaluation are made without any influence from or control of a commercial interest. COPE Approved Administrators/Providers should develop curriculum based on identification of CE needs with determination of educational objectives.
3. Instructors of COPE Accredited CE must develop course material and information independent from any influence from commercial interest.
4. Under no circumstances can a commercial interest produce or deliver COPE Accredited CE or take the role of non-accredited partner in a joint sponsorship relationship.

Standard 2: Resolution of Personal Conflicts of Interest

Every person in a position to impact the content of COPE Accredited CE must disclose all relevant financial relationships to the COPE Approved Administrator/Provider and to the Learners.

1. The COPE Approved Administrator/Provider must be able to show that everyone who is in a position to control the content of an educational activity has disclosed all relevant financial relationships with any commercial interest.
2. Relevant financial relationships are financial relationships in any amount occurring within the past 12 months that create a conflict of interest.
3. An individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, a COPE Accredited CE instructor or an author of CE, and cannot have control of, or responsibility for, the development, management, presentation or evaluation of the COPE Accredited CE.
4. COPE Approved Administrators/Providers must have implemented a mechanism to identify and manage all conflicts of interest prior to the education activity being delivered to the learners.

Standard 3: Appropriate Use of Commercial Support

In order for a CE event to be COPE accredited, all commercial support must be in the form of an educational grant or letter of agreement between the COPE Approved Administrator/Provider and the Corporate Supporter.

1. The COPE Approved Administrator/Provider must make all decisions regarding the disposition and disbursement of commercial support.
2. The COPE Approved Administrator/Provider cannot be required by a commercial interest to accept advice or services concerning instructors, authors, or selection of participants, evaluation methods or other education matters, including content, from a commercial interest as conditions of contributing funds or services.
3. All commercial support associated with COPE Accredited CE must be given with the full knowledge and approval of the COPE Approved Administrator/Provider.
4. The terms, conditions, and purposes of the commercial support must be documented in a written agreement, such as a letter of agreement or educational grant between the commercial supporter that includes the COPE Accredited Administrator/Provider and its educational partner(s). The agreement must include the COPE Accredited Administrator/Provider, even if the support is given directly to the COPE Accredited Administrator's/Provider's educational partner or a joint sponsor.
5. The written agreement must specify the commercial interest that is the source of commercial support.
6. Both the commercial supporter and the COPE Accredited Administrator/Provider must sign the written agreement between the commercial supporter and the COPE Accredited Administrator/Provider. (Electronic signature is acceptable.)
7. The COPE Approved Administrator/Provider must have written policies and procedures governing honoraria and reimbursement of out-of-pocket expenses for planners and instructors.
8. The COPE Approved Administrator/Provider, the joint sponsor, or designated educational partner must pay directly any instructor honoraria or reimbursement of out-of-pocket expenses in compliance with the COPE Approved Administrator's/Provider's written policies and procedures.

9. No other financial incentives shall be given to the director of the activity, planning committee members, instructors or authors, joint sponsor, or any others involved with the supported activity.
10. If instructors are listed on the agenda as facilitating or conducting a presentation or session, but participate in the remainder of the COPE Accredited CE as a learner, their expenses can be reimbursed and honoraria can be paid for their instructor role only.
11. Social events or meals at COPE Accredited CE events cannot compete with or take precedence over the educational courses.
12. The COPE Approved Administrator/Provider may not use commercial support to pay for travel, lodging, honoraria, or personal expenses for non-instructor participants of a COPE accredited event. The COPE Approved Administrator/Provider may use commercial support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the COPE Approved Administrator/Provider, joint sponsor or educational partner.
13. In the event of an audit, the COPE Approved Administrator/Provider must be able to produce accurate documentation detailing the receipt and expenditure of the commercial support.
14. All financial support must be directed through the COPE Approved Administrator/Provider; under no circumstances can the supporter provide any person with influence over the content of the COPE accredited course or event with any financial incentives or direct reimbursement.

Standard 4: Appropriate Management of Associated Commercial Promotion

There must be a clear separation of any type of product, service, and instrument or device promotion with COPE Accredited Courses. These activities, such as commercial exhibits and advertisements must be physically separated from and not interfere with COPE Accredited Courses.

1. Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation, nor can they be a condition of the provision of commercial support for COPE Accredited CE.
2. Product-promotion material or product-specific advertisement of any type is prohibited in or during COPE Accredited Courses. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from COPE Accredited Courses.
 - a. For print, 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 COPE Accredited CE.
 - b. For computer based, 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.
 - c. For audio and video recording, advertisements and promotional materials will not be included within the CE. There will be no 'commercial breaks.'
 - d. For live, face-to-face CE, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during or after a CE event. COPE Approved Administrators/Providers cannot allow representatives of commercial interests to engage in sales or promotional activities while in the space or place of the CE course.
3. Educational materials that are a part of COPE Accredited CE, such as slides, abstracts and handouts, cannot contain any advertising or product-group message.
4. Print or electronic information distributed about the non-CE elements of a COPE Approved Event 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. There must always be a clear separation between advertising and product-group message and educational content.
5. COPE Approved Administrators/Providers cannot use a commercial interest as the agent providing COPE Accredited CE to learners, e.g., distribution of self-study CE activities or arranging for electronic access to COPE Accredited Courses.

Continued on page 18.

Standard 5: Content and Format without Commercial Bias

All COPE Accredited Courses cannot promote specific proprietary business interests and must give balanced coverage to treatment options.

1. The content or format of a COPE Accredited Course or its related materials must promote improvements or quality in healthcare and not a specific proprietary business interest of a commercial interest.
2. Presentations must give a balanced view of therapeutic options. Use of generic names will contribute to this impartiality. If the COPE Accredited Course includes trade names, where available, trade names from several companies should be used, not just trade names from a single company.
3. Instructors may have assistance in the development of a course, including the creation of handouts, slides and objectives, though not from a commercial interest. Any ghostwriting activity must be included in the disclosure to the CE Administrator/Provider and learners .

Standard 6: Disclosures Relevant to Potential Commercial Bias

To maintain transparency, financial relationships with commercial interests of any persons in a position to impact or control the educational content must be disclosed to the learners. This includes instructors and planning committee members.

1. An individual must disclose to learners any relevant financial relationship(s), to include the following information:
 - a. The name of the individual;
 - b. The name of the commercial interest(s); and,
 - c. The nature of the relationship the person has with each commercial interest.
2. For an individual with no relevant financial relationship(s) the learners must be informed that no relevant financial relationship(s) exist.
3. Instructors must disclose ghostwriting activities .
4. The source of all support from commercial interests must be disclosed to learners. When commercial support is ‘in kind’ the nature of the support must be disclosed to learners.
5. ‘Disclosure’ must never include the use of a trade name or product-group message.
6. COPE Approved Administrators/Providers must disclose the above information to learners prior to the beginning of the educational activity.