

## **COPE Standards for Commercial Support (COPE SCS)**

### ***Implementation Processes for COPE Approved Administrators/Providers***

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.
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 and requires an agreement, such as a letter of agreement or educational grant, 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 and reimbursement of expenses.
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 immediately before, during, or after 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.