

UBC CPD

The Division of Continuing Professional Development Faculty of Medicine | The University of British Columbia Musqueam, Squamish & Tsleil-Waututh Traditional Territory City Square 200-555 W 12th Ave | Vancouver BC V5Z 3X7 T 604.675.3777 | F 604.675.3778 cpd.info@ubc.ca | ubccpd.ca

UBC CPD GUIDELINES FOR SUPPORT OF ACCREDITED AND CERTIFIED CPD ACTIVITIES 2020



Background and Context

The primary purpose of Continuing Professional Development (CPD) is to "address the educational needs of physicians and other health care providers in order to improve: the health care of patients" (CMA Policy, Guidelines for Physicians in Interactions with Industry, Standard 21), public health outcomes, as well as the experience of patients and health care providers.

A practical reality is that external financial support is required for the development, delivery and evaluation of many CPD activities. For-profit and not-for-profit organizations often have resources and/or expertise that can contribute to the quality and effectiveness of CPD activities. Whereas the medical profession and organizations that sponsor CPD share a common interest to improve patient care and public health outcomes, the interests of organizations that provide financial and in-kind support for the development of CPD activities are not always congruent with the goal of addressing the educational needs of the medical profession. Therefore, it is essential that the medical profession define and assume their responsibility for setting standards that will guide the development, delivery, and evaluation of accredited and/or certified CPD activities.

The University of British Columbia Faculty of Medicine's Division of Continuing Professional Development (UBC CPD) **Guidelines for Support of Accredited and Certified CPD Activities** outline principles for conducting CPD activities that are accredited and/or certified by UBC CPD. These guidelines are intended to safeguard the integrity of accredited and certified CPD activities from influences that could lead to bias – including but not limited to commercial bias.

The UBC CPD Guidelines for Support of Accredited and/or Certified CPD Activities will henceforth be referred to in this document as the **UBC CPD Guidelines for Support**.

Applicability

The UBC CPD Guidelines for Support apply to all situations where financial or in-kind contributions are made toward the development, delivery or evaluation of a CPD activity accredited/certified by UBC CPD.

Adherence to the UBC CPD Guidelines for Support is required for the accreditation/certification of CPD activities by UBC CPD. Compliance with these guidelines is required throughout all stages of the CPD activity, from development through delivery and evaluation.

Physicians who participate in CPD activities must adhere to the Canadian Medical Association's Policy Guidelines for Physicians in Interactions with Industry. UBC Faculty of Medicine faculty members are also bound by UBC Faculty of Medicine Relationship with Industry Policy and UBC Policy [SC3] on Conflict of Interest and Commitment.

The UBC CPD Guidelines for Support comply with the aforementioned guidelines and policies.

Acknowledgements

The UBC CPD Guidelines for Support were adapted from the National Standard for Support of Accredited CPD Activities ("the Standard"), Draft version 21. The draft Standard was developed by a working group that included members from the College of Family Physicians of Canada (CFPC), Committee on Accreditation of Continuing Medication Education (CACME), Conseil Québécois de Développement Professionnel Continu des Médecins (CQDPCM), Fédération des Médecins Spécialistes du Québec (FMSQ) and the Royal College of Physicians and Surgeons of Canada (Royal College). Physician organizations and other stakeholders provided feedback throughout the development of the Standard.

The UBC CPD Guidelines for Support were developed in consultation with the UBC CPD Advisory Committee and a Support Guidelines Working Group with representation from the UBC Faculty of Medicine Departments of Emergency Medicine, Family Practice, Gynaecology, Medicine, Radiology, Surgery, and the School of Population and Public Health.

The UBC CPD Guidelines for Support of Accredited and Certified CPD Activities were approved by Faculty Executive on November 17, 2015 and will be reviewed annually.

About this document

The UBC CPD Guidelines for Support are organized into seven elements and 33 sub-elements across the domains of Independence, Content Development, Conflict of Interest, Managing Financial and In-kind Support, Recognizing Financial and In-kind Support, Managing Commercial Promotion, and Unaccredited/Uncertified CPD Activities.

The terms "accredited" and "certified" are used together throughout the UBC CPD Guidelines for Support, acknowledging terminologies used by the Royal College of Physicians and Surgeons of Canada (Royal College) and the College of Family Physicians of Canada (CFPC). The UBC CPD Guidelines for Support apply equally to Royal College accredited and CFPC certified programs.

A Glossary of Terms is provided at the end of this document.

Principles

The UBC CPD Guidelines for Support are guided by the following four principles, as detailed in the National Standard for Support of Accredited CPD Activities (the Standard) which came into effect on January 1, 2018.

Trust

Accredited CPD activities must be developed, delivered and evaluated in accordance with educational and ethical standards of Canadian national/provincial CME/CPD accreditation systems, and to minimize the potential for bias in learning that supports physicians in their multiple roles with patients, learners, and the health care system.

Transparency

Physician organizations must disclose to participants information related to the receipt of financial and in-kind support provided by sponsors. Upon request, physician organizations must report on how financial or in-kind support was used.

Accountability

All physician organizations will be expected to adhere to all elements and sub-elements of the Standard and will be informed by the national/provincial CME/CPD accrediting bodies about the process for monitoring adherence to the Standard. Physician organizations will be invited to consult on any future versions of the Standard.

Fairness

The implementation and monitoring of the Standard by national/provincial CME/CPD accrediting bodies will be equally applied to all physician organizations and respectful of the principles of equity, due process, and justice.

Element 1: Independence

This element describes the membership, roles, responsibilities and decision authority of a scientific planning committee.

- 1.1 Every accredited and/or certified CPD activity must have a scientific planning committee (SPC), accountable to the physician organization, that includes representatives of the intended target audience. The SPC is the group responsible for all decisions noted throughout these guidelines.
- 1.2 The SPC may consider data or advice from all sources, but must ensure that decision-making related to the following CPD program elements is under its exclusive control:
 - a) identification of the educational needs of the intended target audience;
 - b) development of learning objectives;
 - c) selection of educational methods;

- d) selection and invitation of all persons involved in development, delivery and evaluation of the CPD activity (e.g. speakers, moderators, facilitators, instructors, authors);
- e) development and delivery of content; and
- f) evaluation of outcomes.
- 1.3 Representatives of a commercial interest or any organization hired by a commercial interest cannot be members of the SPC and cannot participate in any decisions related to CPD program elements a) through f) within 1.2.

Element 2: Content Development

This element describes the processes and requirements for members of the SPC to develop content that is responsive to the needs of the intended target audience.

- 2.1 The SPC must have mechanisms in place to support the development of content and/or materials that address the identified educational needs of the intended target audience. Specific interests of any commercial sponsor must have no direct or indirect influence on the content and/or materials of an accredited and/or certified CPD activity.
- 2.2 A process must be in place to ensure that those responsible for developing or delivering content are informed about the following:
 - the identified needs of the target audience;
 - learning objectives must be based on identified needs, and be learner-centred;
 - content and materials provide a balanced view across all relevant options related to the content area and reflect the current scientific literature;
 - description of therapeutic options must utilize generic (or both generic and trade) names and not reflect exclusivity and branding;
 - presenters must declare any off-label use when making therapeutic recommendations for medications that have not received regulatory approval;
 - every effort must be made to avoid bias, whether commercial or other;
 - disclosure of all relationships with for-profit and not-for-profit organizations is required; presenters must disclosure to participants, both on slides (disclosure, management) and verbally
 - references to evidence used to create content must be included in presentations;
 - time allotment must be adhered to, including time for interactivity such as Q & A; and
 - content and materials must meet professional standards and legal requirements, including the protection of privacy, confidentiality and copyright.
- 2.3 The SPC must have a process to collect from participants their assessment of the degree to which the accredited and/or certified CPD activity:
 - met the stated learning objectives;
 - achieved appropriate balance; and
 - was perceived to be biased.

Collated responses to the bias assessment must be reported to UBC CPD within three (3) months following delivery of the CPD activity.

2.4 The SPC must have a process in place to identify and address instances where CPD activities are not in compliance with the UBC CPD Guidelines for Support, and UBC CPD should be consulted should any instances arise. If no process currently exists, the UBC CPD Non-Compliance Procedures (released November 2018) may be used.

Element 3: Conflict of Interest

This element describes the processes and requirements for gathering, managing and disclosing conflicts of interest to participants.

- 3.1 All members of the SPC, speakers, moderators, facilitators and authors must provide written description of all relationships with for-profit and not-for-profit organizations over the previous two (2) years, including (but is not necessarily limited to):
 - a) any direct financial payments including honoraria;
 - b) membership on advisory boards or speakers' bureaus;
 - c) grants and/or awards for clinical trials or other research;
 - d) patents on any drug, product or device; and
 - e) all other investments or relationships that could be seen by a reasonable, well-informed participant as having potential to influence the content of the CPD activity.

Conflict of interest disclosures of all SPC members must be completed, signed and received by UBC CPD at the time of accreditation and/or certification.

- 3.2 The SPC is responsible to collect and review all disclosed financial relationships of speakers, moderators, facilitators and authors in advance of the CPD activity to determine whether action is required to manage potential or real conflicts of interest. The SPC must also have procedures in place to be followed if a conflict of interest comes to its attention prior to or during the CPD activity. In many cases, ensuring that the financial relationship is fully disclosed, with description of management (how relationship is unrelated to the content), to program participants will be adequate. Otherwise, appropriate COI management strategies include:
 - The presenter is asked to present on a different subject.
 - The presenter alters their financial relationship.
 - The presenter relinquishes control of content of the presentation.
 - Independent expert content review is obtained.
 - On rare occasions, a speaker or SPC member may need to be replaced.
- 3.3 All members of the SPC, speakers, moderators, facilitators, authors must disclose to participants their relationships as described in sub-element 3.1. Management of potential sources of bias must also be described to participants. If no relationships exist, the statement "I have nothing to disclose" is used.
- 3.4 Any individual who fails to disclose their relationships as described in sub-elements 3.1 through 3.3 cannot participate as a member of the SPC, speaker, moderator, facilitator or author of an accredited and/or certified CPD activity. Disclosures are required regardless of whether or not a CPD activity has financial support.
- 3.5 All disclosures must be made available to participants in program materials. Speakers must additionally disclose conflicts both verbally and in writing on a slide at the beginning of a presentation. If slides will not be used disclosures must be included in written program.

Element 4: Managing Financial and In-kind Support

This element provides a description of the requirements for physician organizations and the SPC in receiving and distributing financial and/or in-kind support.

4.1 The physician organization is responsible for the management of all financial and in-kind support for the development, delivery and evaluation of the accredited and/or certified CPD activity.

- 4.2 The SPC cannot be required to accept direction or advice from a sponsor as a condition of receiving financial or in-kind support.
- 4.3 The terms, conditions and purposes by which commercial sponsorship is provided must be documented in a written agreement that is signed by the physician organization and for-profit sponsors. The sponsorship agreement reflects the sponsorship request/prospectus which outlines exactly the opportunities that sponsors would have for supporting an event. In exchange for providing support to a UBC CPD accredited/certified CPD activity, sponsors may have only the following opportunities:
 - a. opportunity to interact with physicians apart from educational sessions;
 - b. table in the exhibit hall, with choice of location depending on the support level;
 - c. limited number of representatives in attendance in sessions, clearly identified and non-participating;
 - d. receive a copy of participant list with only the name and city of those consenting to be on such a list (no contact information), in adherence to privacy policies governing collection and distribution of private information; and
 - e. acknowledgment of all sponsors together, using the name text and/or logo (no product names or colours) may be listed in tiered sponsorship support levels. See 5.1 for permitted sponsor acknowledgement locations.
- 4.4 If exhibits or displays are permitted at an accredited and/or certified CPD activity, every sponsor willing to pay for such space should be given an equal opportunity to display their materials. Different levels of sponsorship are allowed as long as the process is transparent and all sponsors are made aware of the arrangements.
- 4.5 The physician organization must manage all payments to members of the SPC, speakers, moderators, facilitators or authors, who must not be offered or accept any form of payment, subsidy or other compensation from a for-profit sponsor or any organization hired by a for-profit sponsor. The physician organization or SPC may delegate the payment of travel, lodging, legitimate out of pocket expenses and any honoraria offered to members of the SPC, speakers, moderators, facilitators and/or authors to a third-party non-commercial interest only. The physician organization or the SPC must approve what payments are delegated and retain overall accountability for these payments.
- 4.6 Payments to members of the payments to members of the SPC, speakers, moderators, facilitators or authors should be consistent with that which would be made in the absence of sponsorship. It is appropriate for the physician organization to offer reasonable honoraria and/or reimbursement for reasonable travel, lodging and meal expenses. Token consulting or advisory arrangements cannot be used to justify payment or subsidy for time, travel, lodging and/or any out of pocket expenses by members of the SPC or other persons involved with developing, delivering, evaluating or administering the CPD activity.
- 4.7 Participants cannot be offered or accept any payment or subsidies from any commercial interest or any organization hired by a commercial interest for their travel, lodging or any other expenses for participation in an accredited and/or certified CPD activity, with one exception:
 - scholarships or special funds to support trainees (medical students, residents and/or fellows) to
 attend accredited/certified CPD activities; these funds must be approved by each trainee's program
 chair, director, or designate, and must be received and distributed by the physician organization or
 the trainee's program chair.

Participants may claim compensation from residency programs, employers, or provincial CPD support funds, even when activities they attend have received support from these sources.

4.8 For-profit sponsorship cannot cover the entire cost of a CPD activity. Support from commercial interests may help to reduce the cost of registration but participants are required to pay a reasonable registration fee (minimum \$100/day), with the following exceptions:

- where for-profit sponsorship is limited to education grants, and no commercial exhibits or materials are distributed or displayed, and there are no commercial representatives in attendance; or
- or where the physician organization ordinarily charges a yearly membership fee that explicitly includes a reasonable fee reduction or waiver for members attending the CPD activity.

Allied health professionals and trainees may in any case be offered reduced or waived registration fees.

- 4.9 The physician organization, SPC, sponsor or any organization hired by a sponsor cannot pay for or subsidize the travel, lodging or any other expenses of friends, spouses, partners or other family members of:
 - members of the SPC;
 - · anyone involved with developing, delivering, evaluating or administrating the CPD activity; and
 - any participants of an accredited and/or certified CPD activity.
- 4.10 Accredited and/or certified CPD activities must clearly have greater importance and time duration than any associated social activities. Social activities cannot occur at a time or location that interferes, competes with, or takes precedence over accredited/certified CPD activities. The cost of social activities (excluding modest meals and breaks offered during a CPD activity) should be paid by the participants.
- 4.11 Upon request by UBC CPD or sponsors, physician organizations must disclose how financial and in-kind support was received and used for the accredited and/or certified CPD activity.
- 4.12 The physician organization has an obligation to ensure that their interactions with sponsors meet professional standards and legal requirements including the protection of privacy, confidentiality, copyright and contractual laws and regulations.

Element 5: Recognizing Financial and In-kind Support

This element provides a description of the requirements for physician organizations and the SPC in recognizing financial and in-kind support received from sponsors.

5.1 The SPC must recognize and disclose to participants all financial and in-kind support received from sponsors of CPD activities separate from the educational content. All financial and in-kind support received must be recognized using a standard acknowledgement statement presented to participants:

"Funds in support of [Name of CPD activity] were provided as an educational grant to [Name of physician organization]. The funds were independently allocated and disbursed in accordance with the UBC CPD Support Guidelines, adherent to the National Standard."

The SPC may acknowledge sponsor financial and in-kind support in the following locations: Onsite:

- in the introductory/break slides
- in the printed syllabus, clearly separated from educational content
- on poster in the exhibit hall

In electronic formats:

- multi-page conference website: in separate tab
- hyperlinks: must include notice that one is leaving the original site and being redirected to a commercial supporter site
- app: in separate tab

Outside of the designated table in the exhibit area, the following, along with any other forms of sponsor acknowledgment or incentives, are not permitted in the CPD activity materials or communications:

- no company advertisements
- no blurbs describing what a company does in educational program (in exhibitor program ok)
- no trade names, product names or group messages to participants from the event

- no endorsements of the company or its products by the physician organization
- no swag, insets, lanyards or other sponsor materials in delegate bags
- no sponsor acknowledgement in educational program, brochures/flyers, certificates, presenter slides
- no company or product group colours for products that may be associated with content
- no housing of conference on sponsor sites
- 5.2 Beyond the standard acknowledgement statement for financial and in-kind support outlined in 5.1, the linking or alignment of a for-profit sponsor's name or branding strategies to a specific educational session, presentation, meal, break, or social activity within or associated with an accredited and/or certified CPD activity is prohibited. That is, no program element can be named for or branded by a for-profit sponsor or a product.

Element 6: Managing Commercial Promotion

This section defines requirements related to exhibits and the types of materials that can and cannot be displayed.

- 6.1 Product-specific advertising, promotional materials or branding strategies cannot be included on, adjacent to, or appear within any:
 - educational materials, slides, abstracts or handouts used as part of an accredited and/or certified CPD activity
 - activity agendas, programs or calendars of events (preliminary or final)
 - webpages or other electronic media that contain any educational material
- No advertising, promotional materials or branding strategies are permitted to appear on/within locations where accredited/certified CPD activities are occurring (e.g. lecture halls, small group discussion rooms) immediately before, during or immediately after an accredited and/or certified CPD activity.
- 6.3 Commercial exhibits must be arranged in a location that is physically separated from an accredited and/or certified CPD activity. Advertising, promotional or branded materials may not be distributed outside of aforementioned exhibits. In addition, the following must be in place:
 - the proportion of representatives is minimal
 - representatives must be clearly identified on their name badges so there is a visible difference between them and the physicians/other health care provider participants
 - representatives may go into the learning space but only as observers (i.e. non-participating)
 - representatives cannot market products at any point during the event (exhibit hall excepted)
 - · representatives cannot complete evaluation forms or be considered in needs assessments

NOTE: In cases where there is no exhibit hall, and only a few sponsor representatives are attending, these elements must still be in place.

The SPC is responsible to communicate the above requirements to the sponsor representatives and ensure that there is no participation in the education in order to protect the accredited/certified CPD activity and its participants from industry influence.

- The SPC cannot be required to accept advice concerning CPD activity development, delivery or evaluation as a condition of any exhibit, branding strategy, promotion or advertisement.
- 6.5 The only incentive permitted by UBC CPD to be provided to participants to visit sponsor booth is the "exhibitor passport" in which participants receive a stamp/signature for visiting an exhibit booth. The completed passport is entered into a draw for a prize, which must be paid for by the physician organization. Any other forms of participant incentives are not permitted.



Element 7: Unaccredited and/or Uncertified CPD Activities

This section defines the roles and responsibilities of the SPC in relation to unaccredited and/or uncertified CPD activities occurring in conjunction with accredited and/or certified CPD activities.

- 7.1 The SPC and/or physician organization must make every effort to ensure that unaccredited and/or uncertified CPD activities are not scheduled to take place at times or locations that interfere or compete with accredited/certified CPD activities.
- 7.2 Unaccredited CPD activities cannot be listed or included within activity agendas, programs or calendars of events (excluding non-CPD activities such as unfacilitated poster sessions, annual general meetings, unaccredited allied health streams, and social activities). Announcements of unaccredited CPD activities, such as those sponsored by a commercial interest, may be distributed on a page separate from educational materials. It should be explicit to the participants that these activities are not accredited and may be sponsored by a commercial interest.



Glossary of Terms

Source Abbreviations: CMA = Canadian Medical Association; CFPC = College of Family Physicians of Canada; PAAB = Pharmaceutical Advertising Advisory Board; RC = Royal College of Physicians and Surgeons of Canada; Rx&D = Canadian Pharmaceutical Association; NS = National Standard for Support of Accredited CPD Activities

Term	Definition
Accredited CPD activity	An educational event that meets the administrative, educational and ethical standards of the Royal College of Physicians and Surgeons of Canada, College of Family Physicians of Canada or Conseil Québécois de Développement Professionnel Continu des Médecins. Accredited and/or Certified CPD activities include group learning, self-learning and assessment, delivered in a live or electronic format. [NS]. See also Certified CPD activity.
Advertiser	A for-profit organization that shares information about its programs, services and products through space purchased in conjunction with accredited CPD activities or through other venues or media produced by CPD provider organizations. [CFPC/PAAB]
Advisory board	A group that advises the management of a corporation, organization, or foundation based on their knowledge, experience or expertise. [NS]
Author	The developer of content within eLearning modules, abstracts, posters, presentation slides or any other written or visual materials provided to participants of an accredited CPD activity.
Bias	A predisposition that prevents impartiality or which promotes an unfair, limited, or prejudiced viewpoint.
Certified CPD Activity	Certified is the term adopted by the College of Family Physicians of Canada to replace the term "accredited" in the CFPC Mainpro+ program. See also Accredited CPD activity.
CPD provider organization (WG)	An organization that assumes the responsibility and accountability for the development, delivery and evaluation of accredited CPD activities. CPD provider organizations ordinarily meet the definition of a physician organization. [NS]
Commercial interest	For-profit entities that develop, produce, market, re-sell or distribute drugs, devices, products, or other healthcare goods, services or therapies that may be prescribed to patients or employed by doctors in the diagnosis, treatment, monitoring, management or palliation of health conditions.
Conflict of interest (COI)	A set of conditions in which judgement or decisions concerning a primary interest (e.g. a patients' welfare, the validity of research and/or quality of medical education) is unduly influenced by a secondary interest (personal or organizational benefit including financial gain, academic or career advancement, or other benefits to family, friends, or colleagues). [CFPC]
Continuing medical education (CME)	Teaching and learning that meets an identifiable need and designed to enhance medical/clinical knowledge, skills, attitudes, performance or health outcomes. [RC]
Continuing professional development (CPD)	CPD extends beyond the scope of traditional CME (defined above) and includes learning activities focused on competencies across the CanMEDS Framework. [RC]
Exhibitor	An individual or organization having a service contract with a CPD provider organization for displaying and sharing information about their program's services and products in an Exhibit Hall or area that is clearly separate from the location where accredited learning activity occurs. [CFPC]
Facilitator	One that facilitates; especially: one that helps to bring about an outcome (as learning, productivity, or communication) by providing indirect or unobtrusive assistance, guidance, or supervision.

Financial support	Monetary contributions provided by sponsor for the development, delivery or evaluation of an accredited CPD activity, learning resource or tool.
Gifts	Object, money, entertainment or other financial or in kind offered to someone without asking anything in return. Any materials provided to participants other than those used by the SPC &/or CPD provider organization to achieve the learning objectives of the CPD activity.
Incentive	Something that incites or has a tendency to incite to determination or action.
In-kind support	Services, tools or human resources with a monetary value that are provided to an organization in support of an educational activity. [NS]
Moderator	One who presides over an assembly, meeting, or discussion.
Perceived conflict of interest	A perceived conflict of interest is the appearance of a conflict of interest as judged by outside observers regardless of whether an actual conflict of interest exists.
Physician Organization	A not-for-profit group of health professionals with a formal governance structure, accountable to and serving, among others, its physician members through: Continuing professional development Provision of health care and/or Research
	This definition includes (but is not limited to) the following groups: • Faculties of medicine • Hospital departments or divisions • Medical societies • Medical associations • Medical academies • Physician research organizations • Physician clinic • Health authority hospital department or HAMAC • Canadian provincial medical regulatory authorities (MRAs)
	This definition excludes pharmaceutical companies or their advisory groups, medical supply and surgical supply companies, communication companies or other for-profit organizations and ventures/activities. Types of organizations that are not considered physician organizations: • Health authority administration offices • Disease-oriented patient advocacy organizations (e.g. Canadian Diabetes Association). • Government departments or agencies (e.g. Health Canada, Public Health Agency of Canada). • Industry (e.g. pharmaceutical companies, medical device companies, etc.). • Medical education or communications (MEC) companies (e.g. CME Inc.). • For-profit' on-line educators, publishing companies or simulation companies (e.g. Medscape, CAE). • Small number of physicians working together solely and specifically to develop educational programming. [RC /CFPC]
Real conflict of interest	A real conflict of interest exists when two or more interests are indisputably in conflict.
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Scientific Planning Committee	A group of target audience representatives responsible for the identification of the educational needs of the intended target audience; development of educational objectives; selection of educational methods; selection of scientific planning committee members, speakers, moderators, facilitators and/or authors; development and delivery of content; and evaluation of outcomes of an accredited CPD activity. [NS] The SPC may also include members with specific expertise, including e.g. content experts and educational design experts.
Speaker	Individuals selected by a scientific planning committee based on their recognized expertise and skills to prepare and present information or evidence at a planned educational session in an accredited learning activity. [CMA]
Social Activity	A gathering of individuals that enables social interaction. Social activities do not include meals or breaks during a CPD activity.
Sponsor	An individual, group, corporation or organization (for-profit and not for-profit) that provides financial or in-kind support, including goods or services in support of accredited educational activities, learning resources, or tools. CPD provider organizations are not included. [RC]
Sponsorship (RC)	The process by which an individual, group, corporation or organization provides financial and inkind support for the development, delivery or evaluation of an accredited CPD activity, learning resource or tool. [RC]
Support (RC)	The provision of financial and in-kind resources provided by sponsor for the development, delivery or evaluation of an accredited CPD activity, learning resource or tool.