



January 31, 2014

ACCME  
Attn: Call for Comment  
515 N. State Street, Suite 1801  
Chicago, IL 60654

To Whom It May Concern:

I am pleased to submit this comment in furtherance of an earlier response we submitted via the ACCME's online survey on behalf of the CME Coalition. The CME Coalition represents a broad and growing collection of continuing medical education provider companies, in addition to other supporters of CME and the vital role it plays in the US health care system. Its member organizations provide, manage and support the development of healthcare continuing education programs that impact more than 500,000 physicians, nurses and pharmacists annually.

As tireless supporters of ACCME accredited programs, the members of the CME Coalition believe that the proposed ban of the corporate logos of commercial interests in educational materials is misguided and in fact, undermines the goal of increasing transparency and disclosure. Consistent with the ACCME's current rules, we think the corporate logo is a clear indication of a commercial interest's support for an independent CME activity and that it is most easily identified by the learner, regardless of its positioning in educational materials. As a practical matter, placing a text-only acknowledgement of commercial support within a document or webpage may create the impression of hidden support for the program, rather than explicit.

Although we recognize that the ACCME's proposal is intended to address concerns surrounding inappropriate commercial influence, we are not aware of any evidence that the prudent use of corporate logos creates any particular bias or inaccuracy among physician learners. The requirements for compliance with the ACCME Criteria for Accreditation and *Standards for Commercial Support* provide all stakeholders in CME with clear rules regarding the prohibition of inappropriate commercial influence and provide learners with confidence in the caliber and validity of the education they receive. Forcing the elimination of corporate logos would send the message that either current ACCME rules are inadequate or that physician learners are influenced by the appearance of a logo but not a company name in text. The CME Coalition contends that neither is true.

Although we are not aware of any such examples, we acknowledge that some logos may be inappropriate for use on CME, perhaps due to their size or content.

Therefore, we have proposed that stakeholders should adopt commonsense rules for logo use that reflect widely accepted best practices. As you may be aware, the CME Coalition has proposed such guidelines which are posted on our website (<http://www.cmecoalition.org/>). We are in the process of promoting greater industry-wide adoption of these voluntary guidelines.

Finally, we are also concerned that banning corporate logos could have a deleterious impact on commercial support for CME because it would remove one of the benefits commercial supporters receive from supporting CME, namely, the acknowledgement of their commitment to physician education and improved patient outcomes.

Thank you for the opportunity to comment on this proposal. We hope you will continue to allow the CME Coalition to provide our views and thoughts as you move forward on this and other issues that impact the community.

Sincerely,

*Andrew Rosenberg (signed)*

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