

CAI Guidelines for Engaging with Commercial Organizations

Introduction

Who We Are

The Collaborative for Accountability and Improvement (CAI) is a program of UW Medicine that assembles Communication and Resolution Program (CRP) thought leaders, researchers, practitioners, and patient and family organizations to innovate and move the CRP field forward. Our goal is to promote effective CRPs so the response to unintended patient harm meets the needs of patients, families, providers, and healthcare organizations.

To advance our mission, CAI's work is focused in 3 key areas: education and training; research and innovation; and tools and best practices. CAI engages healthcare leaders and organizations, patients and families, defense and plaintiff counsel, medical professional liability insurers, state and federal policymakers, and researchers.

How Commercial Support and Engagement Can Help CAI

To help achieve these goals, CAI seeks and accepts external support in the form of grants, contracts, sponsorships, donations or gifts in support of our mission. CAI also partners with a wide range of organizations in delivering our mission. External support from commercial entities¹ falls into the following broad categories:

- Supporting the development or delivery of innovation/R&D, content, or programming.
- Sponsoring events or other educational programs.
- Helping us undertake initiatives that accelerate the adoption of CRPs nationally.
- Providing unrestricted contributions to general CAI operations.
- Funding by donors that is targeted toward specific CAI program areas.
- Supporting the delivery of CAI conferences or courses, including direct support to programs and presenters, sponsoring participants, and furnishing conference materials.
- Supporting CAI's website (communicationandresolution.org) and CAI's contact management system, which helps to build a community of people interested in CRP and collects and disseminates new ideas, tools, resources, and other content.

¹ Commercial entities are organizations that offer products or services to a market with the intent of making a profit. In a commercial entity, shareholders, partners, investors, or employees may own (or have rights to own) the profits, residual income, or surpluses of the organization. This contrasts with not-for-profit entities (like CAI) where any surpluses or fund balances are held for public benefit and no individuals or entities have any ownership claim. A nonprofit foundation established by a for-profit entity would normally be considered a nonprofit by CAI in evaluating potential sponsorship or funding arrangements.

- Providing support for CAI’s work with healthcare, patient and family, medical professional liability, and attorney organizations to teach new stakeholders about how to engage effectively with CRPs.
- Assisting CAI to reach broader audiences.
- Providing access to skills and resources that CAI does not have available internally.

Guidelines for Commercial Support and Engagement

CAI’s ability to advance CRP implementation depends crucially on maintaining an independent position with respect to commercial products and services. “Independence” is a matter of both actual and perceived relationship with potential sponsors and partners. The fact or appearance of endorsement toward a specific commercial product or service has the potential to damage CAI’s reputation.

With both the benefits and risks of commercial support in mind, CAI has established the following guidelines, which apply primarily to the acceptance of “Commercial Support,” that is, external funds from for-profit corporations, partnerships or other entities selling goods or services related to health and health care, or who otherwise stand to gain financially from association with CAI. These guidelines are in alignment with the policies of the University of Washington².

Guidelines

CAI may accept support from or engagement with commercial entities when an opportunity:

1. Is consistent with CAI strategy, mission, and values:
 - CAI engages with commercial organizations only (a) for unrestricted support for CAI content or programming or (b) for specific projects that are consistent with our mission and business strategy.
 - CAI does not engage with commercial organizations that require an exclusive working relationship.
 - CAI does not accept external funds from organizations that provide products or services that may adversely affect public health, as determined by the CAI Executive Committee. The Executive Committee can consult with the Finance Committee, the Conflict of Interest Committee, or the full Board of Directors, particularly in cases of exception.
 - Any permissions or licensing agreements with commercial entities must adhere to appropriate standards that prevent misuse, unintended use, and modification of

² [University of Washington Grants Information Memorandum 34](#)
[UW School of Medicine Policy on Potential Financial Conflicts of Interest for Commercial and Non-Profit Entities](#)
[University of Washington Trademarks & Licensing Policies](#)

- licensed materials, prohibit modification that changes meaning, and prohibit use of CAI trademarks or logos to endorse company products/services.
- CAI does not permit commercial partners to generate commercial activity around CAI knowledge and resources.
2. Avoids real or perceived conflicts that impair or give the appearance of impairing the ability of CAI program participants to make informed or objective decisions:
 - CAI does not engage in partnership with commercial organizations that directly advance that organization's commercial interests.
 - CAI designs all meetings and events to maximize the impact on CRP adoption and spread. CAI retains control over educational content, selection of speakers, and the review of educational materials.
 3. Preserves CAI's strategic, methodological, and operational independence and control:
 - CAI retains control of the selection of all project personnel.
 - CAI ensures that the design of project activities is consistent with our methods and content expertise.
 4. Transparently discloses all relationships:
 - CAI discloses all sponsored activities that are partially or completely financed by external funds, including funds from commercial entities.
 - Speakers at CAI events are required to disclose whether any part of their presentation resulted from external funding and whether they have any personal financial interest in the subject matter of the presentation.
 5. Acknowledges commercial support or engagement and uses the CAI brand appropriately:
 - Acknowledgment of commercial support or involvement may be included in CAI's publications, meeting materials, web pages, reports of project results, and all other similar materials, as appropriate. Guidance is documented in the CAI Brand Guidelines (current guide last updated in March 2015).
 - CAI permits acknowledgement of commercial support in communications, with advance review and approval of such communications by CAI.
 - Review and approval are required by CAI for narrative statements about CAI made by funders and for use of the CAI name and/or logo.
 6. Is subject to appropriate governance and oversight, including:
 - CAI Executive Committee reviews and approves exceptions to these guidelines, and can consult the Finance Committee or the Conflict of Interest Committee as needed.
 - CAI Executive Committee reports to the CAI Board of Directors on any commercial relationships that are new or unusual in scope or approach.
 - CAI provides a yearly summary of commercial funding received to the Board of Directors for review.
 - CAI Board and staff are required to disclose potential conflicts of interest annually and documentation is maintained through an electronic system.

- Commercial entities providing support to CAI conferences or other programs are not permitted to influence or provide input to the content, design, objectives, methods, or selection of faculty for CAI programs.
 - The CAI Conflict of Interest Policy³ is reviewed and updated annually. New staff are oriented upon hire and current staff are oriented to the policy annually.
7. Meets CAI's standards for administration and accounting:
- Written agreements are required when entering into relationships with commercial entities.
 - Funds received from commercial entities will be fully accounted for in line with CAI's normal high standards of financial management.

CAI reserves the right to terminate a relationship or engagement with a commercial entity if the entity does not meet the guidelines outlined above. A complaint or other notification will be escalated to the CAI Executive Committee for review and input. The Executive Committee will determine whether consultation with the Board of Directors is warranted. Resulting actions will be decided on a case-by-case basis.

Operational Guidance

All CAI staff and leaders are responsible for acting in accordance with these guidelines and the policies of the University of Washington². The following guidance is provided:

- When CAI leaders or staff identify opportunities for CAI to receive commercial support they will promptly bring the opportunity forward through the partner review process.
- Each opportunity for commercial support will be vetted using the guidelines listed above in addition to CAI's normal strategic criteria.
- In case of ambiguity, opportunities will be escalated to the CAI Executive Committee for review and input.
- The Executive Committee will determine whether consultation with the Finance Committee, the Conflict of Interest Committee, or the full Board of Directors is warranted, particularly in cases that are new or unusual in scope or approach.
- Any exceptions to these guidelines will be reviewed and approved by Executive Committee before accepting support.
- These guidelines will be reviewed at least every two years by the Executive Committee and Board of Directors.

³ [CAI Conflict of Interest Policy](#)