

ASiM Attestation Statement

To Determine Status as a Commercial Interest (CI)

1. **Company Mission:** Please describe your organizational mission, focusing on educational responsibilities, and provide your Mission Statement (attached as Exhibit 1)

ASiM's organizational mission is to work in collaboration with only academic medical centers, national medical societies/organizations, teaching hospitals, and other accredited providers to further the lifelong learning of healthcare professionals by making certified activities available in the community. More specifically, we seek to leverage our organizational and logistical planning expertise to optimally execute effective educational interventions, for which the curriculum is the complete and ultimate responsibility of the accredited provider. Our mission statement is attached and marked Exhibit 1.

2. **Parent Organization:** The ACCME defines a parent organization as one that provides support services and/or other resources to your company. In that context, do you have a parent organization?

Yes No

If Yes, please attach as Exhibit 2 their mission statement and an organizational chart containing specific names of individuals and their titles.

Do any members of your parent organization's staff also provide services for any of owned subsidiaries or other companies whose responsibilities require work for hire for pharmaceutical or medical device manufacturers?

Yes No

If Yes, highlight those individuals on the organizational chart you have provided in Exhibit 2.

3. **Sister Company:** The ACCME describes a sister organization as one(s) that report up to the same parent or holding company. Do you have one or more sister companies?

Yes No

If Yes, please describe in the box below whether those companies perform services directly for pharmaceutical or medical device manufacturers.

ASiM's sister organization, American Healthcare Communications, LLC, performs services directly for pharmaceutical and/or medical device manufacturers, including, but not limited to only non-certified medical communication tactical offerings and/or strategies.

4. **Firewalls and Policies: If applicable, please describe your firewall procedures that serve to separate your company's educational work from promotional services offered by sister companies.**

ASiM is not an ACCME-accredited provider; ASiM is solely an educational partner to academic medical centers, medical societies/organizations, teaching hospitals, and other accredited providers for only certified activities (i.e., continuing medical education or "CME"). In fulfilling its role as educational partner, ASiM contributes organizational and logistical expertise critical to the effective execution of these activities. ASiM does not engage with, nor does it provide any services to, pharmaceutical and/or medical device manufacturers. ASiM does not meet the ACCME definition of "commercial interest." ASiM's affiliate, American Healthcare Communications, LLC (hereinafter AHC), provides an array of medical communication services directly to pharmaceutical and/or medical device manufacturers (See Question 3). In so doing, AHC is, as per the ACCME, a commercial interest. If ASiM is contracted by AHC to provide certain "eligible" services, only those ASiM employees not engaged in the instructional design, educational planning, and curriculum development of certified activities are allowed to fulfill such services. "Eligible" ASiM services include payroll and accounting, logistical meeting execution, desktop publishing, Internet programming, and editorial services (i.e., shepherding manuscripts, proofreading, copyediting). See Exhibit 2 for ASiM/AHC firewall policy.

5. **Relationship to Commercial Interests: In addition to work your organization provides to accredited providers, does your company have direct contracts with pharmaceutical or device manufacturers?**

Yes No

If Yes, please describe what the relationship is, and what you do for these companies in the box below.

6. **Verifiability of Compliance:** ACCME providers must be able to verify that educational partners comply with ACCME policies and the *Standards for Commercial Support*. Do you have an executive in your organization whose duties include regulatory compliance?

Yes No

If Yes, please tell us his or her name and describe duties and authorities as the compliance officer in the box below.

Within ASiM's organization, the duties of the Medical Director and Compliance Officer, Dr. Marcello Morgan, include regulatory compliance. In fulfilling his duties specific to regulatory compliance, Dr. Morgan is responsible for ASiM adherence to all ACCME standards, as well as any additional standards of the accredited providers with whom ASiM collaborates. Dr. Morgan is also responsible for monitoring all ACCME actions, deliberations, "calls for comment," and promulgations, especially as they relate to the execution of certified activities. Finally, Dr. Morgan is responsible for educating fellow ASiM employees with respect to how ACCME standards are relevant to our endeavors and individual work assignments.

Exhibit 1

ASiM – Mission Statement

To collaborate with accredited institutional providers to offer community clinicians and healthcare systems certified activities validated by measured improvements in competence, performance, and patient outcomes.

Exhibit 2

ASiM/American Healthcare Communications – Firewall Policy

ASiM and American Healthcare Communications, LLC (hereinafter AHC), and their employees, acknowledge and understand that due to the unique nature of the enterprise in which both companies do commerce, and the fact that both companies are inextricably linked, it is necessary for certain standards and protocols to be established and strictly observed in order to protect and uphold the integrity of the CME enterprise. These standards and protocols are as follows:

- ASiM and AHC will maintain offices in different physical locations
- ASiM and AHC will not share the same mailing address or phone, email, and/or Internet/Intranet systems
- ASiM and AHC employees are prohibited from sharing any and all information specific to company commerce, unless information pertains to execution of certain services (see below)
- ASiM can provide, at its discretion, certain services to AHC, so long as those services do not jeopardize ASiM status as a non-commercial interest, as per ACCME standards; those services are limited to:
 - Desktop publishing
 - Editorial services (i.e., manuscripts trafficking, proofreading, copyediting)
 - Internet programming
 - Meeting logistics
 - Payroll and accounting