Industry Grant Support Guidelines and Policy

In compliance with the ACCME Standards for Commercial Support, Washington University School of Medicine adheres to the following principles in developing and funding Continuing Medical Education (CME) activities. Similarly, all University Departments and Joint Providers who collaborate in CME activities must follow these guidelines when designing and conducting CME activities, as well as groups who may provide funding.

Program Planning and Conduct

- The CME provider (Washington University School of Medicine), or joint CME provider, is responsible for the content of educational programs as well as the selection of speakers.
- Activity planning should be done prior to submitting educational grant requests. It is preferable to request and receive funding from multiple sources.
- CME Provider must make all decisions regarding the collection, disbursement and management of financial support.
- Commercial supporters cannot require CME providers to accept advice concerning teachers, authors or participants, or other educational matters, including content, as conditions of contributing funds or services.
- All commercial support associated with a CME activity must be given with full knowledge and approval of a CME representative.
- Terms, conditions and purposes of commercial support must be documented in a written agreement between the commercial supporter that includes the provider and its educational partners (if jointly provided, all parties must be included).
- Both the commercial supporter and the CME provider must sign a written Letter of Agreement prior to the date of the activity.
- Funds from educational grants should be processed through the CME department.
- If honorarium is to be paid, it must be paid by the CME provider or joint provider, not the commercial supporter. Reimbursement for any out of pocket expenses to any CME faculty or author must also be paid by the CME provider or joint provider.
- Commercial supporters should not provide any other payment to the director of the activity, planning committee members, teachers or authors, joint provider, or any other persons involved with the supported activity.
- Social events or meals associated with CME activities cannot compete with or take precedence over the educational events.
- Arrangements for commercial exhibits or advertisements are independent of educational support and cannot influence planning or interfere with the presentations, nor can they be a condition of the provision of commercial support for CME activities.
- An educational grant does not allow a company to display at a CME educational event. The CME activity planners should determine whether separate exhibits/displays are in order.
- Promotional material or product advertisement of any type is prohibited in the room where CME is taking place.
- Educational materials that are part of a CME activity, such as slides, abstracts and handouts, should not contain advertising or company logos. Generic names should be used; brand names should only be included for clarification.
- Industry representatives who attend CME events should wear University-provided name badges with company affiliation clearly indicated. Company name badges should not be worn.
Financial Requirements and Procedures

Educational Grants

- Commercial support cannot be used to pay for learners to attend. This prohibits use of commercial funds to pay for travel, lodging, honoraria or personal expenses for learners who are not faculty or authors in the CME activity. At the discretion of the course chairperson, expenses for healthcare providers who are in training may be paid. Registration fees or travel expenses for participants at CME activities cannot be paid directly by industry.
- Support from commercial interests must be disclosed to the learners.
- If in-kind donations are used, such as use of company medical equipment for demonstrations or A/V equipment, a signed LOA for in-kind support needs to be obtained and signed by both the company and a Washington University representative prior to the activity. The company providing the support should be acknowledged at the time of the course.
- Industry technical representatives may assist Washington University faculty in the lab setting, and may also be available to troubleshoot equipment issues, or to assist with A/V, camera work, etc.
- Food should not be supplied by industry representatives, or paid for separately by an industry representative.
- Any remaining unspent funds from a CME activity (after supporter reconciliations are complete) should be designated for future educational activities.

Exhibits/Displays

- Exhibit fees are separate and distinct from educational grants. They are not considered commercial support.
- Determination of exhibit space and fees should be made by each CME activity chair or committee.
- For those companies paying a exhibit fee, the chairman of the activity should determine what the exhibit levels are and what is received for those levels.

Industry Representatives

- Industry representatives are defined as any person who is employed by a for-profit organization that produces, markets, re-sells, or distributes healthcare goods or services consumed by or used on patients.
- Industry representatives may attend CME activities at the discretion of the activity chair for the direct purpose of the representative’s own education, when HIPAA guidelines permit. They may not engage in sales or marketing activities. For those industry representatives who wish to attend, we suggest industry representative registration fees be set at minimum to cover the full actual cost of attendance.
- Industry personnel should not attend CME activities such as rounds where protected health information may be presented (HIPAA guidelines). They are not included in the Washington University / Barnes-Jewish Hospital umbrella of patient care team member providers.