



Medical College of Georgia

Academic, Research, and
Student Affairs
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Continuing Education Commercial Support Policy

Policy 5.07

Volume 5: Continuing Education
Chapter 07: Continuing Education
Commercial Support Policy

Responsible Office: Continuing
Education

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Policy Statement

The Division of Continuing Education makes all decisions regarding the disposition and disbursement of the commercial support funds and in-kind support received for Continuing Education activities. Medical College of Georgia Continuing Education shall not be required by a commercial interest to accept advice or services concerning teachers, authors, participants, or other education matters, including activity content and format, from a commercial interest as conditions of contributing funds or services.

Reason for Policy

The Division of Continuing Education is responsible for ensuring that grant funding from commercial entities and exhibit fees are used in compliance with the requirements of accrediting bodies of continuing education and their associated professional disciplines.

Entities Affected By This Policy

All continuing education course directors, course planning committees, course faculty, commercial supporters (sponsors, grantors, and exhibitors), course participants, and university administrators are covered by this policy.

Who Should Read This Policy

Continuing Education course directors, course planning committees, course faculty, commercial supporters, and university administrators should read this policy.

Contacts

Contact	Phone	e-mail/URL
Director, Continuing Education	706-721-3967	http://www.mcg.edu/ce/
Senior Conference Coordinator	706-721-3967	http://www.mcg.edu/ce/med.html
Assistant Conference Coordinator for Medicine	706-721-3967	http://www.mcg.edu/ce/med.html
Dental Conference Coordinator	706-721-3967	http://www.mcg.edu/ce/dental.html
Assistant Conference Coordinator of Dentistry	706-721-3967	http://www.mcg.edu/ce/dental.html
Nursing/Allied Health Conference Coordinator	706-721-3967	http://www.mcg.edu/ce/

Website Address for This Policy

<http://www.mcg.edu/aaffairs/policies/pdfs/p507.pdf>

Definitions

These definitions apply to these terms as they are used in this policy and related policies:

Continuing Education (CE)	Continuing educational activities provided by the Schools of Medicine, Dentistry, Allied Health Sciences, Nursing, and Graduate Studies. This includes educational activities that serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a healthcare provider uses to deliver services for patients, the public, or the profession.
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Overview

In accordance with the requirements of the accrediting bodies for continuing education, the Division of Continuing Education must control the use of commercial support given in the form of unrestricted or restricted educational grants, and exhibit fees paid for the sale of space during continuing education activities.

Process/Procedures:

Section 1: Ensuring Independence of the Educational Activity

- The Division of Continuing Education shall not be required by a commercial interest to accept advice or services concerning teachers, authors, participants, or other education matters, including activity content and format, from a commercial interest as conditions of contributing funds or services.
- All commercial support associated with a Continuing Education activity must be given with the full knowledge and approval of the Division of Continuing Education. No additional funds or in-kind support will be provided to the planning committee members, teachers, or authors beyond those defined in the budget.
- All educational grant amounts will be based on an itemized and estimated budget prepared in advance and shared with the commercial supporter. The total dollar amount of the unrestricted educational grant will be reflected in the Letter of Agreement.
- All commercial support expenditures must be documented and, upon request, provided to the commercial supporter.
- The Division of Continuing Education may seek suggestions from the commercial interest regarding faculty members, content, and other aspects of the Continuing Education activity. However, the commercial interest cannot make the acceptance of advice or services concerning teachers, authors, or participants or other education matters, including content, a condition of support.
- Commercial support may be acknowledged in printed announcements and brochures; however, references must not be made to specific products. Commercially supported social activities should be independent of and not compete with or take precedence over the educational activities. A commercial interest cannot take the role of the non-accredited partner in a joint sponsorship relationship.
- The Letter of Agreement shall define the terms, purposes, and conditions of the grant and shall be signed by the commercial interest, the Division of Continuing Education, and any other provider or educational partner involved in the planning and implementation of the Continuing Education activity. The originating source of the funds shall be considered the commercial interest for purposes of signing the agreement and

acknowledgment. Independence of the Continuing Education provider must be stipulated in the Commercial Support Letter of Agreement.

Section 2: Role of Commercial Interest Representatives

Representatives of commercial interests must agree to abide by the Policies of the Division of Continuing Education and any other regulations or standards that apply as part of accreditation guidelines to the planning or implementation of Continuing Education activities accepting commercial support. In addition, representatives must agree to comply with Medical College of Georgia policies as stated in Letters of Agreement and/or in documents communicated to those representatives.

Section 3: Commercial Entities as Providers

A commercial interest or its representatives shall not provide Continuing Education activities to learners, including the distribution of enduring materials or arranging for electronic access to Continuing Education activities.

- Representatives of commercial interests must not act as the agents of the accredited provider in the planning or implementation of Continuing Education activities.
- Enduring materials may be provided or sold to commercial interests, but Medical College of Georgia shall not make any agreement with a commercial interest for the distribution of those enduring materials to learners. Nor shall Medical College of Georgia make any agreement with a commercial interest to have the commercial interest act as its agent in arranging electronic access to Continuing Education activities.
- Representatives of commercial interests may attend Continuing Education activities, but must conduct themselves in accordance with Medical College of Georgia policies. Medical College of Georgia will monitor representative behavior. Expected behavior includes, but is not limited to, the following.
 - Cannot engage in detailing.
 - Cannot distribute product-promotional materials in the educational setting or the obligate pathway of the activity.
 - Cannot pay directly any teacher or author honoraria or reimbursement of out-of-pocket expenses.
 - Cannot provide any other payment to director of the activity, planning committee members, teachers, authors, joint sponsor, or any others involved with the supported activity.
 - Must register with onsite activity planners.
 - Cannot wear name badge advertising specific products.
 - Cannot participate in the activity by asking questions or inducing participants to ask questions.
 - Cannot develop activity invitations.
 - Cannot invite guests to attend the Continuing Education activity.
 - Cannot pay registration and expenses for attendees.

Section 4: Advertising of Commercial Products

Product-promotion materials or product-specific advertisements of any type are prohibited in or during Continuing Education activities. Promotional activities must be kept separate from Continuing Education.

Section 5: Separation of Education and Promotion of Products

Medical College of Georgia Division of Continuing Education uses the following guidelines to ensure the separation of education and promotion of products:

- Only the Division of Continuing Education may approve marketing or dissemination of information of educational activities to the healthcare community if the educational activity offers continuing education credits.
- Advertisements and promotional materials will not be inserted within the pages of the Division of Continuing Education content. Advertisements and promotional materials may face the first or last pages of printed Division of Continuing Education content as long as these materials are not related to the Division of Continuing Education content they face and are not paid for by the commercial supporters of the Division of Continuing Education activity.
- For computer-based Division of Continuing Education activities, advertisements and promotional materials will not be visible on the screen at the same time as the Division of Continuing Education content and not inserted between computer “windows” or screens of the Division of Continuing Education content.
- For audio- and video-recorded Division of Continuing Education activities, advertisements and promotional materials will not be included within the content of audio- or video-recorded Division of Continuing Education activities. There will be no “commercial breaks.”
- Educational materials that are part of a Division of Continuing Education activity, such as slides, abstracts and handouts, cannot contain any advertising, trade name, or a product-group message.
- Print or electronic information distributed about the non-Division of Continuing Education elements of a Division of Continuing Education activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product-promotion material or product-specific advertisement.

Section 6: Management of Commercial Promotion

Product-promotion material or product-specific advertisement of any type is prohibited in or during Division of Continuing Education activities. Staffed exhibits, promotional presentations, and printed or electronic advertisements must be kept separate from Division of Continuing Education. Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation of educational content, nor can they be a condition of the provision of commercial support for Division of Continuing Education activities.

Section 7: Exhibits

Arrangements for commercial exhibits or advertisements cannot influence the planning or interfere with the presentation of Division of Continuing Education activities, nor can they be a condition of the provision of commercial support for Division of Continuing Education activities.

- Representatives of commercial supporters may attend an educational activity but commercial supporters may not engage in sales activities while in the room where the educational activity occurs.
- A separate form will be used for exhibit arrangements. That form will contain the terms, conditions, and prohibitions regarding exhibits associated with the education activity.
- Exhibit income will be accounted for separately from educational grants.

Responsibilities

The responsibilities each party has in connection with Academic, Research, and Student Affairs Policy 5.07, Continuing Education Commercial Support Policy, are:

Director of Continuing Education	Provides oversight and ensures compliance with accreditation agencies regarding the appropriate use of commercial support.
Senior Conference Coordinator	Manages planning process to include measures to ensure appropriate use of commercial support and separation of education from promotion.
Assistant Conference Coordinator for Medicine	Compiles documentation necessary to comply with accreditation requirements to ensure appropriate use of commercial support and separation of education from promotion.
Dental Conference Coordinator	Manages planning process to include measures to ensure appropriate use of commercial support and separation of education from promotion.
Assistant Conference Coordinator for Dentistry	Compiles documentation necessary to comply with accreditation requirements to ensure appropriate use of commercial support and separation of education from promotion.
Nursing Conference Coordinator	Manages planning process to include measures to ensure appropriate use of commercial support and separation of education from promotion.
Business Manager	Receives, records, and deposits funds from commercial supporters into appropriate accounts.
Registration Manager	Manages planning process to include measures to ensure appropriate use of commercial support and separation of education from promotion. Receives and manages commercial support for grand rounds and joint sponsorships.