



TEXAS TECH UNIVERSITY
HEALTH SCIENCES CENTER
EL PASO

Office of Continuing Medical Education

Operating Policy and Procedure

SOM OP: Appropriate Management of Commercial Promotion

PURPOSE: The purpose of this policy is to describe the appropriate management of commercial exhibits in continuing medical education activities.

REVIEW: This policy will be reviewed on September 1st of each odd-numbered year by the Senior Director for Continuing Medical Education. If a revision to the policy is recommended, the CME Committee will review and approve changes.

POLICY/PROCEDURE:

1. **Policy.** It is the policy of the Office of CME to comply with Standard 4 of the ACCME Standards for Commercial Support relating to the appropriate management of commercial promotion.
2. **Standards for Commercial Support: Standards to Ensure Independence in CME Activities.**
 - 4.1 *Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation, nor can they be a condition of the provision of commercial support for CME activities.*
 - 4.2 *Product-promotion material or product-specific advertisement of any type is prohibited in or during CME activities. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from CME. For print, advertisements and promotional materials will not be interleaved within the pages of the CME content. Advertisements and promotional materials may face the first or last pages of printed CME content as long as these materials are not related to the CME content they face and are not paid for by the commercial supporters of the CME activity. For computer based, advertisements and promotional materials will not be visible on the screen at the same time as the CME content and not interleaved between computer 'windows' or screens of the CME content. For audio and video recording, advertisements and promotional materials will not be included within the CME. There will be no 'commercial breaks.' For live, face-to-face CME, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CME activity. Providers cannot allow representatives of Commercial Interests to engage in sales or promotional activities while in the space or place of the CME activity.*

4.3 Educational materials that are part of a CME activity, such as slides, abstracts and handouts, cannot contain any advertising, trade name or a product-group message.

4.4 Print or electronic information distributed about the non-CME elements of a CME 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.

4.5 A provider cannot use a commercial interest as the agent providing a CME activity to learners, e.g., distribution of self-study CME activities or arranging for electronic access to CME activities.

5 Procedures.

- a. The CME activity manager from the Office of CME shall ensure that commercial exhibits or advertisements do not influence planning or interfere with the presentation.
- b. The CME activity manager shall work with the Planning Committee to set exhibit fees. Exhibits are considered to be product marketing and shall be separate from educational grants.
- c. Exhibits shall be in a room or area separate from the educational activity, and exhibits shall not interfere with the learning experience.
- d. Representatives of commercial products may attend educational activities at the discretion of the CME activity manager. However, no sales or marketing activities shall take place in the educational space.

6 Restrictions.

- a. A commercial interest may not serve as the non-accredited provider in a CME activity.
- b. A commercial interest may not distribute live or enduring educational materials for a CME activity.