

Office for Continuous Professional Development

VUMC OCPD Standard Operating Procedures on Commercial Support and Exhibits

2024

This Standard Operating Procedures (“SOP”) document on Commercial Support exists to provide guidance for staff, faculty, planners, and others in control of content to implement and comply with the VUMC Policy [UPDATED POLICY UNDERGOING FINALIZATION] and the ACCME Standards for activities provided by Vanderbilt University Medical Center (VUMC).

For All VUMC CME activities that accept Commercial Support (defined as financial or in-kind support from ineligible companies) the Office for Continuous Professional Development (OCPD) ensures that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. The support does not establish a financial relationship between the ineligible company and planners, faculty, and others in control of content of the education.

All commercial support management is overseen by the VUMC Office for Continuous Professional Development: commsupp@vumc.org.

Unless otherwise stated herein, the defined terms in this SOP are defined in VUMC Policy, [UPDATED POLICY UNDERGOING FINALIZATION].

PROCEDURES FOR COMMERCIAL SUPPORT

In order to comply with VUMC Policy [UPDATED POLICY UNDERGOING FINALIZATION], VUMC personnel shall follow the below procedures in regard to **Commercial Support**:

- CME Associate/Activity Director notifies OCPD of interest in requesting commercial support when they complete the activity application in Cloud-CME.
- The Activity Director or CME Associate will notify the VUMC OCPD at commsupp@vumc.org about interest in requesting or accepting commercial support from an Ineligible Company.
- The OCPD will provide a commercial support request template letter and a template Letter of Agreement. Utilizing these documents, the Activity Director and/or CME Associate will then send the initial email to each Ineligible Company to request commercial support or respond regarding the Ineligible Companies’ offer to provide Commercial Support, copying the OCPD on these requests.
- The LOA must be between VUMC OCPD and the specific Ineligible Company, signed by both parties, and the total dollar amount of the grant will be reflected.
- All Commercial Support management must be overseen by the VUMC OCPD, and the funds are directly disbursed to the OCPD.
 - The VUMC OCPD accepts funds received from an Ineligible Company as Commercial Support.
 - The VUMC OCPD transfers funds directly to the CME Associate/Department.
 - The CME Activity Director/CME Associate spends Commercial Support funds in one or more of the categories in the budget submitted with the CME application.
- VUMC OCPD must be identified as the payee for funding requests.
- LOAs submitted to VUMC OCPD for signature on or after the start date of a CME Activity cannot be signed by the OCPD and will require that the Commercial Support is not accepted or refunded if already received.

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- The final activity brochure with a listing of all commercial support will be sent via email to the Activity Director and CME Associate 3-5 Business days prior to the activity start date:
 - The Activity Director must attest that no additional changes will be made to commercial support and/or faculty upon receipt of the final activity brochure, 1 business day prior to the start of the activity.
 - The final information in this brochure must be made available to all participants in the educational activity prior to the start of the activity.
- An Ineligible Company may not make direct payments to a joint provider, faculty, or others involved with the CME activity.
- Social events and meals should be modest and must not compete with or take precedence over educational events.
- VUMC OCPD will not use Commercial Support funds to pay for travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of a CME activity.
- VUMC OCPD may use Commercial Support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, joint provider, or educational partner.
- A financial summary must be provided no later than 60 days after the conclusion of the CME activity detailing the amount of Commercial Support funding received and the commercial interests providing the funds and all CME activity related expenses.

PROCEDURES FOR EXHIBITS

In order to comply with VUMC Policy [UPDATED POLICY UNDERGOING FINALIZATION], VUMC personnel shall follow the below procedures in regard to **Exhibits**:

- CME Associate or Activity Director notifies OCPD of interest in requesting Exhibits when they complete the activity application in Cloud-CME.
- CME Associate sends requests to Exhibit to potential Exhibitors.
- CME Associate sends the complete list of Exhibitors to commsupp@vumc.org for OCPD approval at least 5 business days prior to the start date of the accredited educational activity.
- An agreement to Exhibit at a CME Activity must be signed by the exhibitor and submitted to OCPD at commsupp@vumc.org at least 5 business days before the start date of the accredited educational activity.
- All exhibits, ads, or promotion must be kept separate from the CME activity.
- The CME Activity Director and/or CME Associate must produce accurate documentation detailing the receipt and use of exhibit funds. This must be included in the budget that the CME Activity Director and/or CME Associate submits to OCPD.
- See VUMC Policy for additional information regarding exhibiting on campus.
- Any questions regarding these procedures should be directed to OCPD at commsupp@vumc.org.