

## St. Vincent Hospital CME Program

### Do's and Don'ts

#### DO

1. Please know that CME activities are for physicians. Other disciplines are welcome, but the focus of the CME accredited activity must be for physicians.
2. Brochures/flyers/electronic announcements etc. must be pre-approved by the St. Vincent CME office prior to printing and distribution. Appropriate CME language must be included on the advertising pieces.
3. All financial support must be in the form of an unrestricted educational grant with a Letter of Agreement (LOA) and a copy sent to the CME office for the file.
4. Vendor exhibits are separate events and the funds collected from exhibit booth fees may be used to offset the cost of the CME activity. The amount must be provided in the final activity budget.
5. Content, planning and selection of speakers for a CME activity must be free from commercial interest and influence/bias. The activity director for the activity must ensure that presentations are 1) not promotional; 2) evidenced-based; 3) hold no commercial bias and 4) potential conflicts of interest have been resolved.
6. Caution is to be used when selecting speakers whose fiduciary responsibility is to a commercial interest. However, if you do, you must take every precaution to document that the activity meets strict ISMA/ACCME Standards for Commercial Support compliance requirements and potential conflicts of interest have been adequately resolved. Speakers with potential conflicts and/or fiduciary responsibilities to a commercial interest should submit their presentation for content validation review prior to the activity.
7. A speaker's commercial relationships (or lack of relationships) must be announced to the audience prior to the presentation. If the disclosure form is not received prior to the event, the presenter cannot participate in the CME activity or no credit may be awarded for the activity. Though not required, it is encouraged (best practice) to disclosure to the audience the method of conflict resolution.
8. CME credit is only released if all speaker disclosures are on file.
9. The financial disclosure form must be completed by each planning committee member at the very beginning of the CME activity development and kept as part of the CME activity file – before any educational content is discussed, developed or determined.
10. The disclosure form must be completed by each speaker and filed in the CME activity file. The disclosure form must match the power point disclosure slide.
11. Topics and speakers must be selected and/or designed by St. Vincent Hospital partner and not a commercial supporter.

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12. The standard honorarium ranges from \$0 to \$5,000. If the honoraria will exceed \$5,000, the activity director must forward documentation and speaker CV to the St. Vincent Hospital CME office to explain extenuating circumstances. The CME committee will make a decision on the request. Honoraria funds are not available for associates in the St Vincent system.
13. St. Vincent Hospital CME partner must determine the amount of honorarium. The commercial supporter cannot pay the honorarium or determine the amount of compensation.
14. Each activity must have an evaluation process for all CME activities including a question regarding bias.
15. Activity Evaluations must be collected, tabulated (summarized), and submitted to the St. Vincent Hospital CME Office within a reasonable timeframe after close of the activity.
16. A financial report (program budget summary) and copies of all financial transactions (sponsor checks, check requests, honoraria payments, invoices etc.) must be submitted and will be filed in the CME activity file. Also, the information is reported to the ACCME for the PARS report.
17. Exhibit space must be separate from the room where education takes place.
18. Marketing representatives may assist in the audience generation of physician attendees if requested by the accredited provider.
19. Marketing representatives may attend CME education events as an observer only.
20. The commercial supporter must pay a separate fee for an exhibit booth and/or advertisement space.

### **DON'T**

1. Don't forget to update the CME office when there are changes to your CME administrative staff. We want to schedule a training session with the new person as soon as possible.
2. Commercial supporter/marketing representative cannot select the content, topic or speaker for accredited CME events.
3. A CME event cannot be promotional in nature. All activities must be educational and unbiased.
4. Commercial supporter cannot directly pay the speaker honorarium or any other program related expenses.
5. Commercial supporter cannot make the dinner arrangements at the restaurant and pick up the check.
6. Commercial supporter cannot receive exhibit booth or advertisement space when supporting via an unrestricted educational grant. The commercial supporter must pay a separate fee as an exhibitor or to advertise.

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7. Commercial supporter/marketing rep cannot “drop by” with lunch for or during a CME accredited activity. All financial support must be in the form of an unrestricted educational grant to the St. Vincent Hospital CME Office.
8. Neither the commercial supporter, marketing representative nor the speaker can determine the amount of the honorarium. The activity director and CME office determines the honorarium.
9. No commercial marketing materials or logos in the room where the educational activity takes place.
10. The commercial supporter cannot wear a name badge with company logo where education takes place.
11. The commercial supporter cannot market company products to attendees outside of the exhibit area.
12. Marketing representatives may not escort speakers to and from an activity, entertain them before or after the meeting, they cannot provide gifts or cannot directly pay the speaker honorarium or any other program related expenses.
13. Marketing representatives may not participate in question-and-answer session or group discussion.