



TITLE: Educational Events Policy	POLICY DESCRIPTION: Receipt of Vendor Funds for Educational Events
PAGE: 1 of 4	TYPE: Compliance and Ethics
EFFECTIVE DATE: August 1, 2004	REFERENCE NUMBER: HPG.004

SCOPE: All HPG Departments

PURPOSE: To provide direction for the receipt of educational grants from Vendors (*e.g.*, pharmaceutical manufacturers, medical device manufacturers, and other suppliers of medical products, equipment and services) to help underwrite the costs of Educational Events.

POLICY:

1. **Contracts.**

Contracts shall not be entered into with a Vendor for goods and/or services and at the same time obligate Vendor to provide funding for educational events in connection with its agreement. This is not intended to address programs to train colleagues and staff professionals on use of the Vendor's goods and/or services.

2. **Payments to speakers and others providing services for Educational Events.**

All payments to individuals either speaking or otherwise providing services for any Educational Events, must be made in accordance with a written agreement. The amount of compensation cannot exceed fair market value for the services performed.

3. **Grants from Vendors.**

HPG may only accept funds from a Vendor for an Educational Event when:

- HPG is a sponsor of the Educational Event;
- Content and speakers are determined by HPG and not the Vendor;
- Content is not intended to serve only marketing purposes for the Vendor;
- Funds received are not connected with any other business transaction;
- Vendor and HPG enter into a written agreement documenting their respective obligations;
- and
- The Educational Event is otherwise legitimate and bona fide.

DEFINITIONS:

Educational Events - Those events for which the attendees may receive certification towards their professional CME requirements, as well as any other activities that are provided for general educational purposes and are sponsored by HPG.

Vendor – Any entity doing or seeking to do business with HPG.



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PROCEDURE:

A. Vendor Funding for Educational Events

1. Educational Events must be created for the primary purpose of promoting objective scientific and educational activities, and not as a marketing vehicle for Vendors.
2. If the Educational Event is intended to provide CME credit to those in attendance, in addition to compliance with the requirements set forth in this Policy, the Educational Event shall be offered and presented in accordance with appropriate accrediting body standards. If the Educational Event attendees will be healthcare professionals, even if no CME credit is to be provided, compliance with an appropriate accrediting body standards is recommended.
3. HPG must be the principal sponsor of Educational Events. As the principal sponsor, HPG is responsible for:
 - identification of CME needs,
 - determination of educational objectives and content of the Educational Event program,
 - selection of speakers, faculty and others required for providing the Educational Event,
 - selection of educational methods and materials,
 - determination of event schedules, related activities, and event location, and
 - selecting the invitees.

All of the above must be substantially completed before financial assistance from Vendors is sought, provided, or accepted. The substantive component of the event must predominate over any entertainment, meals or recreational activities.

4. Vendor funding may be received to underwrite part, but not all of the cost of Educational Events. A written agreement shall be required to reflect the amount of Vendor funding and its purpose, and any other relevant terms and conditions.
5. Vendor funds must be used to pay legitimate expenses related to the Educational Event, including speaker and faculty fees and expenses, administrative costs, reasonable and modest meals and refreshments, room and equipment rental, supplies, and handout materials. Payment should be by the Vendor directly to HPG and not to the speaker or other provider for the activity.
6. A Vendor may sponsor a function at the Educational Event, such as a reception or meal, and underwrite the entire cost of this activity without processing payment through HPG provided the Vendor handles all arrangements for the event such as location, invitations, menu and



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publicity (*i.e.*, it is a separate function clearly hosted by the Vendor). Meals, receptions, and hospitality should be modest in value and should be subordinate in time and focus to the purpose of the Educational Event, and the per person expense shall not exceed the amount for one entertainment event under the HPG Ethics and Compliance policy number HPG.006.

7. A Vendor must be given promotional credit for having funded Educational Events and/or sponsored functions at Educational Events.
8. The amount of Vendor funding must not be conditioned on the purchase of product or related to the volume of business conducted with a Vendor.
9. Locations for Educational Events should be at clinical, educational, conference, or other settings conducive to an educational program. Programs requiring “hands on” training in medical procedures should be held at training facilities, medical institutions, laboratories, or other appropriate locations.
10. Vendors may purchase advertisement and booth space at HPG sponsored Educational Events, provided such opportunities are made available in accordance with the HPG Vendor Relations Policy, HPG.002, paragraph B.4.
11. HPG may not pay for Educational Event related activities attended by spouses or other guests of faculty or attendees.

REFERENCES:

HPG Code of Conduct, July 1, 2004
HPG Business Relations Statement, July 1, 2004
HPG Vendor Relations Policy, HPG.002
HPG Vendor Promotional Training Policy, HPG.007
Accreditation Council for Continuing Medical Education (“ACCME”):
Standards for Commercial Support of Continuing Medical Education @
http://www.accme.org/pdfs/disclosure_pol.pdf
The ACCME's Essential Areas and their Elements @
http://www.accme.org/incoming/17_system98_essential_areas.pdf
Office of the Inspector General: OIG Compliance Program Guidance for Pharmaceutical Manufacturers: 86 Federal Register 23731 (May 5, 2003) at 23735:
<http://oig.hhs.gov/authorities/docs/03/050503FRCPGPharmac.pdf>

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Pharmaceutical Research and Manufacturers of America (“PhRMA”): PhRMA Code on Interactions with Healthcare Professionals: <http://www.phrma.org/publications/policy//2004-01-19.391.pdf>

Advanced Medical Technology Association (“AdvaMed”): Code of Ethics on Interactions with Healthcare Professionals: www.advamed.org