



American Society of Regional Anesthesia and Pain Medicine

CME Policy

Separation of Promotional from Educational Activities

Title	Separation of Promotional from Educational Activities
Original Approval	02/2012
Revisions	09/2013, 12/2013, 03/2014, 06/2014

Purpose

In compliance with the ACCME Standards for Commercial Support, arrangements for promotional activities (commercial exhibits, advertising, company representative attendance, etc.) do not influence CME planning or interfere with the presentation of educational content, nor are they a condition of the provision of commercial support for CME activities (no quid pro quo). Therefore, ASRA CME enforces the following:

- Exhibit and promotional activity fees separate and distinct from commercial support and not a condition of the provision of commercial support
- Separation of promotional activities from the physical space and place of the educational activity
- Separation of promotional activities from the educational course materials
- Non-CME ancillary events guidelines
- Company representative session attendance guidelines
- Industry may not discuss CME planning or presentation with faculty
- The commercial interest may not be the agent providing access to the CME activity
- Onsite compliance monitoring
- Clearly communicated policy requirements to all companies providing commercial support and/or exhibiting

Definitions

A. Commercial Support

Educational Grant

Educational grants provide financial support with nothing in return and in a ‘hands-off’ manner; typically via the online grant submission process. A signed letter of agreement (LOA) is required for this type of commercial support (see point H below).

In-Kind Support

In-kind support is any material support provided, categorized into the following formal ACCME reporting categories. A signed LOA is required for this type of commercial support (see point H below).

- Durable Equipment
- Disposable Supplies
- Human Parts/Tissue
- Animal Parts/Tissue
- Facilities/Space
- Other

B. Exhibition and Promotional Support

Exhibition

Exhibition refers to any promotional/marketing space provided by ASRA in return for a fee.

Promotional Support

Promotional support is any funding provided in return for a promotional/marketing opportunity offered by ASRA. This includes advertisements, bag inserts, tote bags, lanyards, etc. Non-CME Ancillary Events organized by industry are also included in this category.

Procedure

A. Exhibit and Promotional Activity Fees Shall be Separate and Distinct From Commercial Support

- Complimentary exhibit and/or promotional activities will not be provided to those companies providing commercial support (educational grants or in-kind support).
- A separate and distinct fee must be paid for exhibit space or other promotional activities during the activity for which support was provided.

B. Separation of Promotional Activities from the Physical Space and Place of the Educational Activity

- Absolutely no promotional activities will be permitted in the same room immediately prior to, during, or after a CME activity.
- Exhibit materials must be in a room or area separate from the education, and the exhibits must not interfere or in any way compete with the learning experience.
- All promotional activities including interviews, demonstrations, and the distribution of literature or samples must be made within the exhibitor's space only; canvassing or distributing promotional materials outside the exhibitor's rented exhibit space is not permitted.
- Specific times are established for exhibit viewing and/or other promotional activities (including industry-organized non-CME ancillary events).
- Food and beverage may be served by ASRA in the exhibit hall in order to encourage interactions between attendees and exhibiting companies.

C. Separation of Promotional Activities from the Educational Course Materials

- ASRA does not include any product promotional information in its educational materials that are used to support learning during a CME activity (copies of slides, handouts, abstracts, etc.).
- Exceptions to this include:
 - The required commercial support disclosure (company name only in text format; no logos, trade names, or product group messages).
 - Logistical information such as the time/location of industry-organized non-CME ancillary events, exhibitor listing, etc.
- Promotional information is only allowed in logistical support materials (printed program guide, tote bag, etc.). Promotional materials in the program guide will be grouped in a section in the back of the program. Advertisements will be allowed on the back cover. All such materials must be distributed outside the educational meeting room.

D. Non-CME Ancillary Event Guidelines

- Any educational session directly influenced, organized, or financed by industry will be considered an industry-organized Non-CME Ancillary Event.
- Separate times for ancillary events (not competing with educational sessions) will be made available.
- These promotional activities will not offer CME credit by ASRA or another provider.
- The content outline and speaker selection must be submitted to ASRA for approval by the Scientific/Education Planning Committee two months prior to the activity.
- Industry supported promotional sessions will be clearly indicated in the meeting timetable/program as: "Non-CME ancillary event organized by..." (the term "sponsored" is not to be used).
- Promotional/marketing materials created by the company must include:
 - "Non-CME Ancillary Event organized by: Company ABC"
 - "The American Society of Regional Anesthesia and Pain Medicine (ASRA) has provided space for this non-CME ancillary event. The program was independently produced, not subject to review by ASRA, and is not part of the scientific/educational program offered by ASRA."

E. Company Representative Participation Guidelines

- Commercial Support (grants and/or in-kind):
 - Complimentary registrations will not be provided to those companies providing commercial support; a separate and distinct fee must be paid for attendance during the activity for which commercial support was provided.
- Exhibition and Promotional Support:
 - Companies paying the exhibit fee will receive a pre-determined number of exhibitor badges, depending on the size of booth space purchased.
 - Exhibitors are allowed to attend the main meeting sessions at no charge (priority seating to paid participants); standard registration fees must be paid for participation in PBLDs, workshops, special events, etc.
 - In order to receive CME credit, the company representative must register as a learner and pay the appropriate fees.
 - Absolutely no promotional activities or conversations will be permitted in the educational rooms immediately prior to, during, or after a CME session.
- In-Kind Technical Support:
 - In-kind support is sought from multiple companies, except when other equal but competing products or services are not available, therefore, therefore representatives from multiple companies will participate.
 - A limited number of technical support badges will be provided for those companies providing support in-kind, requiring representatives to demonstrate the operational aspects or ensure proper functioning of a device.

- Participation is managed in strict compliance with the ACCME's Accreditation Criteria and Standards for Commercial Support.
 1. ASRA is responsible for all decisions regarding the educational elements (planning, content, faculty selection, presentation, evaluation, etc.). Industry representatives in no way influence any portion of the CME activity; including how the in-kind support will be used or allocated to the educational sessions.
 2. Industry employees shall be easily identifiable by their company and meeting badges.
 3. The industry representative shall only contribute **technical information about the use of the equipment**.
 4. **The industry representative shall NOT** expand his or her input into areas of clinical medicine such as:
 - Indications for use
 - Comparisons between competing products
 - Comparisons between the device, invasive surgery, and/or medical treatment.
 5. ASRA's faculty and staff provide strict supervision to ensure proper professional behavior by industry representatives.
 6. ASRA reserves the right to physically limit the technician's access to the educational setting, requesting the technician's participation only when questions arise or further assistance is needed.

F. Industry May Not Discuss CME Planning or Presentation with Faculty

Industry representatives shall not influence CME content in any way. Companies should never approach planning committee members or faculty to discuss the planning, presentation, or evaluation of the CME content. Faculty have been instructed to refrain from any such discussions.

G. Commercial Interest May Not Be the Agent Providing Access to the CME Activity

- ASRA never uses a commercial interest as the agent providing a CME activity to learners (distribution of self-study CME activities or arranging for electronic access to CME activities).
- ASRA may provide a commercial interest with a limited number of brochures for audience generation only, but this is never the sole marketing method (others include direct mail, email promotions, etc.).

H. Onsite Monitoring

The separation of promotional materials and activities from the educational arena is strictly enforced throughout the activity by ASRA's onsite staff.

I. Commercial Support Letter of Agreement (LOA)

The commercial interest and ASRA will agree in writing to abide by all requirements of the ACCME's Standards for Commercial Support, including, but not limited to all terms, conditions, and purposes indicated in the formal ASRA LOA. A company's own LOA may replace the ASRA standard agreement, but must comply with all ACCME accreditation criteria, Standards for Commercial Support, and related policies. The LOA will be signed by both parties and dated prior to the activity.

J. Communication of Requirements to Exhibiting Companies

These policies and procedures are communicated to companies providing commercial support in the ASRA Commercial Support Letter of Agreement and to exhibiting companies in the activity's Exhibitor Prospectus.