

THE CME MEETING: Center for Continuing Medical Education Policy on Peripheral Activities Associated with a CME Activity.

The CME meeting consists of all functions associated with an approved CME activity, including all peripheral activities such as food functions and displays. Any function that is present in the same location as a CME activity and is present because of the CME activity must be considered part of the CME meeting. Therefore, all peripheral activities are regulated by CME guidelines.

PERIPHERAL ACTIVITIES

I. DISPLAYS

Commercial displays/exhibits/advertisements are promotional activities and not continuing medical education. Monies paid by commercial interests to providers for this promotional opportunity are not contributions or ‘commercial support’ of CME. A letter of agreement is not required for promotional opportunities. CME Activity Directors/Coordinators must advise vendors that payment for promotional opportunities should come from resources designated for that purpose. Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation, nor can influence be a condition of the provision of commercial support for CME activities. Product-promotion material or product-specific advertisement of any type is restricted to the function area designated for this purpose and is prohibited in facilities specific to the CME activity.

Non-commercial displays, such as poster sessions, may have an educational component that may be approved for CME credit. As such, non-commercial displays may not promote or sell commercial products. Non-commercial displays approved for CME credit must be distinctly separate from commercial displays. A schedule of access to this type of display must be available to participants, and the CME Activity Director/Coordinator must be able to document participation.

a. Application for Display

CME Coordinators must submit a signed **CCME Application for Display** from all commercial and non-commercial participants expecting to display at a CME activity prior to the date the CME activity convenes. The Application for Display identifies the CME Activity and date for which the display is intended; the site of the Activity; a description of the display area and the display space; the cost/fee options for displaying; and set-up and tear-down times. A description of privileges, prohibitions, and conduct must accompany the Application for Display and must be initialed by a company representative where designated.

Vendors planning to display at a CME activity must comply with the Wexner Medical Center’s Vendor Interaction Policy, which takes precedence over any document or agreement provided by the vendor. Non-compliance with this requirement is regarded as

non-compliance with the Vendor Interaction Policy. CCME reserves the right to deny display privileges to any vendor not complying with the Application requirement; and non-compliance may also affect certification of the CME activity.

CCME will assess the activity \$25 to administer and evaluate the Application for Display, and to insure compliance with all policies on commercial displays.

b. Vendor Display Agreements

Submission of a letter of agreement to display by a vendor will not be accepted as a substitute for the CCME Application for Display. While vendor display agreements may be accepted and signed to satisfy vendor requirements, these agreements may not include conditions that concern educational planning or content. Nor may these agreements require compliance with any conditions on debarment or exclusion, indemnification, arbitration, or governing law. CCME will regard any insistence by a vendor to include amended versions of these conditions into their display agreement as a *de facto* educational grant agreement to be treated according to CCME and ACCME Policies on Commercial Support. Therefore, a display opportunity is not a privilege of the educational grant agreement.

c. Display Privileges

Most privileges are determined by the Activity Director/Coordinator and may include the numbers of display participants, or attendance at other peripheral functions. In compliance with the Accreditation Council for Continuing Medical Education (ACCME®) and its Standards for Commercial Support, attendance at CME activities is permitted by commercial supporters, as long as they refrain from commercial activities within the meeting room. This includes removing their company name badge while in the meeting room. Furthermore, when space and materials are limited, company representatives need to defer to non-commercial registrants. Commercial supporters are encouraged to register in advance so that they are included in preparations made by the conference coordinator.

Prohibitions are determined by CCME and include a ban on any commercial activity within the facility specific to the CME Activity; proscription on direct sales of any commercial products; the exclusion of illegal services, products or activities, those not appropriate for a scientific venue, or those espousing philosophies or actions contrary to the mission and ethics of The Ohio State University. CCME encourages attendance of exhibitors, commercial and non-commercial, in the approved CME Activity subject to prohibitions; and allows them to ask questions in scientific sessions as long as they disclose their commercial relationship(s).

d. Pricing Display Space

CME Coordinators may only assess market value for display opportunities. The determination of market value considers:

- Actual cost of arranging display space
- Size and profession of audience
- Location of meeting site and display area

- Relative premium of display space
- Size of display space
- Cost of participating in food and beverage functions
- Cost of providing educational materials

Market value should not consider:

- Vendor's financial offers or appeals for discounts
- Vendor's approval of an educational grant
- Relationships between vendors, CME coordinators, or activity faculty
- Access to mailing list or registration lists

CCME recommends that display opportunities for meeting sites in Ohio have a market value between \$500 and \$2000 based on the market value considerations listed above. Activity Directors must be prepared to justify display pricing using principles of market valuation. Pricing of displays, including any differential pricing based on the quality of the display space must be submitted to CCME prior to any solicitation for displays. CCME recommends that these display prices be included in the budget submitted with the Category 1 application. CCME may request a floor plan of the display venue when significant pricing levels are planned. All vendors must be provided the complete display pricing list and given the option to select from the differential pricing. CCME regards that it is never appropriate to provide gratis display space to a commercial vendor or to accept "in-kind" payment since doing so implies favoritism or a potential conflict of interest. Discounting display opportunities is also inappropriate since it implies favoritism; however, activity directors may discount display fees up to 25% if space remains available in the final two weeks prior to the activity.

e. Designing the Display Area

Displays and display areas may not be designed in such a way as to compel meeting participants to pass through a commercial gauntlet to enter the meeting area, or to proceed to other function areas, such as to meals or breaks. The interests of the exhibitors must be considered, so access to other function areas need not be completely free of displays.

Designing premium display spaces is permitted, subject to the following conditions:

- CME participants are not compelled to visit premium spaces.
- Market pricing is maintained.
- All displays have the same opportunity to reserve premium space, subject to availability; that is, conditions may not be established that give exclusive rights to certain vendors.
- Price, display size, and location may be considered when defining premium space.