

## Drexel University College of Medicine/Office of Continuing Medical Education

### Commercial Supporter Dos and Don'ts

Drexel University College of Medicine (DUCOM) welcomes commercial support for our CME activities. DUCOM's compliance guidelines are consistent with guidelines and recommendations published by the ACCME, the OIG the Pharma Code and the FDA. Follow these instructions when working with commercial supporters and marketing representatives from pharmaceutical and/or medical device companies.

#### **Do**

1. Commercial supporters cannot be involved in the planning of the educational activity, suggest or influence the selection of speakers or the content of the activity.
2. The presentation must be evidence based scientifically rigorous, bias free and based on the best available evidence from medical literature.
3. Topics and speakers must be selected by the accredited provider or our designee (joint provider).
4. The accredited provider, or our designee, must determine the amount of the honorarium. The commercial supporter cannot pay the honorarium or determine the amount of compensation.
5. The *Disclosure of Relationships and Declaration Form* must be completed and forwarded for each speaker at least 4-8 weeks prior to the activity.
6. A speaker's commercial relationships (or lack of relationships) and the method used to resolve potential conflicts of interest must be announced to the audience prior to the presentation. If the *Disclosure of Relationships and Declaration Form* is not received prior to the educational event, a potential speaker cannot participate in the CME activity.
7. All financial support must be in the form of an educational grant and must be preceded by a Letter of Agreement (LOA).
8. The LOA is between and signed by the commercial supporter and DUCOM's Office of Continuing Medical Education as the Accredited Provider. Checks are made payable to ***Drexel University College of Medicine*** or our approved designee.
9. A fully executed LOA (with all appropriate signatures) must be forwarded to the accredited provider.
10. The Exhibitor Contract is between the CME Provider and commercial supporters who wish to exhibit at the activity. A signed Exhibitor Contract is required from all Exhibitors. The Exhibitor Contract must be signed by the Commercial Supporter and Assistant Dean of CME. Checks are made payable to ***Drexel University College of Medicine*** or our approved designee.
11. The accredited provider must be notified if there will be commercial exhibitors at the activity.
12. Exhibit space must be separate from and not adjacent to the room where education takes place.

## **Commercial Supporter Dos and Don'ts**

### **Don't**

1. Company marketing representatives cannot “drop by” or pay for lunch during a CME accredited activity. All financial support must be in the form of an educational grant to DUCOM.
2. Commercial supporter/marketing representative cannot select the activity topic or speaker.
3. Commercial supporter cannot pay speaker honorarium or any other program related expenses directly.
4. Speakers cannot be full time employees of the commercial supporter.
5. Commercial supporter cannot make the dining arrangements, select the venue or pick up the check.
6. Neither the commercial supporter, marketing representative, nor speaker can determine the amount of the honorarium.
7. If the commercial supporter sends a representative to the event, the representative cannot contribute to or engage in the discussion during the presentation.
8. The commercial representative cannot wear a name badge in the room where education takes place.
9. No marketing materials can be distributed in the room where education takes place.
10. The commercial supporter cannot market company products to attendees outside of the exhibit area.

### Contact information:

Office of Continuing Medical Education  
Drexel University College of Medicine  
1427 Vine Street ▪ 4<sup>th</sup> Fl, Room 405 ▪ Mail Stop 1013  
Philadelphia, PA 19102  
Phone 215.762.2580 ▪ Fax 215.762.2589