

Policies and Procedures**Title: Commercial Promotion and Participation***Policy Number 7140.1***Administrative Approval:**

Norton Healthcare System CME Committee

Statement of Purpose

As a provider of continuing medical education accredited by the Kentucky Medical Association (KMA) and adhering to the guidelines set forth by the Accreditation Council for Continuing Medical Education (ACCME), Norton Healthcare has created a policy for the appropriate management of the promotion of commercial entities during live and enduring educational activities. This policy outlines guidelines to ensure that all educational activities are free of any commercial biases and/or promotion when a commercial entity participates in an educational activity as an exhibitor and/or advertiser.

Note: As defined by the ACCME, an advertiser or exhibitor is not considered a commercial supporter, for commercial supporter guidelines please refer to the "Commercial Support" policy.

Attendance / Participation Guidelines for Commercial Entity Representatives / Exhibitors

- Representatives from commercial interests are not to engage in sales, promotional activities, or distribute product-specific advertisements of any type while in the designated location of the CME activity. This is prohibited in or during CME activities.
- All discussion, promotions of products and/or services are only allowed in the designated exhibit space; these activities may never occur formally or informally in the actual educational space, even if the activity is not in session.

Exhibit/Exhibitor Guidelines

- If commercial exhibits are part of a continuing medical education activity, it is prohibited for the commercial entity to influence, participate in or interfere with the presentation. Additionally, this cannot be a condition of their participation in the activity.
- Exhibits will not be located in the same room/space where the educational activity is being held. Exhibit tables will be located in a distinctly separate location from the educational activity.
- CME activity space includes but is not limited to lecture halls, break-out rooms and laboratory areas.

Promotional / Advertising Guidelines**Live Activities**

- No advertisements and/or promotional materials will be displayed or distributed in the educational space, immediately before, during or after a CME activity.

Printed Materials / Electronic Information

- Advertisements and promotional information will not be interleaved within the pages of the CME content.
- Advertisements and promotional materials may face the first or last pages of printed CME content, if these materials are not related to the CME content they face and are not paid for by the commercial supporters of the CME activity.
- If advertisements and promotional materials are computer-based, they are not to be visible on the screen at the same time as CME content or interleaved between computer 'windows' or screens of the CME content.
- Print or electronic information distributed about the non-CME elements of a CME activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product-promotion material or product-specific advertisement.

Computer-based CME Activities

- CME activities are not to be placed on a web site owned or controlled by a commercial interest.
- Advertising of any type is prohibited within the educational content of CME activities on the Internet including, but not limited to, banner ads, subliminal ads and pop-up window ads.
- Advertisements and promotional materials may not be visible on the screen at the same time as the CME content and not interleaved between computer windows or screens of the CME content.
- If there is a link to a commercial site, this is only permitted before or after the CME activity. Notification of the learner leaving the site of the web-based CME activity must be clearly visible.

Audio / Video CME

- There are no advertisements and promotional messages "commercial breaks" permitted within a CME activity.

Journal Materials

- Advertising or product group messages of commercial interests are not allowed on any elements of journal-based CME. The learner must not encounter advertising within the pages of the article or within the pages of the related questions or evaluation materials.

Presentations

- Educational materials that are part of a CME activity, such as slides, abstracts and handouts, cannot contain any advertising, corporate logo, trade name or a product-group message of an ACCME-defined commercial interest.