# Procedures for Commercial Support and Exhibiting/Advertising

## Pre-Activity
- Notify TUSM OCE of intention to apply for commercial support (this can be done in the Planning Form).
- TUSM OCE must review commercial grant application(s) before submission.
- Notify TUSM OCE of intention to solicit exhibitors (this can be done in the Planning Form).
- TUSM OCE must review any company support invitation booklet/materials prior to distribution.
- Obtain a signed TUSM OCE agreement from confirmed exhibitors.
- Obtain a signed Letter of Agreement (LOA) from the Commercial Supporter for any approved funds. TUSM OCE has a generic template you may use if the commercial supporter does not provide an LOA upon grant approval. 
  
  **Please note that TUSM OCE must be listed on all LOAs as the accredited provider and must sign the agreement prior to the activity.**

## During the Activity
- Acknowledge all commercial supporters and exhibitors in course syllabus materials/slides. **Company logos are NOT permitted in any of the educational materials/handouts or content.**
- Ensure that exhibitor/advertising space is separate from the space where the education is taking place. No promotion is permitted in the educational space.
  - **Live CE** - Advertisements and promotional materials cannot be displayed or distributed in the educational space.
  - **Computer/Internet based CE** - Advertisements and promotional materials will not be visible on the screen at the same time as the CE content and not interleaved between computer ‘windows’ or screens of the CE content.
  - **Print CE** - Advertisements and promotional materials may only face the first or last pages of printed CE content as long as these materials are not related to the CE content they face and are not paid for by the commercial supporters of the CE activity.
  - **Audio and video recorded CE** - Advertisements and promotional materials will not be included within the CE. There will be no commercial breaks.

## Post-Activity
Many funders require reconciliations post-activity. Please retain receipts for all expenses related to the educational activity and if applicable, submit to TUSM OCE for reconciliation of grant funds.

## Important Information About Commercial Support for Continuing Education

*A commercial supporter is defined as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.*

- If a company requires that the accredited provider submit a grant application, please note that TUSM OCE will assess a $250 fee per grant application. We suggest you include these anticipated fees in your activity budget.

- Payments that are required to come directly to TUSM OCE must be made payable to “Trustees of Tufts College.” Tufts University will retain 15% of the total amount received by TUSM OCE. These fees should be included within the administrative fees of your activity budget.

- As of August 1, 2013, *The Sunshine Act/Open Payments* Reporting requires commercial supporters to report all transfers of value made to physicians and/or other healthcare professionals. You must adhere to any Sunshine Act Reporting Requirements as required by funders. This may involve obtaining attendee and faculty information and submitting to funders for reporting purposes.

  **Commercial supporters are NEVER permitted to be involved in the selection of topics or speakers for a continuing education activity. They may not pay faculty or planning members directly for their involvement in the activity.**

For more information, please visit: [ACCME’s Standards for Commercial Support](#) and [Sunshine Act/Open Payments](#)