SOM OP: 60.12 Appropriate Use of Marketing and Promotion

PURPOSE: The purpose of this policy is to describe the appropriate management of marketing and promotional advertisements, announcements, flyers and brochures.

REVIEW: This policy will be reviewed on September 1st of each odd-numbered year by the Managing Director for Continuing Medical Education. If a revision to the policy is recommended, the CME Committee will review and approve changes.

POLICY/PROCEDURE:

Policy

It is the policy of the TTUHSC Office of CME to abide by the ACCME Standards for Commercial Support specifically, all of Standard 4 and to comply with Criterion 9 of the ACCME accreditation criteria. Additionally, we will use without alteration, the accreditation and designation statements provided to us and trademarked by the AMA as described in the AMA PRA Handbook. The accreditation and credit designation statements are to be used on print and electronic formats (e.g. course syllabus, credit certificate, landing page of internet activity or enduring material, etc.) TTUHSC Office of CME must review and approve all advertisements, announcements, flyers and brochures prior to printing and/or distribution.

Procedures

1. All print and electronic flyers, brochures, front matter/landing page and announcements* must contain the correct accreditation and credit designation statements.

For directly provided activities:

Accreditation Statement
The Texas Tech Health Sciences Center is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians.

Credit Designation Statement
Texas Tech Health Sciences Center designates this [learning format] for a maximum of [number of credits] AMA PRA Category 1 Credit(s)™. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

For jointly provided activities:

Accreditation Statement
This activity has been planned and implemented in accordance with the accreditation requirements and policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint providership of Texas Tech University Health Sciences Center and [unaccredited partner/provider]. Texas Tech University Health Sciences Center is accredited by the ACCME to provide continuing medical education for physicians.

Credit Designation Statement
The credit designation statement is exactly the one above with no changes.

For co-provided activities:

The two accredited organizations must determine which organization will extend the credit. The organization approving the activity for credit will use their directly provided credit designation statement. The accreditation statement will be worded:

*Note: Announcements are informational pieces, not promotional in nature.
Accreditation Statement
This activity was co-provided by the Texas Tech Health Sciences Center and [name of accredited provider partner]. The Texas Tech Health Sciences Center is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

*Exception: Save the Date announcements that do NOT identify the number of credits being offered, are not required to have the accreditation and credit designation statements. Save the Date announcements may state "This activity has been approved for AMA PRA Category 1 Credit(s)™" or similar language.

2. The Office of CME must approve all marketing materials before circulating or printing. Required components are:

   a. Accreditation and designation statements with trademark and italics - EXACTLY as given to accredited providers by the AMA and ACCME.
   b. Disclosure of all who control content (landing page of enduring materials, brochures, flyers, evaluations for Grand Rounds, syllabi)
   c. Correct (without use of logos or marketing messages) acknowledgement of grant support from commercial interests (Compliance with ACCME SCS 6.3 and 6.4)
   d. ADA policy
   e. Conference cancelation policy (if activity is a conference)
   f. Conference registration refund policy (if fee is charged)
   g. Faculty names, credentials and affiliations (hospital or academic)
   h. Program schedule
   i. Registration form if applicable
   j. Logos must conform with TTUHSC established Guidelines and Communications and Marketing Policies

3. TTUHSC will not approve any marketing materials that state "credit has been applied for" or any similar language.

4. Marketing materials must not overemphasize extracurricular or social events beyond the education activity. Publicity should present the CME activity as the major incentive for participation. (Compliance with ACCME SCS 3.11)

5. Product promotion material or product specific advertising of any type is prohibited in or during CME activities. The ACCME provides very specific guidance on marketing and advertising within print, audio, video, live and enduring activities. TTUHSC Office of CME will provide to anyone developing printed marketing materials the ACCME Standards for Commercial Support 4.1, 4.2, 4.3, 4.4 and 4.5 which directs our actions in keeping inappropriate marketing and promotion out of CME activities.