



Philanthropic Support for Educational Events/Symposia from Corporations including the Pharmaceutical, Medical Device, & Life Sciences Industry

Policy and Procedures

Overview:

This policy and set of procedures applies specifically to corporate/commercial support from the pharmaceutical, medical device, and life science industry **as it pertains to all educational events and symposiums (CME and non-CME)** for the benefit of Children's faculty and staff, Children's patients and families, or the larger Longwood medical community. Both policy and procedures are meant to ensure compliance with internal policy and external regulations, specifically:

- The ***Policy on Philanthropic Activity***, approved by Children's Hospital Medical Center Board of Trustees (June 6, 1998) mandating that all fundraising activity on behalf of the Hospital be conducted by the Boston Children's Hospital Trust; including gifts from individuals, foundations, corporations, and organizations.
- The federal Sunshine Act requiring corporations in the pharmaceutical, medical devices, and life sciences industry annually to report to the Centers for Medicare and Medicaid Services information regarding payments, ownership, investment interests and other transfers of value to physicians and teaching hospitals.

Further, compliance with this policy ensures that health care providers associated with Children's are protected from any perception of conflicts of interest that might arise from their direct involvement in soliciting or receiving Industry Gifts.

Policy (CME and non-CME educational programs):

Philanthropic requests for corporate/commercial support from life science, pharmaceutical, medical device companies and corporate foundations (Industry) for professional educational events, such as lectures and symposia sponsored by Children's (Industry Gifts) are permissible provided that:

- Support is received from a non-sales division of the corporate/commercial supporter and must be a charitable donation made with philanthropic intent and not a payment for services;

- Corporate/commercial support is paid to the Boston Children's Hospital (through the Trust) and not to a Department, Division, Center or any individual;
- The support is reasonable and based on fair market value of the cost of the program and of the services provided.

Requirements:

- Decisions regarding the nature of the educational program, its content, speakers, etc., rest solely with Children's;
- There is no expectation or requirement that Children's or any member of Children's staff/faculty/Department/Division/Center purchase goods or services or make referrals;
- There is full disclosure, in advance and at the meeting, of the nature and extent of the corporate/commercial involvement in the event or program;
- All faculty disclose any relationship they may have with the corporate/commercial supporters;

Restrictions:

- Gifts bearing the corporate/commercial supporter's name or logo, such as pens and tote bags, will not be distributed;
- There is full disclosure, in advance and at the meeting, of the nature and extent of the corporate/commercial involvement in the event or program;
- Corporate/commercial representatives may be present at the conference, but may not engage in sales activity;
- Exhibit space is not allowed as part of the philanthropic gift or grant support for CME or non-CME events. Exhibit space must be arranged separately through the BCH CME Department;
- Educational materials that are solely for the benefit of event participants may be displayed, but only with the prior written approval of a Children's Vice President or Chief.
- Boston Children's Hospital cannot accept funding to underwrite the costs of participants' travel to an educational event, regardless of whether CME or non-CME.

Allowances:

- Corporate/Commercial support provides needed funding to support general conference costs such as conference space, refreshments/light meals, audio visual, speaker honorarium relevant to the educational programs. Corporate support will not be used for sole sponsorship of special dinners.
- Non-CME events may be supported by one or more corporate/commercial supporters; CME must have more than one corporate/commercial supporter.
- Boston Children's Hospital cannot accept funding to underwrite the costs of participants' travel to an educational event, CME or non-CME.

- Any third-party vendor that is contracted by Boston Children's Hospital to execute a CME or non-CME event, including the solicitation of corporate/commercial support, must follow all BCH policies and procedures. Plans for the solicitation of corporate/commercial support the Third-Party Vendor must be reviewed and approved by the Trust prior to solicitation.

Procedure for Solicitation of Support:

The Trust oversees all hospital philanthropic requests for Corporate/Commercial Support, consulting with the Office of the General Council as needed, and coordinating with the (CME Educational Program Office for those programs).

All requests by Children's faculty, staff, Departments, Divisions, or Centers for Corporate/commercial support must be coordinated by the Department, Division or Center and reviewed and approved by the Trust's Corporate Relations Team prior to solicitation. Individual faculty and staff are not authorized to solicit donation on behalf of Children's.

- The Department/Division/Center hosting the seminar will complete the *Trust Vendor (Pharma, Life Science, Medical Device Corporation) Solicitation form included as Attachment A*. The Solicitation Form must include a list of companies and contact information (Corporate/Commercial Support List) along with an explanation for compliance purposes as to why these corporate/commercial entities are being solicited (past support, current vendor, aligns to disease/health interest) The request must indicate any event details, sponsorship levels (if applicable), and logistical information on the event/summary.
- The Solicitation Form will be reviewed by the Senior Director, Corporate Relations or her/his designee. (Currently, Jane Hamel, jane.hamel@chtrust.org, or Laura Babey, laura.babey@chtrust.org)
- The Trust will approve or edit the Corporate/Commercial Support List and provide the Department/Division/Center hosting the seminar a draft Solicitation Letter outlining the appropriate language to use including the request, amount of funding sought, and summary of the project.
- The Solicitation Letter will state specifically that all checks be payable to Boston Children's Hospital and mailed to Senior Director, Corporate Relations, at Boston Children's Hospital Trust (401 Park Drive, Suite 602 East, Boston, MA 02215), Checks must reference the specific project in either the remittance advice or in a letter accompanying the check.
- The Solicitation Letter will be reviewed by the Department/Division/Center and finalized in collaboration with the Senior Director, Corporate Relations, or her/his designee
- If a Corporate/commercial supporter replies to a solicitation by directing the Department/Division/Center to an online grant application process, the Department/Division/Center should contact the Development Officer at the Trust for assistance (currently, Laura Babey, laura.babey@chtrust.org). The

Development Officer will respond within two business days to collect the materials necessary and complete the online grant application.

- In the event a grant/gift/sponsorship is secured and a letter of agreement is required, the designated officer at the Trust will facilitate its approval from Legal & Compliance and its execution by an authorized signer for Boston Children's Hospital.
- The Trust assumes all responsibility for processing, receipting, and acknowledging Industry sponsorships, and for ensuring that the funds are deposited into the appropriate philanthropic fund managed by the Department/Division Center.
- The Trust is responsible for setting appropriate donor benefits based on the level of the gift, and for ensuring their receipt by the Industry donor.

Special Procedures for CME Accredited Educational Programs:

It is the Chief's or Vice President's responsibility to ensure compliance with all relevant policies in conjunction with the CME Department at Boston Children's Hospital. The Trust will oversee all requests for corporate/commercial support for CME programs including, but not limited to, direct solicitations and online grant applications.

Please note all checks should be made out to Boston Children's Hospital and should be directed to Senior Director, Corporate Relations at Boston Children's Hospital Trust, 401 Park Drive, 6th floor East, Boston, MA 02215. The Trust will ensure these gifts are deposited promptly and directed to the appropriate fund supporting the seminar or symposium.