

Chapter 6 Education Activity Cycle

INITIATION AND APPROVAL

All educational activities to be administered by SIBCR as described in Chapter 1 must be approved by the VAPSHCS Education Council (EC). Please submit the Request for Review and Approval of Non-Profit Educational Activity form (available on the SIBCR website) to SIBCR. SIBCR will submit it to the EC for review. The EC will base its recommendations for proposed activities on applicable VA Education Manual policies pertaining to conflict of interest and appropriateness to VA's education and training missions as well as the definition of education and training established by PL 106-117, Section 204 (Title 38, §7362). The Council meets in person quarterly and will review proposals on an ad hoc basis by email throughout the quarter.

The activity may be a one-time event or an ongoing series. SIBCR will review the request, request additional information if necessary, and approve it before submitting it to the EC. The request should include an estimated budget for the program(s) with the most inclusive list of types of expenditures that may be made in support of the activity. In this way, once EC approval is received there will be no need to file an amendment for approval of types of expenditures that were not included in the initial budget.

If funds to support the activity must be solicited from outside sources (including individuals, corporations, or other organizations), such solicitations may not be made by VA employees in their official position. SIBCR will make the request. There is a template request letter on the website that is appropriate for most programs. Please provide the necessary details and submit a completed draft letter electronically to the Executive Director. The request letter will be reviewed and sent on SIBCR letterhead over the Executive Director or Assistant Director's signature.

If the template letter is not appropriate for a specific program or request, please provide details to SIBCR so that a letter tailored to the program can be sent.

For programs accredited either through VAPSHCS or the Employee Education System (EES), there are additional guidelines. If the sponsor requires a formal grant agreement, the agreement must meet the requirements of the accredited provider (VAPSHCS or EES).

Corporate sponsors will require formal agreements for educational grants, whether for CME or non-CME.

SIBCR works with both EES and VAPSHCS on accredited programs that have outside sponsors. Most corporate sponsors have agreed to follow certain guidelines for the support of educational programs that meet the standards required for accredited programs. These guidelines were published in 2002 as the "*PhRMA (Pharmaceutical Research and Manufacturers of America) Code on Interactions with Healthcare Professionals.*" Other relevant guidance can be found in the Federal Register dated December 3, 1997 (Volume 62, Number 232) page 64073-64100. The document is called "*Final Guidance on Industry-Supported Scientific and Educational Activities.*"

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In addition to these documents, both VISN 20 and VHA have published guidance on interactions with pharmaceutical sponsors. For VHA, it is the VHA Directive 2003-060, dated October 21, 2003, on "*Business Relationships between VHA Staff and Pharmaceutical Industry Representatives.*" The VA Northwest Network, VISN 20 has also executed a "*Vendor Gratuity Policy Memorandum*" (10N20-2004-003, January 23, 2004).

Again, no educational activity can be initiated until approval of the EC has been received.

POST AWARD

Funds received in support of educational programs usually have explicit restrictions on their use.

Educational grants and activities will be tracked individually by SIBCR and will have a designated fund number and name. Monthly financial reports will be provided to the responsible member or designee.

The EC will require an annual report on ongoing activities. For one-time events, the EC will notify the responsible member or designee for the necessary report. The financial data for the report will be provided by SIBCR.

Funds received in support of an accredited program often have additional restrictions. If some funds remain after the initial approved activity, these remaining funds cannot be used in support of other similar accredited programs unless it is allowed for in the grant agreement.

CLOSEOUT

As indicated above, educational grants are usually received with explicit instructions limiting expenditures to a particular program or activity. Therefore, funds remaining at the end of an activity may have to be returned to the sponsor or used only as allowed for education as in the original donation. If possible, SIBCR will include wording in all requests that will allow as broad usage as possible for educational activities.