



Global and Continuing Education

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Policy on Meals and Social Events for Continuing Medical Education Activities

Effective Date: April 2, 2012 Revised: June 3, 2014

I. POLICY

This policy is established in accordance with requirement 3.11 of the Accreditation Council for Continuing Medical Education (ACCME)'s *Standards for Commercial Support of Continuing Medical EducationSM*: *Standards to Ensure the Independence in CME Activities* (SCS) and Harvard Medical School (HMS) requirements. Any meals or social events provided in connection with a CME activity shall not compete for time or space or take precedence over the educational event. Activity tuition and/or departmental funds should be used to pay for all food and beverage expenses.

II. PROCEDURES

The following requirements apply for meals to be charged to CME activities:

Faculty Appreciation and Business Meals¹

Harvard Medical School's Global and Continuing Education (GCE) supports faculty dinners, either through activity tuition revenue or funding from the affiliated hospital or department. Faculty dinners are generally held in appreciation for faculty participation in a course or other form of CME activity. Additionally, faculty dinners constitute a legitimate business meal expense if course business is discussed during the dinner, which may take place immediately before, immediately after, or during a multi-day educational event.

If the expense will be posted against funds derived from activity tuition revenue, the spouse/travel companion of an out-of-town course speaker may be invited to a faculty appreciation dinner and the cost of the guest is covered by the business purpose (since it would not be "appreciative" to exclude the speaker's travel companion who is far from home). Spouses/companions of local faculty should not be invited to a meal, unless there is a specific business purpose for that person to attend. These expenses are subject to the same funding restrictions as faculty appreciation and business meals.

Business meals related to CME activities are intended for the faculty teaching a particular educational event. There has to be a specific business purpose for non-teaching faculty to participate in a meal. If other invited individuals are providing guidance or feedback, or are serving as advisers, the business purpose for their presence must be stated on the invoice for the meal.

Travel and incidental expenses (individual airfare, lodging, ground transportation, and meals other than described above) for any family member/travel companion are not allowed as a course expense under any circumstance.

¹ Harvard University defines business meals as meals taken with students, colleagues, or donors during which specific business discussions take place. Business meal expenses may be reimbursed based on reasonable actual costs as determined by the approver. Additionally, business-related meals taken with others may be reimbursed in the following circumstances:

- when, for confidentiality reasons, business must be conducted off University premises, or
- when dining with other employees on an out-of-town trip such as a conference, or
- when authorized by the department for reward, recognition, or other appropriate business purpose.

The use of alcohol for business entertainment purposes should be kept to a minimum. Employees should be aware that the purchase and use of alcohol places significant legal exposure on the University.

All invoices and reimbursement requests for faculty meals must be submitted to the HMS GCE office within thirty days of the expense date and must be supported by a list of attendees with their course affiliation, a business justification for the event, and a detailed table bill to enable the Finance Department to separate food from alcoholic beverages.

Activity Participants' Meals

Meals provided for activity participants during the course of a CME activity are allowed as long as they are modest in scale so as not to take precedence over the educational event. Additionally, they must be open to all participants of the CME activity. These meals may be paid for either through activity tuition revenue or with funding from the affiliated hospital or department.

The following requirements apply to social events held at CME activities:

Social events (e.g. receptions, cocktail hours, etc.) may be paid for using activity tuition or departmental funds as long as such events do not compete for time or space or take precedence over the educational event. They may not be paid for either through educational grants or promotional funds from commercial interests;

All invoices and reimbursement requests for social events must be submitted to the HMS GCE office within thirty days of the expense date and must be supported by a list of attendees with their activity affiliation (or for events with more than five (5) individuals, list the number of faculty and number of learners), a business justification for the event, and a detailed bill to enable the Finance Department to separate food from alcoholic beverages.

Policy Related to Meals and Social Events

- *Policy on Commercial Support for Continuing Medical Education Activities*