

TITLE OF POLICY:

EDUCATIONAL PROGRAM AND EVENT POLICY

1.0 PURPOSE

This policy establishes the requirements regarding the Boston VA Research Institute, Inc.'s (BVARI) support and administration of extramural sponsored educational programs and events provided to VA Boston Healthcare System (VABHS).

2.0 SCOPE

BVARI supports a broad array of educational services to VA Boston Healthcare System (VABHS) faculty and stakeholders in the support of programs and events. Educational projects focus primarily on the issues related to veteran health-related services as well as providing a commitment to professional studies and workforce development at VABHS.

3.0 POLICY

Active VABHS Principal Investigators who would like to request external funds to support an educational event shall submit an **Education Event Request Form** in advance to BVARI. VA employees are prohibited from soliciting external funding for educational programs and events directly in accordance with federal regulations.

Educational event expenditures on BVARI-administered education awards must comply with the following requirements:

- Indirect cost rate: An indirect cost rate of 15% will be applied to all educational event expenditures.
- Food/Meals:
 - At a single-day educational event, it may be considered reasonable to serve light refreshments if the educational program is the purpose of the event.
 - For a multi-day event, daily meals should be paid for by attendees through a registration fee. One meal at a reasonable cost may be supported by the BVARI.
 - All meals will be reimbursed based on [U.S. General Services Administration \(GSA\) per diem rates](#).
 - A disclosure statement on the invitation, registration, and agenda must state whether refreshments and/or a meal is provided and must be distributed to all attendees. This statement is required to support BVARI's obligation for full disclosure of availability of meals to all participants at an educational event.
- Alcohol: Alcohol is not allowed under any circumstance.
- Hotel Services: It is not permissible to use BVARI funds to pay for hotel services not included within the overnight accommodations such as spa, fitness center, or movie rentals.
- Gifts/Promotional Items:
 - Incidental promotional items of nominal value (e.g., pens and notepads) may be paid for by BVARI funds and distributed at an educational event.

- Inexpensive gifts or mementos of little intrinsic value may be provided to speakers, guests, or attendees in accordance with VA regulations.
- Honoraria
 - An honorarium is permitted to be paid to VA employees, with some restrictions. Please see VA regulations pertaining to honoraria for details.
 - The amount of an honorarium should be consistent with amounts provided at similar educational events at other local academic institutions. BVARI may not be perceived as a pass-through for industry supporters to fund the honoraria of presenters.
 - The source of payment for honoraria must be included in the **Education Event Request Form**.

4.0 DEFINITIONS

Educational Programs and Events: Educational activities that have been approved by the VABHS Education Committee in accordance with criteria established in 38 U.S.C. 7362 (6) where reasonable costs for supporting the program or event receive prior approval. Types of activities may include patient-related and employee-related, including VABHS employees taking part in residency and other training programs in the health care profession. BVARI may collaborate with VABHS Employee Education System (EES) to support approved education and training activities for VABHS.

5.0 RESPONSIBLE PARTIES

5.1 *BVARI Board of Directors*: The Board of Directors is responsible for the overall policy.

5.2 *BVARI CEO*: The CEO is responsible for developing and administering a business process that provides optimal internal controls.

5.3 *BVARI Sponsored Programs Administration (SPA)*: SPA is responsible for reviewing educational event requests, obtaining required approvals, management of allowable expenditures on educational BVARI-administered accounts, and monitoring remaining balances.

5.4 *BVARI Operations*: Operations is responsible for providing logistical support for approved educational events as needed.

6.0 PROCEDURES

Educational programs and events require advance approval by the VA Associate Chief of Staff for Education. A completed **Education Event Request Form** and required supporting documentation must be submitted to BVARI in advance of program or event. Approval may be granted based on compliance with VA policies pertaining to conflict of interest, applicability to VA's educational mission, and conformance to the definition of education and training established by PL 106-117, Section 204 (Title 38, Section 7362).

7.0 RELATED DOCUMENTS

- BVARI Conflict of Interest Disclosure (*for non-VA employees*)
- Education Event Request Form
- Donation Policy
- Indirect Cost Rate Policy

- VHA Handbooks 1004.07, 1400.03, and 1400.08
- Department of Veterans Affairs Financial Policy on Awards, Ceremonies, Food or Refreshments, Gifts or Mementos

8.0 REVISION HISTORY

Revision Letter	Author	Revision Date	Description of Changes
A	Nancy Watterson-Diorio	11/06/2013	Original policy
B	Caitlin Crowley / Denise Moody	8/18/2021	<ul style="list-style-type: none"> - Added expenditure requirements - Removed detailed procedures in lieu of updated Education Event Request Form - Added Responsible Parties section - Updated all Resources
C	Caitlin Crowley / Denise Moody	5/4/2022	<ul style="list-style-type: none"> - Added requirement to use GSA per diem rates for meal costs