



THE VISION CARE
INSTITUTE™, LLC
a Johnson & Johnson company

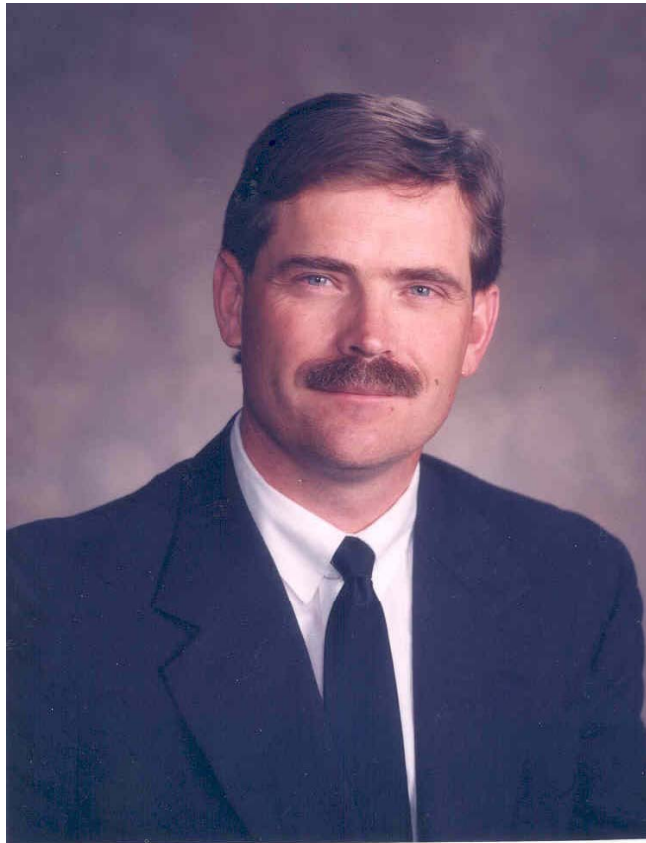
Johnson & Johnson Policy

on

Educational Grants

and

Promotional Sponsorships



J. Pat Cummings, OD, FAAO

Vice President

**Professional Group & Customer
Development**

Educational Grants

Are funded by:



**THE VISION CARE
INSTITUTE™, LLC**

a *Johnson+Johnson* company

- ⊕ Continuing Education
- ⊕ Non-CE Educational
- ⊕ Fellowships / Scholarships
- ⊕ Educational Materials



Promotional Sponsorships

Are provided by:



DIVISION OF
Johnson & Johnson
Vision Care, Inc.



- ⊕ Exhibitor / booth fees
- ⊕ Promotional speaker requests
- ⊕ Corporate sponsorship packages
- ⊕ Funding for receptions, luncheons, dinners
- ⊕ Funding for advertising in event brochures

Key Distinctions



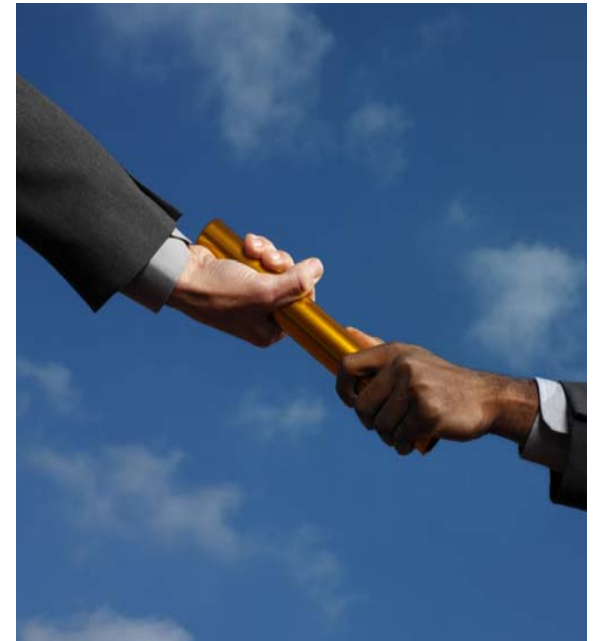
- ⊕ Funding for independent, company-sponsored educational activities are primarily intended to benefit customers & patients through dissemination of information that contributes to or advances the practice of medicine.
- ⊕ Promotional Sponsorships are fee-for-service arrangements, where Vistakon is the primary, direct, and intended beneficiary

Key Distinctions

NOTE: Sales and Marketing representatives must not be involved in the educational grant process.

If a sales representative is approached regarding an educational grant, he/she must immediately hand off the request to The Vision Care Institute[™], LLC, and will no longer be involved.

Sales and Marketing representatives will not be involved in the decision-making process or be made aware of the status of the grant request.



Educational Grants

- ⊕ Educational grants are **RESTRICTED** in the sense that the grant must be used to provide the education detailed in the application for support. The funds cannot be applied to the requestor's general budget.
- ⊕ Educational grants are **UNRESTRICTED** in the sense that the recipient has full control over how to apply the grant to the educational event.



Educational Grants

Key Considerations:

- ⊕ Grant Recipient – Recipients must be the CE/CME provider, not an individual customer or speaker
- ⊕ Nature of the Activity – Educational Grants are for the purpose of supporting bona fide educational activities





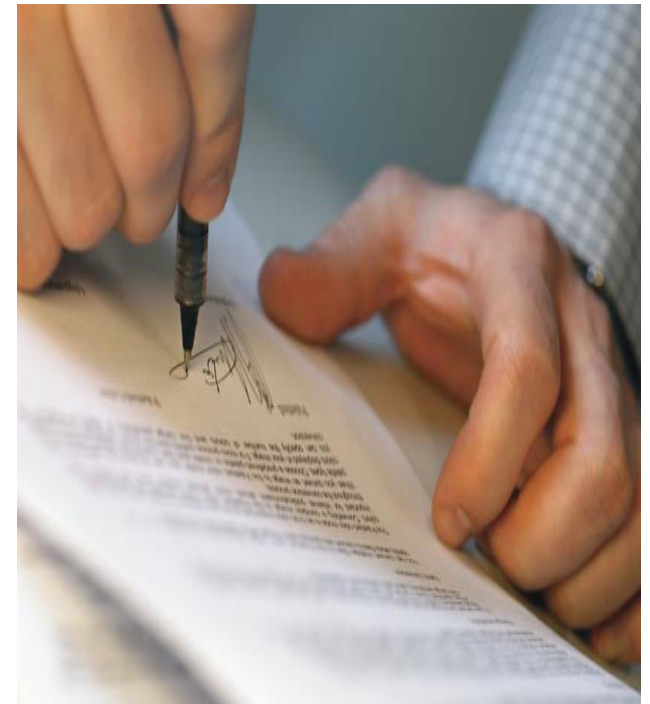
Educational Grant Process

⊕ Non-Promotional Content Free of The Vision Care Institute[™], LLC's Influence – Although our company may limit its support for educational programs to topics of interest to the company, the grant recipient must maintain control over speaker selection and the content of the program, and commit to provide a balanced presentation of the information. These programs are educational, not promotional vehicles.



Educational Grant Process

- ⊕ Disclosures – TVCI’s support for the program and any significant financial relationships with speakers must be disclosed to the audience.
- ⊕ Use of Funds – CE providers may use the funds in many ways to include securing meeting space, paying speakers, or securing educational credit.
- ⊕ Written Agreement – All grants must have a written agreement between TVCI and the grant recipient that addresses all policy, FDA and COPE / ACCME standards.



Educational Grant Process

⊕ Poster Board Presentations – Travel and expenses may not be paid to customers for presenting poster board or free papers at an educational program.

Attendees – TVCI may not be primarily responsible for marketing educational programs. The company may not pay attendees in any form for their attendance or travel expenses for attending programs.

⊕ Social Events – TVCI may sponsor modest social events at the program as long as the events do not interfere or distract from the program.



Educational Grant Process

Educational grant requests must be initiated by the grant requestor, and all paperwork and funding must be completed before commencement of the event or program.

Request Procedure:

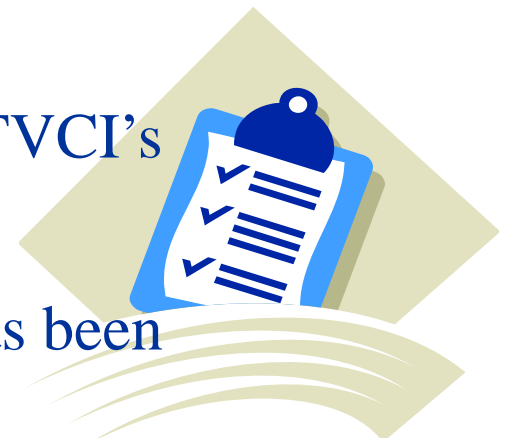
- ⊕ Grant Administrator is contacted via email or phone.
- ⊕ Grant Administrator will send the educational grant application and instructions to the requestor.
- ⊕ Requestor will submit the application with a formal letter of request, and any additional supporting documentation (agenda, budget, brochure, etc.)



Educational Grant Process

Review of the educational grant application includes the following:

- ⊕ Does the request comply with all policy, FDA and COPE / ACCME standards?
- ⊕ Does the event or program appear to be a valid educational activity?
- ⊕ Is the amount requested reasonable in light of the activities to be performed, and does it appear to be reasonable when compared to previous funding amounts?
- ⊕ Is the event non-promotional and free from TVCI's influence?
- ⊕ Have all post-event accounting for past grants been received?



Educational Grant Process

- ⊕ On approval of an educational grant application, the requestor will be informed of the decision.
- ⊕ A “Letter of Agreement” will be drafted and two originals sent to the requestor for signature. On return of one original to the Grant Administrator, the grant will be funded.

A Final Accounting must be provided to TVCI within 30 days of the event or program end date. Failure to submit this documentation will place future grants to the recipient in jeopardy.

No new requests will be reviewed until all requirements have been met for any outstanding grant documentation.

