EXPLANATION OF PURPOSE

The University of Utah School of Medicine's CME Office (UUCME) follows all Accreditation Criteria and Standards of Commercial Support set forth by Accreditation Council for Continuing Medical Education (ACCME). Those criteria and standards may be found on ACCME’s website (accme.org). This policy explains how UUCME applies those criteria and standards. This UUCME Policy clarifies the following topics:

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Located in separate documents but considered part of UUCME policies:

- See UUCME Mission Statement for mission, purpose, and expected results.
- See UUCME Disclosure Policy for process application of disclosure standards.
- See UUCME Fees for the current fee structure.
- See UUCME Expectation for roles and responsibilities.
- See UUCME Three Strikes Policy.

UUCME’s concept of operations is a decentralized function. UUCME office staff oversee the accreditation process and ensure that all activities meet the Accreditation Council for Continuing Medical Education (ACCME) requirements. Activity planning, preparation, and documentation is performed by the departments with support from the UUCME office staff. See UUCME Expectations for more details.

**HONORARIA AND OUT OF POCKET EXPENSE FOR PLANNERS, TEACHERS AND AUTHORS**

UUCME has established this policy to govern honoraria. The following criteria will be used for establishing honoraria fees:

- Tasks required and time to complete
  - Number of talks to give
  - Number of hours speaking
- Local speaker vs. speaker out of the local area where travel is required
- Subspecialty of Physician
- Market Rates

Based on the criteria listed above, an honorarium can be set for different types of work. UUCME will track all CME honoraria payments to faculty in the CME activity electronic file folder.

UUCME is accountable for establishing the criteria upon which CME honoraria amounts are determined for planners, faculty/speaker, and authors participating in CME activities. The establishment of honoraria guidelines assures fair treatment among departments. UUCME delegates the responsibility of determining the CME honoraria to the departments based upon their using the established criteria noted previously in this policy.

Any honorarium equaling or in excess of $3,000 will require the review and approval of the Associate Dean, CME. The UUCME Honorarium Review Form is used for this purpose.

Out of pocket expenses for planners, teachers and authors will follow the same criteria format as honoraria. Reasonable reimbursement, when requested, for slide printing, handouts, and other educational materials to support the CME activity are authorized. This determination is made by the departments conducting the CME activity.

**Best practice tips: When in doubt, contact UUCME for help. If you know you will pay $3000 or more in an honorarium, let UUCME know as soon as you do.**

**USE OF COMMERCIAL SUPPORT FUNDING**

The planning process requires planning committees to incorporate independence from commercial interest in the planning process. The management of commercial support, the separation of promotion from education, and the promotion of improvement in healthcare and not the proprietary interests of a commercial interest are all part of the CME activity planning process.
All commercial support funding for a UUCME accredited activity must be given with the knowledge of the UUCME office. This is accomplished by documenting the support with a signed Letter of Agreement between the commercial support company, the University department, and UUCME. Letters of Agreement must be signed by the company, the CME office and a department representative prior to the activity taking place. The Letter of Agreement must specify the commercial interest that is the source of the support. It must also state the terms, conditions, and purposes of the commercial support.

Commercial support includes educational grants and in-kind donations. The support will be acknowledged in the course promotional material. There cannot be any conditions placed on receiving educational grants. Receiving exhibit space in return for providing an educational grant is placing a condition on the grant and that is not allowed (see next section for more on exhibitor space).

No funds will be provided to support the CME activity without the knowledge of the UUCME office. All payments must be paid directly by the UUCME office or The University of Utah School of Medicine Departments. No payments can be made directly by a commercial support company in support of the CME activity. Commercial support companies cannot arrange and pay for meals, pay the course director, planning committee, teachers, authors or anyone else in control of content, joint providers, or any others involved with the supported activity.

**Best practice tips:** As soon as your activity is considering commercial support (education grants or in-kind donations), contact UUCME so we can advise you based on the situation. Plan ahead; it can take some time to get the agreements required in place.

UUCME provides a Letter of Agreement on our website that may be used for documenting commercial support. This format is optional; commercial interests may prefer to use their own agreement forms. Agreements are required.

**Acknowledgement of Commercial Support**

The commercial supporter’s logo cannot be used to acknowledge support. The acknowledgement needs to specifically tell the learner that the commercial supporter gave support for the activity. This could be a grant or in-kind support (providing equipment, donating supplies, etc.). The acknowledgement of commercial support cannot contain any product promotion. The acknowledgement statement may appear something like this: “We thank the following companies for their grant support of this educational activity.” Then list the names of the companies.

**Best practice tips:** When in doubt, contact UUCME for help. Send your draft acknowledgement of commercial support page or document to UUCME prior to printing for a double-check.

**Exhibitor Space**

Exhibitors are not considered commercial supporters. An exhibitor is paying for space to exhibit their product or services outside the educational space. A commercial supporter is providing an educational grant to support the CME activity. An exhibitor contract is not required, but is recommended as a good business practice. A summary of the total exhibitor fees received is reported to the UUCME office as part of the post course financial summary.

Receiving exhibit space in return for providing an educational grant is placing a condition on the grant and is not allowed. Selling exhibit space to commercial interests is considered to be a business transaction. Income from selling exhibit space is not considered to be commercial support as defined by the Accreditation Council for
Continuing Medical Education (ACCME). Exhibit space is purchased for promotional purposes. Grants are to support the provision of education. The two must be kept separate and distinct.

For live, face-to-face CME activities, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CME activity. Exhibitor activities are promotional in nature and must be kept entirely separate from all education activities. Representatives of Commercial Interests are not allowed to engage in sales or promotional activities while in the educational space or place of the CME activity. Exhibits and promotional activities are confined to the exhibit space that is separate and outside of the educational space.

Best practice tip: Use the exhibitor Letter of Agreement found of our website to set up your Exhibitor contracts. This is not required, but in your best interest.

If you choose to recognize exhibitors they must be acknowledged separately from commercial supporters (grants). In the syllabus or other promotional material, if the exhibitors are listed they must be listed as exhibitors. The acknowledgement statement may appear something like this: “The following companies are exhibitors for this educational activity.” Then list the names of the companies. The commercial supporters providing grants are listed separately as commercial support.

CHARGES FOR EXHIBITOR SPACE

This is considered a separate business transaction between the department and the exhibiting company. However, the charge for space should be based on a rational system that treats everyone the same. Whether to charge an exhibitor fee or not is left to the discretion of the department. The charge is only for the space given to the exhibitor in the exhibit hall and is not a substitute for a CME educational grant. Two exhibitors placed next to each other with the same amount of space should have paid the same amount. Someone with more space or a better location would probably pay more, unless it is really not of more value.

Exhibit space is purchased for promotional purposes and must be kept separate from the education. Therefore, educational grants should be kept completely separate and distinct from the purchase of exhibit space.

PRESENTERS FUNDED BY COMMERCIAL INTERESTS

UUCME policy is that any presenter, moderator, author or anyone with control over the content of a CME activity cannot be paid directly by a commercial interest; or have the commercial interest directly pay for travel, lodging, meals, etc. on their behalf to participate in the activity.

This policy also applies to the following scenario: If a presenter is paid by a commercial interest to come to local area for another purpose, the presenter, while they are in the area, cannot be invited to speak at a School of Medicine accredited CME activity. The rationale is that the presenter has been paid to come to the area by a commercial interest.

EMPLOYEES OF COMMERCIAL INTERESTS

UUCME policy matches ACCME criteria that any employee of a commercial interest cannot contribute to the content of a CME activity except in these three special cases:

1. Content is completely not related from any of the products or services that the commercial interest produces across all business lines
2. Content is about the basic science only (includes pre-clinical research, drug discovery)
3. Be a technician focused on teaching safe & proper use of medical devices. This includes how to safely operate and adjust the device, but the individual cannot make any comparisons with any competing products or make clinical recommendations concerning any products in the parent company’s business lines.

If an apparent employee of a commercial interest (as discovered during disclosure of relevant financial relationships) is desired as a speaker/planner of a CME activity, UUCME staff will work with directors/coordinators to ascertain details of the relationship. If UUCME determines the person is an employee of a commercial interest, the activity director will be educated on the policy and issues surrounding this topic. The director as the content expert and UUCME will determine if the three special cases above apply. Additional options will be considered that include not using the person in that role or not providing CME credit for that portion. If the special cases apply, additional safeguard strategies will be implemented to ensure independence, which include review of the research, evaluation and changing presentation materials, ensuring balance in content, keeping content to the basic science or discovery/research process, and/or monitoring and interrupting the content while it’s on-going. If a special case applies and the employee is allowed to contribute to the content, learners will be alerted via the disclosure summary process that includes role, type of relationship, and commercial interest name. If the employee of a commercial interest is to be on the planning committee of the CME activity, the director, employee, and UUCME must meet to discuss the issue and the options available to ensure independence.

ROLE OF THE COMMERCIAL SUPPORTER’S REPRESENTATIVES

Representatives of commercial supporters must wear name badges (a company badge, conference badge, or University Pharmacy ‘MSR’ issued badge) when in the educational space of the activity. The representative must sit in the back of the room and keep a low profile. The name badge will not have the company logo or product name on the badge. The company name is allowable. The name badge is looked upon as a means of disclosure.

Promotional materials need to be restricted from the educational space prior to, during, and immediately following the educational activity. Representatives may not engage in sales activities (e.g., no product displays, detailing, or promotion) while in the educational space where the activity takes place. Promotion and education must be kept separate. Promotional activities are permissible in the exhibitor area.

Representatives may observe, but not participate in the presentations of the activity. Representatives may not participate in the question and answer portion of the activity by asking questions, or influencing, or suggesting, certain questions be asked by the participants.

CREDIT APPROVAL AND TRACKING

Documentation of AMA PRA Category 1 Credit(s)™ for continuing medical education is one of the primary functions of UUCME. UUCME office follows the ACCME accreditation requirements and policies to ensure the integrity and effectiveness of the AMA PRA Category 1 Credit(s)™ system. Activities are designated for AMA PRA Category 1 Credit(s)™ through a formal planning process, which satisfies all accreditation criteria. The activity content is independent, valid and free of commercial bias. The credit approval process complies with the AMA PRA Category 1 Credit(s)™ requirements and ACCME policies. Credits for activities are calculated per the AMA publication, ‘The Physician’s Recognition Award and Credit System 2010 Revision’.

The accurate keeping of records is essential in certifying the activity completion by licensed physicians. AMA PRA Category 1 Credit(s)™ is awarded to allopathic (MD), osteopathic (DO) or an equivalent medical degree from another country. The credits are tracked by UUCME for a minimum of six years using an electronic database called ‘CME Tracker’.
Credits are entered and tracked for each type of learning format. A record of all course registrants is maintained in the ‘CME Tracker’ database.

Anyone can obtain a copy of their credit transcript by following the directions below:
- Go to the CME homepage: http://medicine.utah.edu/cme/
- Click on the green rectangular box entitled Print Your CME Transcripts
- When prompted enter the following:
  - Enter your e-mail address: (university email address)
  - Enter your password: eight digit university ID number
  - Select the beginning and end date of the transcript
  - Sign-in

Best practice tip: Provide your learners with the “claim your credit” or “4 ways to call-in” instructions so they may claim their credit during the activity.

MOC PART 2 CREDITS
ABMS MOC part 2 credit (Maintenance of Certification Lifelong Learning and Self-Assessment credits) may also be handled through UUCME. UUCME will keep records of planning and implementation of any requirements. UUCME may add MOC part 2 into CME Tracker for learner ease. UUCME may also require and provide a MOC statement to include on publicity, flyers, etc. for learners once an activity has been approved to provide MOC part 2 credits.

ACCREDITATION STATEMENT AND OTHER CME STATEMENTS
The ACCME accreditation statement must be on all CME activity materials and brochures except perhaps the initial “Save the Date” announcement if only the date, name and location are listed. It is highly recommended that the ACCME logo be placed adjacent to the accreditation statement as it draws attention to the statement. The accreditation statement must appear on the following: syllabus, brochure, CME information sheet, etc. UUCME will provide the activity Director and Coordinator with the appropriate statements for their particular activity.

Best practice tip: UUCME will provide you with the exact statements to include and suggestions for how to distribute to your learners. Copy & paste what UUCME will provide. Ask UUCME if you have any questions about what to give learners when.

The standard locations for the ACCME accreditation statement and ACCME logo are:
- FOR RSSS, the ACCME accreditation statement and ACCME logo appear on each e-mail flyer, along with title of the presentation, name of the presenter, location of the RSS, the AMA Credit Statement (designating credit), the disclosure for everyone in control of content, the acknowledgement of commercial support (when applicable) and the University of Utah Non-Discrimination/Disability Statement.

- FOR COURSES, the ACCME accreditation statement appears on the “Save the Date” card if the announcement contains more than the title, location and date and on the publicity piece that invites registration (typically the brochure) along with the AMA Credit Statement (designating credit), and the University of Utah Non-Discrimination/Disability statement; and these statements also appear on the following materials handed out on the day of the activity: syllabus, CME information sheet, reference guide, etc. The accreditation statement and other information may also appear on the course website, syllabus or other materials.
FOR ENDURING MATERIALS (printed or internet) and PERFORMANCE IMPROVEMENT, or Journal CME the ACCME accreditation statement appears up front on the first page/screen the learner sees, along with all the required disclosure information, the AMA Credit Statement (designating credit), and the University of Utah Non-Discrimination/Disability Statement.

AMA CREDIT STATEMENT
Include the AMA PRA Category 1 Credit(s)™ Statement in any activity materials that reference CME, with the exception of “Save the Date” or similar notices.

A “Save the Date” announcement (such as a card mailer with limited space) may indicate that AMA PRA Category 1 Credit(s)™ will be provided without stating an exact amount, but only if The University of Utah School of Medicine has already certified the activity for AMA PRA Category 1 Credit(s)™. This announcement may read, “This activity has been approved for AMA PRA Category 1 Credit(s)™.” AMA PRA Category 1 Credit(s)™ is a trademark of the American Medical Association. Accredited providers are required to use “AMA PRA Category 1 Credit(s)™” in the AMA credit statement (designating credit). Please notice that in the AMA credit Statement the AMA trademark is italicized.

AMA CREDIT STATEMENT: The University of Utah School of Medicine designates this <insert learning format> activity for a maximum of (number of credits) AMA PRA Category 1 Credit(s)™. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

Any announcement, if it references the maximum number of credits for which the provider has designated the activity, must include the complete credit designation statement exactly as it is stated above with the learning format and number of credits inserted.

Providers may never publish or announce that “AMA PRA Category 1 Credit(s)™ has been applied for” or any similar wording. Activities cannot be retroactively designated for AMA PRA Category 1 Credit(s)™.

PRIVACY STATEMENT
The Continuing Medical Education Office abides by The University of Utah Privacy Statement. The Privacy Statement link is located on the bottom of each CME web page per the University web format. The UUCME office applies this same Privacy Statement to other forms of CME media. Pertaining to learner contact information, “We will not intentionally sell, share, or distribute your personal information to third parties, except as required by law or university policy”.

NON-DISCRIMINATION AND DISABILITY ACCOMMODATION STATEMENT
This statement must be included on all University of Utah materials. UUCME will provide the statement for use.

ADDITIONAL ACCREDITING BODIES
UUCME will support efforts to work inter-professionally and with other credit systems, including nursing contact hours, social work, speech pathology, pharmacy. At the University of Utah, UUCME is a separate office from other professions. However, we consider ourselves collaborative colleagues and share process and/or documentation while meeting our individual requirements, to the greatest extent possible. UUCME is often able to use the nursing planning application or share our Education Plan for use in completing their application, for example. We recommend when setting up a planning meeting with us to indicate which other credits you may want so we can include those representatives in our planning meeting discussion and collaborate throughout.
Best practice tip: Contact UUCME and other bodies early to see how we can reduce possible duplicate effort.

**RECORD RETENTION**
UUCME follows the ACCME policy pertaining to ‘Records Retention’. Please reference the ACCME Policy on Records Retention. A synopsis is provided here. UUCME will maintain a mechanism to record and be able to verify participation for six years from the date of the CME activity. Activity files/records for CME activity planning and presentation will be maintained for the current accreditation term or the last twelve months, whichever is longer.

Best practice tip: Retain all your CME activity documents for at least six years. Contact UUCME before disposing of any CME-related records.

**CME ADVISORY COMMITTEE**
The CME Advisory Committee is a multidisciplinary board chaired by the Associate Dean responsible for the Continuing Medical Education program. The CME Advisory Committee does not control content of CME activities. Membership of the advisory committee consists of representation from the physician faculty, quality and patient safety, legal, medical library, pharmacy and therapeutics, risk management, course directors and coordinators, etc. The majority of membership comes from the physician faculty.

The committee meets one to two times per year and its primary purpose is to provide a strategic direction for the program and assist in facilitating the achievement of the delineated mission and expected results of the overall CME program. The committee fosters the lifelong learning of physicians, helps grow the program and ensures quality continuing medical education activities based upon independent and valid information that is free of commercial bias. Minutes of each CME Advisory Committee will be maintained and copies sent to each member. Assignments and tasks will be tracked in order to report action at subsequent meetings.

**ACTIVITY EVALUATION**
For RSSs the evaluation of each RSS is accomplished annually at the end of the academic year. In early summer of each year the CME office will send the RSS coordinator a survey link to distribute to all the learners. Once the CME office compiles the survey results, they will be sent to the RSS Director and Coordinator along with the Annual RSS Review that asks about changes in learners, improvements implemented, etc. This review serves as the renewal of the RSS for the upcoming year. For series that have been on-going for several years, UUCME may request a short in-person meeting to update the series.

For live courses each activity has an evaluation that addresses as a minimum the suggested improvements and the detection of commercial bias. In addition UUCME uses a commitment to change tool to assess changes in learner competence or performance. Using this information the course director is asked to complete the End of Course Review analyzing changes in learners, improvements, and barriers.

For Enduring Material and Performance Improvement similar processes are followed as described above for RSSs and live courses. Enduring materials may have a post activity assessment.
Additional creative or innovating evaluation methods are encouraged! If you have an idea for how to evaluate your activity, we’d love to discuss that with at your planning meeting. If you have results showing that your activity contributed to improvements in performance or patient outcomes, please also send that our way any time.

**Best practice tip:** Evaluation should not only be a survey format. Think creatively about way you can measure your activities effectiveness at producing the changes you want to see. Work with UUCME to help develop and document those ideas.

**EDUCATIONAL OPERATIONS**

Educational design encompasses the educational needs that underlie the professional practice gaps of the activity’s learners. To help the activity director, coordinator and planners navigate the CME language and requirements UUCME offers to meet and discuss the activity plans. This discussion is guided by the use of the UUCME Planning Meeting Agenda. The UUCME Planning Meeting Agenda reviews the problems the activity is addressing, their root causes, what change(s) the learners will make, the educational format, the desirable physician competencies addressed, and how the course director will know if the activity has been successful in producing change. UUCME staff will lead the discussion and based upon the results UUCME will prepare the Education Plan for the activity Director’s review and edit. The activity is approved by UUCME.

**Best practice tip:** Schedule your UUCME Planning Meeting early in your activity development process.

A planning committee is the primary mechanism in which activities are planned. This committee must be free of commercial bias and independent in content formulation and review. The course content must be valid and free of bias. A planning committee is formed for each activity where needs are assessed, the curriculum defined, and methods of delivery determined. The content and venue should reflect the needs of the target audience and the anticipated outcomes or expected results.

**DIRECTLY AND JOINTLY PROVIDED**

All activities must meet identical compliance requirements to be CME-certified, though there are some administrative and cost distinctions. Directly provided activities means they are designed and conducted by a University of Utah department unit, whereas Jointly provided activities are designed and conducted in association with one or more non-accredited organizations outside the University of Utah.

For all activities, the Director or Co-Director should hold a University of Utah faculty appointment. This ensures that the University of Utah School of Medicine is positioned to be an honest broker for maintaining content validity. In instances of joint providership, this policy may be adapted or waived, at the discretion of UUCME. These decisions will be made on a case-by-case basis and will consider University of Utah faculty/staff involvement, previous history with the joint provider, and alignment with UUCME mission and strategic goals.

When two or more ACCME-accredited organizations work together, one takes responsibility for the activity and is named in the direct providership statement. If UUCME is taking the responsibility for the activity (providing the CME credit, tracking credit, disclosures, etc.), the UUCME jointly provided fee may still apply (see UUCME fees).

**COMPLAINTS**
Complaints may be received by the ACCME regarding The University of Utah School of Medicine Continuing Medical Education Office relating to the implementation of the ACCME accreditation requirements and policies. UUCME will be accountable for responding to the complaint received by the ACCME. UUCME accountability for the complaint is limited to twelve months from the date of the activity or in the case of a series, twelve months from the date of the activity which is in question. Documentation of such a complaint is treated as confidential.

RSS FLYERS
RSSs typically use an electronic flyer announcing each session that lists:
1. the name of the RSS,
2. location,
3. date and time,
4. title of presentation,
5. presenter name(s),
6. disclosure of financial relationships (presenter and everyone in control of content including planners or that there is no relationship to disclose),
7. acknowledgement of any commercial support received,
8. ACCME accreditation statement and logo,
9. AMA credit statement, and

Purpose or objectives for the session are encouraged as is the announcement of the upcoming RSS (title, presenter, short description, etc).

The purpose of the flyer is to ensure that properly documented disclosure, ACCME accreditation statement and other key accreditation information is consistently being made known to learners prior to the start of the RSS session. UUCME will provide a template.

Best practice tips: Contact UUCME before making any changes to your flyer template or process so that we can help guide you to be sure all required elements are present. Use a flyer template so sessions have the same format session-to-session. This will help ensure all required elements are there, but also quickly flag your learners to your series and what the flyer is about.

UNIVERSITY OF UTAH NAME
University of Utah Departments using other accrediting organizations for physician 
AMAPRA Category 1 Credit(s)TM courses will not be allowed to use the University of Utah name in the course promotional literature or in any other manner. Only physician AMAPRA Category 1 Credit(s)TM accredited courses that are certified by the University of Utah School of Medicine will be authorized to use The University of Utah name. This will ensure the integrity of the University’s name and allow its use with University sanctioned CME certified courses only. Faculty presenting at a course not certified by the University of Utah School of Medicine can be identified as a University of Utah faculty member, but the course cannot be portrayed, or mislead the learner to think that the University of Utah is sponsoring or certifying the course for AMAPRA Category 1 Credit(s)TM.