

Title: *Continuing Medical Education (CME) for Physicians*
The Banner Continuing Interprofessional Education Committee

I. Purpose:

The purpose of the Continuing Medical Education policy is to 1) describe the guiding principles of Continuing Medical Education (CME) operations within Banner Health, 2) identify the regulatory standards, internal policies and accreditation requirements that govern continuing medical education and 3) define the scope of responsibilities of the Continuing Interprofessional Education Committee (CIPE).

Banner Health strives to make health care easier so life can be better. The Mission of Banner Health's Continuing Medical Education (CME) Program is to provide medical professionals with educational opportunities which will foster ongoing learning, inspire the pursuit of excellence and prepare physicians to be leaders of health care innovation and change. Fulfilling this purpose will: 1) result in continual improvement of practice and 2) promote confidence in the delivery of optimal, reliable and accessible health care.

The goal of the Banner Health CME Program is to promote excellent patient care through education for health care providers. Thus, physicians and other healthcare professionals will acquire knowledge to foster changes in their practices based on the information provided at Banner CME activities. Measures considered to evaluate effectiveness will include measurable progress on clinical initiatives, implementation of practice improvements, and improved patient experiences and clinical outcomes.

II. Policy:

- A. Banner Health is accredited to provide physician education by the Accreditation Council for Continuing Medical Education (ACCME). Banner Health adheres to accreditation requirements and standards of the ACCME and the American Medical Association Physicians Recognition Award (AMA-PRA) credit system. The CME program supports the mission and goals of Banner Health, which are based on providing excellent patient care through continual quality improvement.
 - 1. The CME program will be evaluated annually to assess whether it is accomplishing its Mission.
 - 2. An emphasis will be placed on establishing communication links with other Banner practice improvement activities or groups, i.e., the Clinical Consensus Groups (CCG).
- B. There will be a Banner CME Office reporting to the Sr. Director, Simulation, CME and Patient Education, with system wide oversight of the Banner CME program, including the responsibilities specifically set forth in this policy.
- C. There will be a Banner Continuing Interprofessional Education (CIPE) Committee, comprised of representatives across the system, including physicians and other disciplines. Banner Health has authorized the CIPE Committee and Chairmen to designate *AMA PRA Category 1 Credit*[™] for educational activities. The Committee and the CME Office jointly oversee physician CME. Meeting times and constituency of the membership are determined by CME leadership.

Pharmacy Education – The CIPE Committee and the Pharmacy Education Administrators collaborate to support continuing education for pharmacists and pharmacy technicians and to foster interprofessional communication. To that end, the following items were agreed upon:

1. A Continuing Pharmacy Education (CPE) Subcommittee will be established to review pharmacy credit and ensure compliance with the Accreditation Council for Pharmacy Education (ACPE) requirements. Representatives from the CME Office will be designated to participate. (See *Education for Pharmacists and Pharmacy Technicians* policy)
2. The CME Office will provide limited administrative support, as approved by the manager of the CME Office.

D. Continuing Medical Education activities sponsored by Banner Health for *AMA/PRA Category 1 Credit™* must be planned and implemented in accordance with the ACCME accreditation standards and the *AMA-PRA Requirements for Accredited Providers*. Category 1 Credit is for physicians. Although other healthcare providers may benefit, the education clearly must be planned to address the educational needs of physicians. Physician involvement in the planning process is required. Banner-certified CME activities will comply with the following:

1. AMA Definition of CME: *CME consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public or the profession. The content of CME is the body of knowledge and skills generally recognized and accepted by the profession as within the basic medical sciences, the discipline of clinical medicine and the provision of health care to the public.*
2. Identification of Practice Gaps - Each activity will be planned to 1) address a valid professional practice gap in knowledge, competence or performance and 2) encourage a change in practice behavior of the targeted population of physicians.
3. The practice gap and desired result of the education will be discussed with faculty to enable development of content that will best address the educational need and accomplish the desired results.
4. Objectives - Measurable learning objectives will be formulated that describe the desired result of the education that will address the identified practice gap.
5. Format– The activity will incorporate educational formats that include interactive components. The activity format will be appropriate for the setting, objectives and to achieve the desired results.
 - ✦ Enduring materials/Internet Enduring materials – Activities will be in alignment with the AMA and ACCME requirements for enduring materials and Internet education.
 - ✦ Journal-based education – Activities will comply with the AMA and ACCME requirements for journal-based education.
6. Evaluation –Evaluation methods will assess whether the activity met the stated objectives and resulted in a change in practice.
7. Faculty - Faculty will be selected based on their ability to address the identified educational need(s) and recognized expertise on the topic. They will be informed of the expectations for faculty to deliver AMA PRA Category 1 education.
 - a. Faculty may be selected from a variety of sources as outlined in the ACCME standards. Selection is the responsibility of the planning committee or designee authorized to act on behalf of the activity planning committee, subject to approval by the CIPE Committee or Chairman.

- b. Employees of commercial interests may not serve as faculty unless the educational content is unrelated to their employer's product lines or services or if their role is covered in the exceptions described by the ACCME.
 - c. Honorarium amounts and arrangements for reimbursement of expenses shall be set in advance, with no adjustments after the fact. The amount should be suitable and customary and may not exceed fair market value, without consideration of referrals generated, tax implications for faculty, or inclusion of specific content in the presentation(s). Fair market value and reimbursement of expenses will be determined according to Banner Health guidelines. No additional payments may be made to speakers outside of those documented in an agreement. A written agreement between faculty and Banner Health is required and must be executed prior to the CME activity, as directed by Banner Health policy.
8. Objectivity/Disclosure of Conflicts of Interest - Educational activities must be free of commercial bias and influence. To that end, the following policies and procedures have been implemented:
- a. **CME Disclosure Policy** - It is the policy of Banner Health to ensure balance, independence, objectivity, and scientific rigor in all its sponsored or jointly provided continuing medical education. To this end, all program planners and faculty participating in Banner Health sponsored CME must disclose financial relationships they or their spouse/partner have, or have had, with commercial interest within the past 12 months. Commercial interests include entities producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Failure to provide disclosure information will result in disqualification from participation. The intent of this policy is to identify conflicts of interest, facilitate resolution according to Banner policy, and ensure disclosure information is provided to participants prior to the activity, so they may form their own judgment as to the objectivity of the educational content.
 - b. **Resolution of Conflicts of Interest** - If a speaker or planner reports a conflict of interest on the disclosure form, the CME manager or designee will initiate resolution. A CIPE Chairman or appropriate representative(s), as determined by the chairman, will review the nature of the conflict of interest and may review the activity content to determine an acceptable resolution. Resolution decisions may include: 1) no further action required - the potential conflict of interest reported will not have an impact on the content of the activity; 2) requesting the speaker be replaced; 3) limiting a planner's involvement to a portion of the content; or 4) revising the content of the activity.
 - c. Appropriate acknowledgement of commercial support may be a verbal statement of appreciation by the moderator(s) or listing providers of grants and/or exhibitors without commercial logos on a slide at the beginning of the activity and after breaks. The slide may not be displayed during the educational content or as a default slide interspersed between presentations.
 - d. Employees of a commercial interest may not participate in planning educational content, speaker selection or evaluation of an activity.
 - e. Promotional activities are not allowed in the room where the education is taking place nor directly outside the room immediately before or after the activity. This includes commercial representatives actively engaging with participants for promotional purposes.

9. Program Content

- a. Information provided will be based on scientific principles generally accepted by the medical community. If a speaker's presentation contains discussion of unlabeled or investigational use of any product, they must disclose that information to the audience.
 - b. Banner complies with the ACCME expectations described in the *Validation of the Clinical Content of CME*: "Recommendations on clinical medicine provided in a CME activity must be based on evidence accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients. Any research cited as justification for patient care recommendations must conform to the generally accepted standards of experimental design, data collection and analysis."
10. Banner Policies - Compliance with pertinent Banner Health policies and guidelines is required.
11. Agreements - Appropriate written agreements will be executed with speakers, industry or other commercial entities, as required by ACCME and Banner Health policies.
12. Location – Activities will be held at locations appropriate to support an educational activity. See Section G. 3. (a & b)
13. Attendance Records – There will be a mechanism to record physician attendance accurately. Attendance records will be retained for six years by the Banner CME Office. Credit reports or certificates will be available to participants after the activity, upon receipt of all documentation.
14. Confidentiality – Records will be maintained in accordance with applicable Banner Policies. Internet education will contain specific confirmation defining how confidentiality will be maintained.
15. Food and Drink - Refreshments will be reasonable, customary, and consistent with other Banner policies and in keeping with the circumstances of the event, i.e., the education may be provided in conjunction with a special event, reception, or other special occasion. Registration fees must take into account the fair market value of any refreshments offered at a CME program.
16. Fair Market Value –Determination of the fair market value of the event/honoraria will be in accordance with applicable Banner policies, which involves review of a sampling of registration fees for similar educational events.

E. **Joint Providership** - Banner Health may partner with non-accredited organizations, excluding commercial interests as defined by the ACCME, to develop and jointly provide educational activities. Banner takes full responsibility for planning, implementing and evaluating the activity, and may delegate related duties. Potential partnerships will be considered for approval by the CME Manager and Sr. Director, with input from the CIPE Chairman as indicated, on a case by case basis. Primary considerations will be whether the partnership is in alignment with Banner Health's strategic direction and qualifies as valid physician education, using AMA, ACCME and Banner policies as guidelines.

1. Jointly provided activities will comply with ACCME accreditation requirements and policies, the AMA-PRA credit system, and Banner policies as outlined herein.
 - a. Banner will maintain responsibility; however, the non-accredited entity will be accountable for handling funds, subject to requirements listed under *II. G. Funding*. A projected budget must be submitted with the application. Banner CME representatives will review and approve the management of funds during the planning process. A report

of actual income and expenses must be provided at the completion of the event and upon request during the planning process.

- b. Commercial Support Agreements will be between Banner Health and the commercial entity.
 - c. Banner Health's name and logo must appear prominently on promotional materials.
2. A joint-providership fee will be assessed using the *Fee Assessment* tool which allows for rate adjustments at the discretion of CME leadership, based on the non-accredited organization's circumstances. Considerations will be funding resources, non-profit status, potential for improvement of quality of patient care at Banner facilities and possibly other extenuating circumstances.

F. Types of Activities

Single Courses (Conferences presented one time or annually)

A CME Credit Application is required to be submitted for each event.

Regularly Scheduled Series (Grand Rounds, tumor boards) – A single CME Credit Application will be required for a series of regularly scheduled sessions. General objectives will be developed to support the goal of the series. Specific objectives will be developed for each didactic session that will correlate with the goal of the series, with the exception of case-based sessions. All requirements listed under *Section II.D.* apply to each session in the series.

Repeated courses (Banner courses repeated to effectively reach the target physician audience, i.e., EMR training, clinical initiative education) – One CME Credit Application will be required. A general goal will be developed to encompass the target audience and various sites. Any changes in the course content or faculty must be submitted for approval. Each occurrence will comply with all ACCME, AMA and Banner requirements and be identified as single courses on ACCME annual reports.

Specialty didactic series or repeated courses with overarching goal (professional societies, outreach education) – A single CME Credit Application will be required for approval and as each session or course is scheduled at a site, the CME Office should be notified. All requirements listed under *Section II.D.* apply to every occurrence.

G. **Funding** – Funds may be provided from a variety of sources and may never have “strings attached”, i.e., funding sources will have no influence over topic, content or faculty selection. Income and Expenses will be clearly accounted for.

1. Banner budgeted funds may be used to decrease registration fees, subject to the limitations set forth in Sections II.G.3.a and b.
2. **Commercial Support & Exhibit Fees**- Unrestricted grants or fees for exhibit space may be accepted from commercial entities, subject to the *ACCME Standards for Commercial Support* and Banner policies that apply. Important points include:
 - a. Banner Health maintains control of the content and delivery of the activity.
 - b. An ACCME-defined commercial interest may not make direct or additional payments to director, planners, teachers or others involved in planning the education.
 - c. Commercial funds may not be used to pay any expenses, personal or other, for nonteacher or non-author participants of a CME activity.
 - d. Educational grants require a signed agreement between Banner and the commercial supporter. A commercial supporter's standard agreement may be acceptable if it

- correlates with the stipulations of Banner’s commercial support agreement, which is in alignment with ACCME requirements.
- e. Commercially initiated activities or social events will not interfere with or overshadow the educational activity (See also II.C.8.d.)
 - f. Commercial support should be in the form of an unrestricted educational grant.
 - g. Exhibit space must in a separate area from the room where the education is taking place.
3. Appropriate registration fees may be charged based on fair market value and subject to the following considerations:
 - a. If the CME activity (i) is held on the hospital campus, (ii) is open to all members of the hospital’s medical staff or all members of a given specialty on the medical staff, and (iii) has a fair market value, including refreshments, of \$25.00 or less, then registration fees may be charged for all attendees, but are not required, or may be reduced or subsidized.
 - b. If the CME activity does not meet the criteria set forth in a., then a registration fee equal to the fair market value of the program must be charged to the attendees unless: (i) the attendee is an employee of Banner, or (ii) the attendee has (A) executed a medical staff services letter agreement pursuant to which Banner agrees that it may provide CME at no or reduced fees, and (B) the substantive content of the CME activity is such that Banner will receive a recognizable and substantial benefit from having members of its medical staffs obtain such CME. If the requirement of (i) or (ii) are satisfied, then registration fees may be charged to the attendee, but are not required, or may be reduced or subsidized.

III. Credit Review Procedure and Intervention(s):

AMA PRA Category 1 Credit™

- A. The Banner CME Office processes proposals for *AMA PRA Category 1 Credit™*. The CME manager or a CME Operations Coordinator reviews the proposal according to criteria listed under *Section II.D.*, and submits the completed proposal to the CIPE Committee.
- B. The Continuing Interprofessional Education Committee
 1. The CIPE Committee will review proposals, determine if they qualify for credit and designate hours. If conflicts of interest exist, the committee will determine resolution according to the *Disclosure and Resolution of Conflicts of Interest* policy – *Section II.D.8*.
 2. The CIPE Committee Chairman or Sr. Director will serve as final authorities in decisions related to credit approval.
 3. A CME Chairman, a CIPE Committee member, and the CME Manager, or in the absence of the manager, a CME Operations Coordinator, may review and approve *AMA PRA Category 1 Credit™* outside a formal committee meeting, if the situation warrants, provided the activity meets the criteria listed under *Section II.D*. The approved activity will be presented at the next CIPE Committee meeting.
 4. The CIPE Committee will review serious or consistent issues of noncompliance and determine further actions.
 5. The CIPE Committee will ensure currency of enduring materials.

Pharmacy Credit

1. The CIPE Continuing Pharmacy Education (CPE) Subcommittee will be established to review pharmacy education and ensure compliance with the Accreditation Council for

Pharmacy Education (ACPE) requirements. (See *Education for Pharmacists and Pharmacy Technicians* policy).

2. The CPE Subcommittee will be comprised of an ACPE Administrator, Pharmacy clinical Development Professional, and CME Manager and CME Operations Coordinator.

C. Activity planners are responsible for compiling and submitting all required documentation, which includes, but is not limited to:

- ✦ needs assessment data (relevant to practice gaps)
- ✦ faculty confirmation, expectations of faculty of certified CME, and letters of agreement
- ✦ commercial support agreements
- ✦ faculty and planners' disclosure information
- ✦ registration, attendance records (sign-in sheets)
- ✦ projected budget and accounting of actual income and expenses.

IV. References:

- A. Accreditation Council for Continuing Medical Education (ACCME)
 - ✦ Essential Areas and Standards
 - ✦ Standards for Commercial Support
 - ✦ Content Validation Statement
- B. American Medical Association Physician's Recognition Award (AMA PRA)
 - ✦ *Requirements for Accredited Providers* Information Booklet - 2017 Revision
 - Gifts to Physicians from Industry
 - Opinion 8.061 Ethical Issues in CME
 - Opinion 9.011 Principles of Medical Ethics
- C. Accreditation Council for Pharmacy Education (ACPE) *Policy and Procedures*

VII. Additional Related Policies and Documents:

- A. Continuing Education for Pharmacy and Pharmacy Technicians Policy
- B. CME Mission Statement
- C. CME Office Procedures
- C. Disclosure and Resolution of Conflict of Interest Policy
- D. Applicable Banner Health policies, such as, but not limited to, the following areas: ○
Business Courtesies, Meals and Entertainment ○ Business Travel and Expenses ○
Business Gifts ○ Confidentiality ○ Contract Review

VIII. Cross Index As:

- A. Education, medical
- B. Education, physician

Revised February 2019