



# Continuing Medical Education

# POTPOURRI

May 20, 2022

# POTPOURRI TOPICS

- Signing onto Existing Grant Agreements
- Restricted vs. Non-Restricted Commercial Support
- Sponsors, Exhibitors and Supporters
- Subjective vs. Objective Assessment/Evaluation
- Discussion Forum CME
- Repeated CME Offerings

# Signing Onto Existing Grant Agreements



# Standard 4: Manage Commercial Support Appropriately

## 4.2 - Agreements:

The terms, conditions, and purposes of commercial support must be documented in an agreement between the ineligible company and the accredited provider.

The agreement must be executed prior to the start of the accredited education.

An accredited provider can sign onto an existing agreement between an accredited provider and a commercial supporter by indicating its acceptance of the terms, conditions, and amount of commercial support it will receive.

# The Key Here is:

An accredited provider can only sign onto an existing agreement between another accredited provider and a commercial supporter.

Because non-accredited organizations are not subject to the Standards for Integrity and Independence in Accredited CE, the ACCME advises it is not appropriate for an accredited provider to enter into agreements previously signed by non-accredited organizations and ineligible companies (commercial supporters).

# ISMA Example

ISMA was approached by Indiana Hemophilia & Thrombosis Center (IHTC) to joint-provide on a project for educating ED providers on Sickle Cell Disease.

IHTC had already applied for an educational grant with **Global Blood Therapeutics** and been granted approval. Further investigation revealed funds had already been awarded to them.

- The organization approached ISMA too late in the process
- ISMA would need to have applied on behalf of IHTC
- IHTC could have then signed on as a third party
- Ultimately ISMA had to turn the provider down

# Further Clarification

It remains acceptable for a joint provider who is a non-accredited educational partner to receive and disseminate commercial support funds, as long as the accredited CME provider obtains a record of how the funds are used.

## 4.3. - Accountability:

The accredited provider must keep a record of the amount or kind of commercial support received and how it was used, and must produce that accounting, upon request, by the accrediting body or by the ineligible company that provided the commercial support.

# Budget Template



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## Indiana State Medical Association (ISMA)

### CME JOINT PROVIDER ACTIVITY BUDGET AND DOCUMENTATION OF COMMERCIAL SUPPORT/GRANTS TEMPLATE

The Joint Provider will, at the conclusion of the activity, fill out and submit an Activity Budget, detailing all revenue and expenses associated with the activity, including all commercial support and grants. This information is kept on file by the ISMA. While a template is included below, you may choose to use your own.

#### Title of CME Activity

#### Activity Date

#### Activity Location

Income Category	Budget	Actual	Expense Category	Budget	Actual
Registration Fees			Marketing		
Meal Charge			Save-the-date cards		
			Brochure		
			Advertisements		
Subtotal			Mailing Labels		
Commercial Support (List Sources)			Postage		
			Other (Specify)		
			Other (Specify)		
			Subtotal—Marketing		
			Meeting Space and Logistics		
Subtotal—Commercial Support			Audiovisuals		
Exhibitors (List Sources)			Audience response system		
			Meeting room rental		
			Hotel Lodging (faculty/staff only)		
			Meals		
			Syllabus and other handouts		
			Supplies		
			Other (Specify)		
			Subtotal—Meeting Space/Logistics		
			Honoraria and Travel Expenses (list faculty)		
Subtotal—Exhibitors					
In-kind Contributions					
Subtotal—In-kind Contributions			Subtotal—Honoraria/Travel Expenses		
Other (Specify—e.g., government)			Other Expenses		
			Administrative fee (Joint Provider Fee)		
			Operational expenses		
			Other certification fee		
Subtotal—Other			Subtotal—Other Expense		
TOTAL INCOME			TOTAL EXPENSES		
NET GAIN OR (LOSS)					

# Letter of Agreement Template



## Commercial Support Agreement Attestation

### Activity Title

### Activity Date

The Ineligible Company, SHO, and [redacted] attests they have carefully read and agree to abide by all requirements of the [ACCME Standards for Integrity and Independence in Accredited Continuing Education available at https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce](https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce).

### Name of Accredited Provider

### Suburban Health Organization

Contact Person: Terri Neaderhiser  
Phone Number: 317-295-5283  
Email Address: terrin@suburbanhealth.com  
Fax Number: 317-692-5233

### Joint Provider

Tax ID Number: [redacted]  
Contact Person: [redacted]  
Phone Number: [redacted]  
Email Address: [redacted]  
Fax Number: [redacted]

### Name of Ineligible Company

### (aka Commercial Interest)

Tax ID Number: [redacted]  
Contact Person: [redacted]  
Address: [redacted]  
City, State, Zip: [redacted]  
Phone Number: [redacted]  
Email Address: [redacted]  
Fax Number: [redacted]

## Agreed by Authorized Representatives

### Ineligible Company (aka Commercial Interest)

### Joint Provider, if Applicable

#### Signature and Date

#### Signature and Date

#### Printed Name

#### Printed Name

#### Title

#### Title

### SHO Member Hospital

### Accredited Provider

#### Signature and Date

#### Signature and Date

#### Printed Name

Terri Neaderhiser, LSW, CCM  
Printed Name

#### Organization/Title

Suburban Health Organization,  
CE Program Administrator  
Organization/Title



# Restricted vs. Unrestricted Commercial Support



# What is the Difference Between Restricted and Unrestricted Grants?

## Restricted Funds:

Monies set aside for a particular purpose as a result of designated giving. They are permanently restricted to that purpose and cannot be used for other expenses.

## Unrestricted Funds:

A grant, donation, gift or pledge to a qualified institution without restriction of any kind on the use or application of the funds received by the institution.

# In the Past Commercial Support Had to be Unrestricted? Do the New Standards Address This?

With implementation of the Standards for Integrity and Independence in Accredited CE, all requirements for management of commercial support are included in Standard 4.

ACCME states while they are aware that many commercial supporters provided support in the form of "unrestricted educational grants", it is not now, and was not in the past, an ACCME requirement that the support has to be referred to by this term.

# Commercial Support

## ACCME FINAL DECREE:

In choosing to accept commercial support, a provider must ensure that any written agreement that it signs would not include terms or conditions that would obligate them to operate outside of the expectations in Standard 4.

# Sponsors, Exhibitors and Supporters



# These Terms Are Often Used Interchangeably

**What is the Difference Between  
an Exhibitor and a Sponsor?  
Do they mean the same thing,  
and can they be used interchangeably?**

It is common to hear providers use these two terms in one breath. Typically, they are referring to those who are marketing/exhibiting.

An individual or company can be listed as a sponsor and an exhibitor at the same time, but they don't mean the same thing.

# Difference in Level of Investment

## Exhibitors

An exhibitor invests in an event primarily to showcase products and services.

Exhibitors get to purchase booth locations as an advertisement and design their exhibition stands. They aim to make direct sales and generate leads.

## Sponsors (beyond the booth)

A sponsor at an event is a company that provides support for associations organizing a conference or marketing show. Typically, the support is in the form of providing funds to the organizers.

In return, sponsors get increased brand exposure at the event, **depending on the level of support provided (Platinum, Diamond, Gold, Silver, Bronze)**. Their logo and organization's description could be listed on the conference webpage, in the conference brochure and program, and in event signage. Other benefits could include discounted event tickets.



# Supporters

## **Supporters are considered Grantors.....**

with medical education grants supporting patients by providing funds for the continuing medical education of healthcare professionals.

Grants are issued in support of accredited CME programs such as:

- Seminars
- Symposia
- Grand Rounds
- Sessions at physician specialty meetings and conventions

**Educational grants are funded in a manner that preserves the independence of CME from commercial influence and complies with applicable federal and state laws and regulations, and the Standards for Integrity & Independence in Accredited CE.**



# **Sponsor/Exhibitor Involvement Should be Managed in Keeping with Standard 5**

**“Manage Ancillary Activities Offered in Conjunction  
with Accredited Continuing Education”**

- ACCME policies do not prohibit an accredited provider from giving optimal promotional opportunities to exhibitors based on a tiered fee structure.
- Corporate logos can be used in acknowledgements, whether for eligible or ineligible companies.

# Supporter Involvement Should be Managed in Keeping with Standard 4

“Manage Commercial Support Appropriately”

- Disclosure must not include the ineligible companies' corporate or product logos, trade names, or product group messages.

# Subjective vs. Objective Assessment/Evaluation



# In PARS a Provider is Asked to Indicate What Type of Outcomes will be Measured – Objective or Subjective

Which of the following outcomes will be measured? Select at least one. \*

- ☒ **Learner Competence**  
Learner shows how to do
  - ☐ Objective measurement (e.g., observed, tested)
  - ☐ Subjective measurement (e.g., self-reported)
- ☐ **Learner Performance**  
Learner demonstrates in practice
- ☐ **Patient Health**  
Effects of what learner has done for a few
- ☐ **Community/Population Health**  
Effects of what learner has done for many

## What's the Difference?

# **In most cases, it comes down to whether something is based on personal experience or on verifiable facts**

## **Subjective Assessment**

Generally speaking, subjective is used to describe something that exists in the mind of a person or that pertains to viewpoints of an individual person. It implies that it comes with (or is based on) personal biases.

## **Objective Assessment**

Objective means not influenced by an individual's personal viewpoint—unbiased. It's often used to describe things like observations, decisions, or reports that are based on an unbiased analysis. Something that's truly objective has nothing to do with a person's own feelings or views—it just deals with facts.

# The Majority of CME Providers are Conducting Subjective Measurement Following Their CME Activities



# Discussion Forum CME



# What is a Discussion Forum?

It consists of a brief opening presentation, followed by a facilitated discussion.

## Did You Know You Can Offer Credit for It?

It must be a structured learning activity with some type of assessment of the learner that measures achievement of the educational purpose and/or objective of the activity.



# AMA Requirements

## 5. What types of CME activities may be certified for *AMA PRA Category 1 Credit™* through an accredited CME provider?

The types of CME activities certified by U.S.-based accredited CME providers include the following:

- **Live activities** - CME activity that occurs at a specific time as scheduled by the accredited CME provider. Participation may be in person or remotely as is the case of teleconferences or live Internet webinars. These may be offered through a variety of delivery mechanisms; examples include, but are not limited to, national, regional or local conferences, workshops, seminars, regularly scheduled conferences, journal clubs, simulation workshops, structured learning activities presented during a committee meeting and live Internet webinars.

## Core requirements for certifying activities for *AMA PRA Category 1 Credit™*

1. The CME activity must conform to the AMA/ACCME definition of CME.
2. The CME activity must address an educational need (knowledge, competence or performance) that underlies the professional practice gaps of that activity's learners.
3. The CME activity must present content appropriate in depth and scope for the intended physician learners.
4. When appropriate to the activity and the learners, the accredited provider should communicate the identified educational purpose and/or objectives for the activity, and provide clear instructions on how to successfully complete the activity.
5. The CME activity must utilize one or more learning methodologies appropriate to the activity's educational purpose and/or objectives.
6. The CME activity must provide an assessment of the learner that measures achievement of the educational purpose and/or objective of the activity.
7. The CME activity must be planned and implemented in accordance with the ACCME Standards for Commercial Support: Standards to Ensure Independence in CME Activities<sup>SM</sup>.

# What Activity Format Is It Considered?

Since this is an activity in which learners participate in real time, it would be best categorized as a **“live course.”**



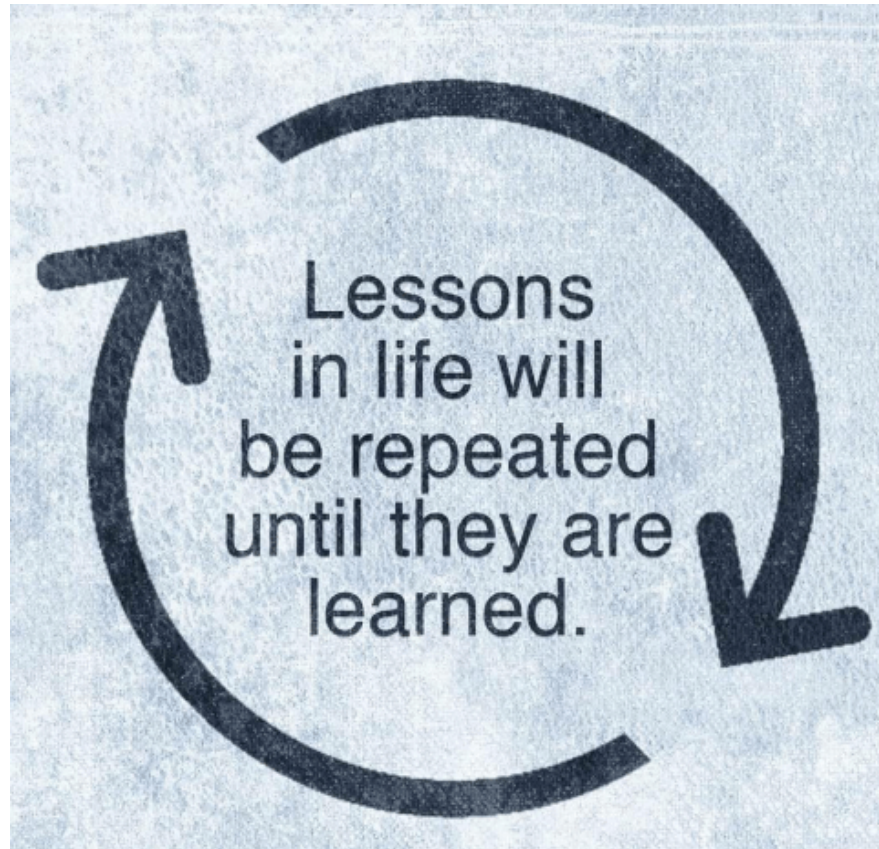
# A New Format for ISMA “Women in Medicine”

## ISMA launches Women in Medicine Virtual Discussion Forum

Registration is now open for ISMA’s monthly Women in Medicine (WIM) Virtual Discussion Forum. All women members of ISMA are welcome to join us to connect, network and discuss topics of interest. Live sessions occur the third Tuesday of each month from 7 to 8 p.m. ET via Zoom, and each will be accredited for 1.0 *AMA PRA Category 1 Credits™*. Registration is required.

<b>DATE</b>	<b>TOPIC</b>
April 19	<b>Self-Valuation</b>
May 17	<b>Career Path Options</b>
June 21	<b>Leadership Within ISMA</b>
July 19	<b>Practical Tips for Leaders</b>
Aug. 16	<b>Leadership and Influence in the C-Suite</b>
Sept. 20	<b>TBA</b>
Oct. 18	<b>Coaching and Mentoring</b>
Nov. 15	<b>Self-Care: An Integrative Approach</b>
Dec. 20	<b>Holiday Celebration</b>

# Repeated CME Offerings





# Definition:

- Live activities where the **same content** is **offered multiple times** for different audiences are considered courses and not regularly scheduled series activities.
- Each instance of the course would be reported as a separate activity in PARS.

## A New Joint-Provider Relationship for ISMA



Joint Provider: Kenney Orthopedics

Audience: Physicians and PAs

Activity Title: Prosthetics & Orthotics – A Team Approach and Early Intervention

Original Educational Activity (1-hour):  
\$300

10 Repeat Offerings @ \$250/each: \$2,500

Total Contract: \$2,800

Location(s): Region of Indiana, Kentucky  
and North Carolina

# Vetting a Joint Provider Relationship

**Joint providership** has been an established process which affords accredited organizations the opportunity to collaborate with non-accredited organizations to enhance the diversity and value of their educational offerings.

Accredited providers are prohibited from collaborating with **ineligible companies** on jointly provided CME activities by ACCME's Eligibility requirements.

The accredited provider is responsible for ensuring that jointly provided activities comply with all ACCME rules and are accountable for demonstrating compliance during the reaccreditation process.

# Vetting Kenney Orthopedics

Kenney Orthopedics provides prosthetic & orthotic care in 17 different clinical office locations. Their Certified Professional Orthotists work with patients to increase their mobility and independence. They also fit for and make/cast the knee-cap (socket) where all joint components come together.

Kenney Ortho is not a manufacturer of the joint components themselves..... those are obtained from outside sources/manufacturers and then assembled in-house at their fabrication facility, fitting all customized pieces together.

We consulted with ACCME. They advised they would consider organizations that develop custom prosthetics to be providers of clinical services, and therefore eligible to work in joint providership with an accredited provider.





**QUESTIONS?**

**COMMENTS?**

**CONCERNS?**



**ISMA**  
INDIANA  
STATE  
MEDICAL  
ASSOCIATION

# Comments?

- **Have any of you signed onto an Existing Grant Agreement?**
- **How many of you are currently working with or have decided to take on Joint Providers? What has been your experience?**
- **What types of new activity formats have you experimented with? (Blended Learning?)**