

COMMITTEE ON
ACCREDITATION & CONTINUING MEDICAL EDUCATION

Policies & Procedures for Joint Providership

This manual was designed to provide guidance for personnel of non-accredited organizations seeking *AMA PRA Category 1 Credit™* for physicians through joint providership with the Florida Medical Association Committee on CME & Accreditation.

All policies and procedures in this manual are directed toward compliance with the Accreditation Council for CME Criteria, *Standards for Commercial Support*, and FMA Policies and Procedures as adopted by the FMA.

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Table of Contents

I. Background/Reference Information.....	2
ACCME Essential Areas and Policies	2
<i>AMA PRA Category 1 Credit™</i>	3
II. Joint Providership Policies	4
Eligibility	4
Requirements	5
III. Brochure and Certificate Requirements	9
IV. Joint Providership Procedures	10

I. Background/Reference Information

- **What is Joint Providership?**

Joint Providership is the mutual planning, implementation and evaluation of a CME activity between an accredited provider, such as the Florida Medical Association (FMA), and an un-accredited organization.

The accredited provider in a joint Providership relationship is responsible for ensuring compliance with the ACCME Criteria, *Standards for Commercial Support-Standards to Ensure the Independence of CME Activities*, and *FMA Policies and Procedure*.

- **What are the ACCME Essential Areas and Policies?**

The Accreditation Council for Continuing Medical Education (ACCME) is the official accrediting organization for Continuing Medical Education (CME). The Accreditation Criteria is a set of principles that must be met in order to achieve accredited status for CME. These criteria have been fully adopted by the FMA. A full copy of the Accreditation Criteria and *Standards for Commercial Support-Standards to Ensure the Independence of CME Activities* are available by clicking here: [ACCME Standards for Commercial Support](#).

The ACCME defines joint Providership as the providership of a CME activity by one accredited and one non-accredited organization. The accredited provider shall accept responsibility that the ACCME accreditation policies and procedures are met when educational activities are planned and presented in jointly provided activities with unaccredited partners.

1. The accredited provider must be able to provide the ACCME with written documentation that demonstrates how each jointly provided CME activity was planned and implemented in compliance with the ACCME policies and procedures.
2. All printed materials (brochures, certificates, meeting programs, etc.) for jointly provided activities must feature the following statement:

This activity has been planned and implemented in accordance with the accreditation requirements and policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint providership of The Florida Medical Association and (name of non-accredited provider). The Florida Medical Association is accredited by the ACCME to provide continuing medical education for physicians.

The FMA will utilize specific written policies and operating procedures to effectively govern the planning and implementation of jointly provided activities. The FMA may require that the unaccredited partner meet requirements that are more restrictive than or exceed the minimum requirements of the ACCME if deemed necessary.

- **What is AMA PRA Category 1 Credit™?**

AMA PRA Category 1 credit™ is a type of educational credit that can be applied toward the American Medical Association Physician's Recognition Award. It is also the type of credit required for license renewal for Florida allopathic physicians.

An activity can be designated *AMA PRA Category 1 Credit™* if it is planned by an accredited provider. Providers must assure that their activities:

1. Conform to the AMA definition of CME:

Continuing medical education is defined as educational activities that 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.
2. Present content appropriate in depth and scope for a physician audience.
3. Conform to both the relevant Council on Ethical and Judicial Affairs (CEJA) opinions (8.061 “Gifts to physicians from industry” and 9.011 “Ethical issues in CME”), as well as the ACCME *Standards for Commercial Support-Standards to Ensure the Independence of CME Activities* and are non-promotional in nature.
4. Address demonstrated educational needs
5. Communicate a clearly identified educational purpose and/or objectives
6. Use learning methodologies and format(s) appropriate to the activity’s educational purpose and/or objectives
7. Use evaluation mechanisms to assess an activity’s quality and relevance to its purpose and/or objectives
8. Include a means for the provider to record the actual credits claimed by each physician participant (physicians are ethically obligated to only claim credit consistent with the extent of their participation in a CME activity).
9. Are designated for AMA PRA Category 1 Credit in advance; activities cannot be retroactively designated for Category 1 credit.
10. Include the Designation Statement in any activity materials that reference CME, with the exception of “save-the-date” or similar notices.

II. Joint Providership Policies

A. Eligibility for Joint Providership

1. The Florida Medical Association Committee on CME & Accreditation will consider for joint providership only those CME activities in which its members have participated in planning, implementation and evaluation. Each applying organization must submit a completed Activity Development Worksheet (application) and all required supplemental materials.

In addition, the primary purpose of the meeting must be to educate physicians who are licensed in Florida. As a general rule, no more than 30% of the audience may be from outside the state of Florida.

2. Retroactive Credit is never granted. All documentation for a CME activity must be completed, reviewed, and approved in advance of the activity date.
3. The Committee on CME & Accreditation will consider for joint providership, CME

activities developed with the following organizations:

- County medical societies
 - State specialty societies
 - Community hospitals and clinics in Florida
4. The Committee on CME & Accreditation will not jointly sponsor the following types of activities:
- National and international organizations
 - Groups other than specialty societies seeking more than 12 CME credits for a single meeting
 - Groups who wish to publish enduring materials (video tapes, online or journal CME)
 - Groups who wish to hold CME activities on a cruise ship or outside of Florida
5. LEGISLATIVE ADVOCACY CME programs may be acceptable for CME credit provided the activity meets all requirements of the ACCME Criteria and *Standards for Commercial - Support-Standards to Ensure Independence in CME*.

B. Topics Unacceptable for Joint Providership

- reimbursement enhancement
- marketing
- character development
- teaching
- free discussion periods
- self study

NOTE: Risk management topics are accepted for consideration for joint providership; other management-related topics will be considered only if they are designed to enhance knowledge, improve competence and/or performance.

C. Special Instructional Formats

The Committee on CME & Accreditation will not consider the following instructional formats for joint providership:

- enduring materials*
- teleconferences
- films/ video cassettes/ audiotapes
- remote courses without a proctor
- television programs
- computer aided instruction
- satellite broadcasts
- home study courses

* Enduring materials are printed, recorded, or computer-assisted instructional materials which may be used over time at various locations, and which in themselves constitute a planned CME activity (stand alone program).

D. Requirements for Joint Providership

1. Needs Assessment
- a. The FMA Committee on CME & Accreditation requires that a CME activity be based on specific, identified professional practice gaps or opportunities in order to be

considered for joint providership. These gaps/opportunities must be documented for each activity and should be linked to a specific desired result so that it is clear why the activity is being offered. This will assist the partner in assessing the ultimate success of the activity.

- b. Many methods exist to identify and assess the educational needs of physicians. Some sources for identifying physicians' educational needs are:

- 1) survey of target audience
- 2) national/specialty guidelines
- 3) peer reviewed literature
- 4) self-assessment
- 5) evaluations from prior programs
- 6) consensus of experts (focus groups)
- 7) meet state requirement
- 8) new technologies and treatment
- 9) national trends

2. Written Objectives or Purpose Statement

- a. Once identified, the needs must be addressed by the content presented. A set of objectives or a statement of purpose must be drafted.
- b. Educational objectives should indicate what the attendees should know or be able to do after the presentation of a topic.
- c. The educational objectives should be determined and approved by the Activity Director of the applying organization. Speaker(s) should be given the objectives/purpose statement in order to prepare their presentation(s) to fit the needs and objectives of the target audience.
- d. Four questions that may assist in the preparation of objectives are:
 - 1) Why is the program being given in the first place?
 - 2) What will it accomplish and what is it we want the audience to learn?
 - 3) What does the expert faculty think the audience should learn?
 - 4) How will the subject be presented and will the method of presentation help the physician learn and incorporate the information into her/his practice?

- 3. Our goal is to help you deliver continuing medical education that promotes a measureable change in physician competency and performance, with the ultimate goal of improving health outcomes.

- 4. Activity Director. All jointly provided activities must have an Activity Director who is:

- a. an FMA member
- b. familiar with all ideas, intents and proposed contents of the activity
- c. responsible for supervising the development, implementation, and evaluation of the activity

- 5. Activity Coordinator. All organizations seeking joint providership must assign a staff person to serve as Activity Coordinator. The Activity Coordinator is the contact person for FMA staff. Duties of the Activity Coordinator with the oversight and assistance of the Activity Director include:

- a. completing all paperwork associated with joint Providership application
 - b. obtaining all documentation and required signatures
 - c. maintaining an attendance roster and all activity records
 - d. summarizing individual activity evaluations
 - e. maintaining all activity records for six years
6. Disclosure. All planners and speakers are expected to disclose financial relationships with commercial interests which have a direct bearing on the subject matter of the CME activity. Specific guidelines for disclosure may be found in the *Standards for Commercial Support-Standards to Ensure the Independence of CME Activities (SCS)*, “An individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, a teacher, or an author of CME, and cannot have control of, or responsibility for, the development, management, presentation or evaluation of the CME activity. (SCS 2.2)
 7. FMA Committee Reviewer (“Reviewer”). If a financial interest with a Commercial Interest is identified through the disclosure process the CME activity may be assigned to a CME Committee Reviewer who:
 - a. is a member of the FMA Committee on CME & Accreditation
 - b. has authority to approve, require revisions or deny CME credit for the activity
 8. Resolving Conflicts of Interest. The non-accredited partner must be able to demonstrate that everyone who is in a position to control the content of an educational activity has disclosed all financial relationships which have a direct bearing on the subject matter. When an individual has such a relationship and control over the content of the activity, a *potential* conflict of interest exists; steps must be taken to resolve the conflict. This will be addressed on a case-by-case basis. The 60-day deadline for applications is designed to allow time for conflicts of interest to be resolved. Please [click here](#) to view a flowchart on how the FMA resolves a Conflict of Interest
 9. Disclaimer. Agreeing to jointly sponsor a CME activity does not indicate FMA endorsement or promotion of the activity. Approval indicates only that the FMA Committee on CME & Accreditation has agreed to jointly provide the educational aspects of the CME activity and to designate *AMA PRA Category 1 Credit™* for it.
 10. Joint Providership Records. Copies of all items used in planning, implementing and evaluating the CME activity should be retained by both the accredited organization and the unaccredited partner for six years.
 11. Regularly Scheduled Series (RSS). These types of activities may be eligible for joint providership if they are planned by and presented to the organization’s professional staff and have a standard set of objectives and a singular focus. Each session offered must comply with all Accreditation Criteria and policies. All meeting dates, list of potential presenters, and a sample agenda are required in advance. New applications are required each year, even if the components and documentation remain the same.
 12. Advertising. The FMA Education Department must review and approve all promotional materials prior to distribution including save-the-date notices that do not include CME information.

13. Exhibits. When commercial exhibits are part of the overall program, exhibits and commercial promotional materials shall not be displayed or distributed in the same room immediately before, during, or after an educational activity.

III. Brochure & Certificate Requirements

- A. The activity may not be advertised for CME credit prior to receiving official authorization from the Florida Medical Association Committee on CME & Accreditation. Wording such as “credit pending” or “Category 1 credit applied for” cannot be used on promotional materials, brochures, etc.
- B. Once official approval is received, all promotional materials and certificates must include the following statement, printed exactly as shown below, with the name of the unaccredited provider and the number of credits (hours) inserted:

This activity has been planned and implemented in accordance with the Essential Areas and policies of the Accreditation Council for Continuing Medical Education through the joint providership of the Florida Medical Association and [name of unaccredited provider]. The Florida Medical Association is accredited by the ACCME to provide continuing medical education for physicians.

The Florida Medical Association designates this educational activity for a maximum of [number of credits] AMA PRA Category 1 Credits™. Physicians should only claim credit commensurate with the extent of their participation in the activity.

- C. The Florida Medical Association must be listed on the front of the promotional material in the same size type and font as the name of the Joint Providership partner
- D. The brochure and final meeting program or agenda must list:
 1. planner(s) and speaker(s) disclosures of relevant financial relationships or the absence of such relationships.
 2. organizations providing commercial support, financial or in-kind
 - a) Organizations must be listed by name only, no logo or product group message
 3. educational objectives or statement of purpose
 4. target audience
 5. accreditation statement
- E. The evaluation form includes an opportunity for the learner to describe her/his intent to change. Typical questions to elicit this information might be, “What will you do differently as a result of this educational activity?” or “How will you apply what you learned?” The goal of CME activities is to deliver continuing medical education that promotes a measureable change in physician competency and performance, with the ultimate goal of improving health outcomes.

IV. Joint Providership Procedures

- A. Submit a completed Joint Providership Activity Development worksheet (application).

The Activity Development worksheet and supporting materials (shown on page one of the application) must be received by the FMA Education Department at least 60 days prior to the planned activity date in order for the joint providership partner to qualify for the lowest application fee.
- B. After review by the FMA Education Department staff, the application will be forwarded to the FMA CME Committee Reviewer for evaluation.
 1. The Reviewer will contact the Activity Director to discuss the program.
 2. The Planner will make suggestions about the program designed to ensure educational effectiveness and compliance with the ACCME Criteria and *Standards For Commercial Support-Standards to Ensure Independence in CME Activities*.
 3. The Reviewer will advise the Education Department about the telephone conference and will recommend that the program be approved, approved with changes or denied.
 4. If a potential conflict of interest is perceived, revisions may be required on the speaker's PowerPoint slides. If this occurs, the presentation must be re-reviewed before final approval can be granted.
- C. Supporting Documents.
 1. Disclosure Statement. Submit a Disclosure Statement for anyone who is in a position to control the content of an educational activity (planners and speakers).
 2. Method of documenting speaker disclosure. The speaker's commercial relationships as revealed on the Disclosure Statement must be communicated to the audience prior to the presentation. The relevant relationships should be included on the brochure and printed on the meeting program/agenda.
 3. Documentation of needs assessment, i.e., meeting minutes, survey results, statistical reports.
 4. Commercial support agreement. If the activity is receiving financial or in-kind support from a commercial interest, a Written Agreement for Commercial Support must be completed, signed by the company representative, Activity Director and FMA staff person and submitted with the application.
 5. Draft of promotional brochure and materials. All promotional materials must conform to the guidelines outlined under Brochure and Certificate Requirements above.
 6. Sample CME certificate for physicians and Certificate of Participation to be issued to all meeting participants.
 7. Sample evaluation form. All activities must be evaluated. You are not required to use the template word-for-word, but the final form must incorporate all of the components included on the sample.

8. The joint providership fee is calculated based on the total number of credits offered. Checks should be made payable to the Florida Medical Association.
- D. The Education Department staff will review the application and materials to ensure that:
1. The activity adheres to the structure discussed with the Reviewer
 2. All recommended changes have been implemented
 3. All supporting documentation is provided.
- Any questions or potential conflicts will be discussed with the Reviewer.
- E. Upon receipt of the Reviewer's recommendation and final review by the FMA Education Department, an official letter will be sent to the organization indicating approval or denial of the program for CME credit.
- F. Required Procedures at the activity:
1. An attendance roster must be maintained.
 2. Evaluation forms must be distributed to all meeting participants. If allied healthcare professionals attend and must use a form required by their accrediting organization, that is fine.
- G. Required procedures following the activity. The organization must send the following items to the Education Department ten days after the activity:
1. List of participants, in Excel format on the Attendance & Credits Spreadsheet provided
 2. a summary of the individual activity evaluations
 3. completed Budget Report form
 3. a copy of the final meeting program and all handouts, as distributed on site
- H. Changes. If the activity must be changed or postponed following submission of the official application, detail of the changes and reasons for them should be outlined in a memo to the Education Department. The changes will be reviewed and a decision made regarding the continued eligibility of the activity for CME credit. If the change involves the addition of commercial support, complete the Letter of Agreement for Commercial Support and include it with the request.
- I. Refunds. The Application Fee and/or any Late Fee imposed are non-refundable.