



Application for Joint Providership of CME Credits Policies

Western Michigan University Homer Stryker M.D. School of Medicine is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians.

It is our privilege to approve CME activities for category 1 credit of the Physician's Recognition Award of the American Medical Association. WMed supports the Accreditation Council for Continuing Medical Education Standards for Commercial Support. As an organization actively involved in the direct and joint providership of multiple CME programs and activities, we are responsible for the content of these activities, their adherence to the CME Essentials and the general integrity of their design and presentation. In order to maintain our accreditation as a sponsoring agency, WMed has implemented the policies and procedures in this application.

In this application you will find the policies and procedures you must follow in order to obtain CME credit for an activity. It is strongly recommended that you read through the policies and procedures in their entirety before you complete the application. Please keep the policies for reference as you plan your educational activity.

After reading the policies and procedures you can call the CE Coordinator if you have any questions.

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WMed CME Department Policies and Procedures

COMMON CME TERMS & DEFINITIONS

ACCME: Accreditation Council for CME. WMed must adhere to ACCME policies to keep our CME Accreditation; therefore, we have developed the policies you see in this CME application.

Accrediting Organization: The provider of the CME credits (WMed).

Commercial Interest/Commercial Supporter: A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Companies that provide direct patient care are **not** defined by the ACCME as commercial interests.

The following entities are NOT defined as commercial interests by the ACCME:

- 501-C Non-profit organizations (Note, ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint provider, but they can be a commercial supporter.)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

Course: A CME activity that only occurs once per year. (E.g. Research Day, West Michigan Air Care Fall Conference)

Enduring Materials: Materials created from a live CME program (audio/video tapes) for later use. CME credits may not be offered for enduring materials without permission from WMed CME department.

Exhibits/Displays: Tables at which commercial entities may advertise at an activity.

Joint Provider: Upon CME approval, Non-Accredited Provider and Accrediting Organization become Joint Providers of the CME activity.

Non-Accredited Provider: The person or organization that applies for CME Credit.

RSS: Regularly-scheduled series, an activity that occurs multiple times throughout the year. (E.g. Internal Medicine Grand Rounds, Cancer Conference)

CONFLICT OF INTEREST / DISCLOSURE

Definition: Conflict of interest is created when individuals in a position to control the content of CME have a relevant personal financial relationship with a commercial interest that benefits the individual in any financial amount and therefore, may bias their opinions. This may include receiving a salary, consulting fee, honoraria, ownership interest or other financial benefit. It also includes any relevant financial relationships held by the spouse or partner of the individual in control of CME content. Individuals are not required to indicate whether it is their own relationship or their spouse or partner's that is being disclosed.

Identification: WMed CE Office must identify conflicts of faculty and staff involved in the planning, implementation, and teaching of CME. This will be accomplished by using a Disclosure Form. Persons who indicate the existence of such relationships will be asked to agree in writing that said conflicts or relationships will not bias or otherwise influence their involvement in the program. Any person refusing to make disclosure or to sign attestation may not participate in accredited activity.

Resolution: All conflicts of interest must be resolved. The WMed CE Office has established a process by which disclosed relationships will be reviewed and a resolution made. Persons who indicate a financial relationship may be asked to limit their role in the planning of the activity or to submit their presentation in advance to ensure that it is not biased towards the company with which they have a relationship. This process will be documented on a Conflict of Interest Resolution Form.

Disclosure to Learners: The nature of such relations or conflicts must be disclosed to the audience in advance of the program or said individual's presentation. Attendees will be queried regarding their impressions concerning presence of commercial bias (or the absence thereof) within the activity and in specific presentations. Proof of this disclosure to learners must be submitted to the WMed CE Office no more than 30 days following the activity. It is best to make disclosure in writing, via handouts, the first slide of a PowerPoint presentation, a statement on the sign-in sheet, etc. Written disclosures must be somewhere that all attendees will be able to see them. If disclosure is given verbally during introductory remarks, an Oral Disclosure Attestation Form must be completed. This form should not be completed by the person who makes the disclosure announcement.

CONTENT VALIDATION

Definition: Accredited CME is accountable to the public for presenting clinical content that supports safe, effective patient care. Patient care recommendations made during CME activities must be accurate, reliable, and based on scientific evidence. Clinical care recommendations must be supported by data or information accepted within the profession of medicine. Specifically:

1. All the recommendations involving clinical medicine in a CME activity must be based on evidence that is accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients.
2. All scientific research referred to, reported, or used in CME in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection and analysis.

COMMERCIAL SUPPORT FUNDING

Payable to: All educational grants will be made payable to the WMed CE Office with a letter of agreement documenting this relationship, unless otherwise stipulated and agreed upon by WMed CE Office in advance. All checks for display fees will be made payable to WMed, unless otherwise stipulated and agreed upon by WMed CE Office in advance.

Acknowledgement: Commercial support shall be acknowledged on all printed materials.

Educational Grant Request/Application: All grant requests (example: pharmaceutical company grant applications) for CME programs will be applied for by the CE Office, unless prior written approval is given by the CE Director. Grant requests can only occur after the CME application is approved.

Funding: Direct payments from commercial companies to faculty or vendors are not permitted. WMed will reimburse the educational provider or the vendor for conference expenses; the educational provider will have vendors invoice them and will not invoice WMed. WMed will reimburse speakers for expenses and honorarium. WMed CE Office assumes no financial liability for the program.

Commercial Activities and Exhibits: Promotional materials will not be displayed in the conference presentation room. All exhibits and social events require the prior approval of the CE Office. Agents or representatives may attend CME activities but shall not engage in promotional/sales activities in the conference room, may not take part in discussions about branded products, or speak from the podium.

CME APPLICATION FEES

Any Organization seeking Joint Providership, except WMed and affiliates.

\$175	Notice of 90 days or more
\$250	Increased fee for applications with less than 90 days notice

WMed, Borgess Medical Center, Bronson Methodist Hospital, only if commercial companies are not providing support and conference registration fees are not charged to the attendees.

Waived	Notice of 90 days or more
\$175	Increased fee for applications with less than 90 days notice

WMed, Borgess Medical Center, Bronson Methodist Hospital, a commercial company is providing support and/or conference registration fees are charged to the attendees. Also all outreach program applications and certification course (e.g. ACLS or PALS) applications.

\$175	Notice of 90 days or more
\$250	Increased fee for applications with less than 90 days notice

PARAMETERS

Honorarium: All honoraria amounts are approved by the CE Director at WMed. Honoraria or planning fees will not be paid to applicant/sponsor or employees of sponsoring companies, unless pre-approved by the CE Director.

Example:

Listed below are reasonable and suggested amounts for a physician speaker at a grand rounds one-hour lecture. Ranges may be impacted by several factors.

Local speaker, Kalamazoo area	\$500 - \$750
Speaker within Southwest Michigan	\$500 - \$1000
Speaker with overnight stay	\$750 - \$1500
National speaker, no overnight stay	\$1000 - \$2000
National speaker with overnight stay	\$1000 - \$2500

Deadline: The completed application should be received by the CE Office 90 days in advance of the educational event along with the application fee. An increased application fee will apply as a penalty for applications received with less than 90 days notice. No application will be accepted with less than 30 days notice. No applications will be accepted in advance of one year.

Registration Fees: We reserve the right to register any WMed faculty member at no charge for evaluation and observatory purposes. The registration fees for WMed residents and medical students will be deferred; minimal fees for lunch & materials are acceptable.

Evaluations: The CE Office will provide all evaluation forms online through the CE website. In order for physicians to receive credit for attending a conference they must complete the CME evaluation form. Evaluation forms are available to attendees from the time your activity begins until 30 days after your activity ends.

CME Activity Codes:

Each evaluation form has an associated CME Activity Code. This code acts as an electronic sign-in sheet and is required to access the evaluation form. You are responsible for distributing this code to your attendees.

For Courses:

For one-time activities, there is a single CME Activity Code. It will be included in your application approval letter.

For RSS:

Each individual meeting of an RSS has a unique CME Activity Code. You are required to submit details about each meeting a minimum of two (2) weeks in advance. Once that information has been received, the CME Activity Code(s) will be emailed to you.

Post-Test Exception:

If using the CE Office's online post-test system, you will not be given a code to distribute. Direct your attendees to the CE website's Post-Test page. Upon passing the post-test, attendees will then receive the CME Activity Code and be redirected to the evaluation form log-in page.

Post-Tests: The CE Office can provide anonymous post-tests online through the CE website. The educational provider is responsible for submitting all questions and an answer key along with the passing score (e.g. 80%) a minimum of two weeks prior to the activity. All questions must be multiple choice or true/false. All attendees will be required to pass the post-test in order to receive the CME Activity Code.

Financial Responsibility: The sponsoring organization/department must agree to be responsible for all costs incurred by the conference. WMed CE Office will take no financial responsibility unless initially agreed upon.

Location: Location generally should be in Allegan, Barry, Berrien, Branch, Calhoun, Cass, Hillsdale, Kalamazoo, St Joseph, or Van Buren Counties. Please contact the CE Office in advance of applying if you are planning an activity outside of this region.

Agenda and Credit Hours: The number of category 1 credit hours offered is determined by the number of hours of instruction given at the program. It is necessary to attach an agenda of the conference. If you do not have your agenda finalized yet, you can still apply for CME credits but will need to send a tentative agenda with your application. The number of credit hours may change once a final agenda is submitted.

Speakers: Please submit all names, complete mailing addresses, and email addresses for your speakers. If your speaker has not been confirmed yet, please indicate so. Having an unconfirmed speaker does not prohibit you from applying for CME credit.

Planning Committee: At least once during the planning stages the Conference Planning Committee must meet as a whole. The committee consists of those individuals who have had input on the conference content and planning. A WMed representative is defined as a member of our faculty, staff, volunteer faculty member, or designee. CE staff members are not committee members unless they have had an active part in planning the conference. Pharmaceutical representatives should not be listed as committee members because commercial companies should not have influence over the course content. Please submit the names and email addresses of all planning committee members. Please also submit the minutes from planning meetings.

Applicant: Commercial Interests are prohibited from applying for CME credits.

Audience: CME programs must be primarily for physicians.

Budget: A budget for the program must accompany the CME application. A template is available on our website, or you may use your own form.

Incomplete Applications: You must answer all questions on the application and send all required attachments. Incomplete applications will be returned and will not be reviewed for CME approval until they are completed.

Tracking Credits: WMed tracks credits earned by doctors who attend activities WMed approves for CME, and these records are kept for six years. Nurses, physician assistants, or other attendees may also use our online system to maintain a record of their attendance, but they will not receive *AMA PRA Category 1 Credits™*.

Noncompliance: Failure to comply with CME policies/procedures could result in denial or withdrawal of approval.

TARGET AUDIENCE

Interpretation: The target audience is the population to whom the activity is directed. It may be narrow (e.g. oncologists) or broad (e.g. all persons involved in the care of individuals with developmental disabilities). It should be mainly focused on physicians although non-physicians may be included.

ATTENDANCE RESTRICTIONS

Interpretation: Attendance may be limited to only members of the target audience or by invitation only. Attendance may also be open to all attendees, regardless of whether or not they are in the target audience.

PRACTICE GAP

Interpretation: A practice gap can be defined as the difference between what physicians are actually doing in their practice and what they could/should be doing as it may impact patient outcomes, measuring against actual achievable treatment success. These gaps may be due to a multitude of reasons or challenges, including physician ability or environmental issues present in the world in which the physician operates. Gaps may occur on the individual, community, or population level. Gaps can be identified within clinical practice, research practice, education practice, and/or executive administration practice.

Levels: Practice gaps may be found at multiple levels – knowledge, competence, performance.

Knowledge: Physicians do not know about the topic being addressed. E.g. a new cancer treatment is being presented.

Competence: Physicians know about the topic but do not know how to apply it. E.g. physicians know that a new EHR has been implemented, but they have not been trained on how to use it.

Performance: Physicians both know about the topic and how to do apply it but are not doing so. E.g. hospital policy states that aspirin should be given to heart attack patients upon arrival at the ER, but patient statistics indicate that this is only happening 75% of the time.

Documentation: Documentation of the identified practice gap must accompany the CME Application for Joint Sponsorship. Performance data and performance measures at the national, state, or community level may be used to document a practice gap. An explanation of how the specific gap was

determined from that data must also be stated as well as the policy or committee from which the gap was identified (e.g. QI Committee).

For RSS: If you are planning a new RSS, the identified practice gap(s) may cover the activity overall. You are not required to identify a Practice Gap for each session.

Example:

You are planning a new RSS entitled Infectious Disease Grand Rounds. The identified Practice Gap is a higher than average rate hospital-acquired infections when compared to national statistics. Individual sessions may focus on physician knowledge, strategies for improving the rate of hospital-acquired infections, and measuring or changing individual performance. Each session relates back to the same Practice Gap.

If the RSS may cover a broad range of topics, you should plan to identify a Practice Gap for each session. The Practice Gap should then be submitted when you submit the details about each session to the CME Department.

Example:

You are planning a new RSS entitled WMed Medical Staff Symposium. It will cover a variety of topics related to the WMed clinics throughout the year. On your application, you should write, "Topics covered will include quality initiatives, malpractice issues, and treatment updates. Individual practice gap analysis will be done for each meeting."

Follow-Up: In order to determine whether or not the activity had an impact on the stated Practice Gap, a follow-up review must be done. This may take place near or on the date of the activity in the form of an attendee evaluation question asking whether or not attendees plan to make changes in their practice and/or performance and, if so, what changes they plan to make. The results should be reviewed and/or assessed by the activity planning committee as well as the WMed CE Office.

In addition, an Outcomes Assessment may take place 3-6 months following the last date of the activity. This may take the form of a survey of attendees on how they may or may not have changed their practice and/or a request for updated documentation showing whether or not the institution has seen a change in physician practice. The WMed CE Office reserves the right to determine which method or methods of follow-up is best for each activity.

Important Note:

While a practice gap may primarily be in physician knowledge, the educational activity should be designed to improve not only physician knowledge, but physician competence. The follow-up will focus on physician competence, performance, and/or patient outcomes. Follow-up only on physician knowledge is insufficient to show improvement in a practice gap.

EDUCATIONAL NEED

Interpretation: The educational need determines the necessity for the program and should largely emanate from the identified gap analysis. The educational need for a program is determined from the

point of view as to why it is necessary to have a program focusing on the chosen topic(s). The need must be different than the objectives for the program. Why does the physician need to learn what is being presented? Document it by showing proof as to your reasoning.

Documentation: Appropriate documentation for the Educational Need must accompany the CME Application for Joint Sponsorship. An explanation of the need is not acceptable documentation. Documentation may include, but is not limited to, any one or more of the following:

- Joint Commission
- Minutes from planning committee meetings
- Minutes from board of directors meeting
- Survey results
- Statistical data
- Documentation from peer review activity
- Written requests from experts
- Written requests from faculty
- Activity evaluations
- Post activity outcomes survey
- Minutes from department meetings
- Local/Regional health statistics

Examples

- ◆ Survey of Target Audience (documentation example - a copy of the survey results)
- ◆ Patient Care Audit (documentation example - a copy of the audit summary)
- ◆ Self Assessment (documentation example - a letter from yourself as well as supporting journal articles)
- ◆ Peer Review Activity (documentation example - a detailed summary of the peer review activity)
- ◆ Request from Experts (documentation example - copies of the written requests received prior to conference planning)
- ◆ Faculty Perception (documentation may include minutes from faculty meetings or other evidence)
- ◆ Health Statistics or Mortality/Morbidity Statistics (documentation would include a copy of these statistics)

Unacceptable Methods for an Educational Need: Physicians need to have CME credits, Physicians will have the opportunity to learn, To have an educational session for physicians.

EDUCATIONAL OBJECTIVES

Interpretation: Educational objectives define the expected outcomes for the learner. The objectives are derived from the overall purpose of the activity. Educational objectives are written statements that describe the learner-oriented outcomes which may be expected as a result of participation in the educational activity. In the case of most continuing education activities these statements describe knowledge, skills, and attitude changes that should occur upon successful completion of the activity and should describe how the practice gap will be addressed.

Miscellaneous: A CME activity that is held weekly or monthly (e.g., grand rounds), may be covered by a single set of program objectives with activity objectives determined ongoing.

Sample objectives

- ◆ Participants will identify strategies to improve patient outcomes in regards to . . .
- ◆ Participants will be able to recognize the clinical implications of . . .
- ◆ Describe the methodology for development of new guidelines or . . .
- ◆ Participants will be able to identify . . .
- ◆ Outline management principles of . . .
- ◆ Participants will be able to list the essential elements of . . .
- ◆ Compare and contrast the appropriate selection and dosing based on . . .

Some Verbs for use in Stating Cognitive Outcomes: Define, list, recall, name, recognize, state, repeat, record, label, discuss, describe, explain, identify, translate, restate, express, estimate, compute, demonstrate, illustrate, perform, apply, use, distinguish, analyze, differentiate, compare, contrast, categorize, classify, outline, diagnose, propose, design, manage, assess, rate, choose, decide.

Unacceptable Educational Objectives: To offer programs on the selected topic. To give area physicians the opportunity to learn from nationally recognized speakers. Goals of the conference and vague statements that do not describe learner-oriented outcomes.

DESIRABLE PHYSICIAN ATTRIBUTES

Interpretation: Desirable physician attributes are characteristics and abilities that have been defined by a variety of sources. Some are general and are desirable of all physicians, and others are specific to various specialties. Examples can be found in Appendix 2. If you draw your answer from a different source, list both the source and the attribute.

Please see Appendix 1 for a more detailed explanation of the relationship between practice gaps, educational needs, objectives, outcomes, and desirable physician attributes.

BROCHURE/FLYER/INVITATION

Rough Draft: A rough draft must be reviewed by the CE Office prior to printing and distribution. The rough draft is not the proof from the printer; it can be as simple as hand written updates to previous versions or MS Word documents, etc.

Final Copy: Do not print the final copies of your materials until CME credit is approved and you receive notification from the CE Office.

Logo: You may not use the WMed logo without our written permission.

Objectives: The defined Educational Objective(s) must be clearly stated in the brochure/flyer/invitation.

Front Cover of Brochure: By applying for CME credit you are asking WMed to become a joint sponsor of the conference. As such, appropriate credit must be included recognizing WMed as the CME provider using the long form of our name (Western Michigan University Homer Stryker M.D. School of Medicine).

Examples:

- CME credit provided by Western Michigan Homer Stryker M.D. University School of Medicine
- 5.5 hours of *AMA PRA Category 1 Credits™* provided by Western Michigan University Homer Stryker M.D. School of Medicine

Please note that *AMA PRA Category 1 Credits™* is trademarked. At any time it is used, it must be italicized and followed by the trademark symbol (™).

Prohibited: Statements such as “CME credit has been applied for” or “CME credit pending” on the brochure or other conference promotional materials is prohibited.

Accreditation Statement: The following statement must be included on the brochure/flyer/invitation/internet:

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 Western Michigan University Homer Stryker M.D. School of Medicine and (name of nonaccredited provider). Western Michigan University Homer Stryker M.D. School of Medicine is accredited by the ACCME to provide continuing medical education for physicians.

Western Michigan University Homer Stryker M.D. School of Medicine designates this live activity for a maximum of ____ *AMA PRA Category 1 Credit(s)™*. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

Your approval letter will include a copy of the accreditation statement exactly as it should appear on the brochure/flyer/invitation/internet for your activity. You may use the above in creating your draft brochure/flyer/invitation/internet, but you should use what is included in your approval letter for the final brochure/flyer/invitation/internet.

ONLINE REGISTRATION

Many courses have a pre-registration requirement. Online pre-registration is available through the CE website. If you select “yes” on your application, the CE Coordinator will contact you to go over the process and how registration fees (if any) will be handled. You will be sent the direct link to your course’s registration page to use on your website.

The fee for the use of this service will be established on a case by case basis. Criteria for determining the fee may include, but is not limited to, who the joint provider is, whether or not there is commercial support, and the size and scope of the activity; however, the fee for this service (if any) is mainly dependent on whether or not registration fees will be processed by WMed.

This service is not available for RSS.

CONFERENCE PLANNING SERVICE

The CE Office is available to assist in the planning and implementation of courses. This may include brochure production and mailing/advertising, program preparation, pre- and on-site registration, fiscal functions, and hotel negotiations. This service is not available for RSS.

The fee for the use of this service will be established on a case by case basis. Criteria for determining the fee may include, but is not limited to, who the sponsor is, whether or not there is commercial support, and the size and scope of the activity.

If you indicate that you wish to use this service, the CE Coordinator will contact you to go over details, fees, and to begin the planning process.

UPON APPROVAL

If the application is approved by the CE Director or CE Committee, the CE Office will notify the applicant via an approval form. On the approval form it will state the number of credit hours the program is approved for as well as any stipulations of the approval. CME credit can be withdrawn if you do not comply with the policies in this application or the stipulations on the approval form. After the application is approved, the applicant will be expected to follow through with all aspects of the Conflict of Interest policy.

Important Note:

The WMed CE Office reserves the right to revoke credit at any time, including after an activity has occurred, should the activity and its planners fail to comply with these policies and any additional requirements listed in the approval form.

REQUEST FOR MORE INFORMATION

Upon initial review, more information may be requested to support your practice gap analysis or needs assessment. You will receive an email with specific questions. Your application will be kept on file. In providing the additional information requested, you should type it as an addendum to your initial application. You do not need to submit a new application.

DISAPPROVAL

If your application is not approved, you will receive written notification and a refund of your application fee.

WITHDRAWAL OF APPLICATION

If the applicant withdraws the application then a 50% refund of the application fee will be made.

EVALUATIONS & CERTIFICATES OF ATTENDANCE

Attendees must complete an evaluation form in order to receive CME credit. These evaluations are done electronically through the WMed website. They can be accessed by going to <http://cmetracker.net/WUMED/Login?FormName=getCertificate>. The online evaluation form is available starting at the beginning of the CME activity and for 30 days following. Once the form has been submitted, the attendee is taken to a page where they attest to the number of hours they

attended, after which a certificate of attendance is generated that they may choose to print or save for their records. After the evaluation has closed, the CE Office will email the joint sponsor a copy of the evaluation report.

Alternate Routes to the Evaluation Forms

- From the CME page (<http://med.wmich.edu/education/cme>): Click on “Evaluation Forms”.
- From the WMed home page (<http://med.wmich.edu/>): Click on “Education”, “CME” and then “Evaluation Forms”. Alternatively, click on “Quick Links”, “CME”, and then “Evaluation Forms”.