## Center for Continuous Professional Development Continuing Medical Education

# POLICIES

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### **MISSION STATEMENT**

"The mission of the Continuous Professional Development (CPD) Program at the University of Cincinnati is to improve the quality of patient health by developing and implementing strategies to identify and narrow gaps between current and optimal clinical performance and patient outcomes. Additionally, as an integral part of an Academic Medical Center, the Continuous Professional Development Program will support the institutional mission of training health care professionals to provide personalized care embracing best clinical practices, innovative interdisciplinary research, premier clinical and scientific training, and create community partnerships."

#### EXPECTED RESULTS AND MEASURING OUTCOMES

A critical element of the UC CPD Program is a systematic assessment of the outcomes of educational activities and the overall Program. The Center for CPD will utilize strategies to measure the outcomes of educational initiatives, including both certified activities and adjunctive activities designed to change participant behavior and, ultimately, improve patient outcomes. Where possible, we will directly assess patient care indicators or other data that will provide objective insight into the impact of our educational activities on physician behavior change. We will evaluate individual activities using methods that encourage learner self-assessment and self-directed decisions to make changes and improvements in practice, and follow up periodically with the learners to reinforce learning and document improvement. We will utilize evaluation strategies that provide assessment data to measure the impact of our overall CPD Program.

#### MISSION STATEMENT REVIEW AND APPROVAL

Mission Statement was proposed to and approved by the Continuous Professional Development Advisory Group of the University of Cincinnati, updated Fall 2020.



### COMMUNICATIONS WITH GRANTORS POLICY

The University of Cincinnati's Center for Continuous Professional Development has established a policy of supporting clear and professional communications between the Center, its educational partners, and all Grantors, including public and private, government, foundation, and commercial entities regarding continuing education/professional development proposals and funding opportunities.

The University of Cincinnati Center for Continuous Professional Development confirms that UC, as the accredited provider, retains full control of and responsibility for the design, planning, and implementation of all CPD/CME learning activities provided and certified by the University of Cincinnati.



### CONFLICT OF INTEREST DISCLOSURE AND RESOLUTION POLICY

As a CME provider accredited by the Accreditation Council for Continuing Medical Education (ACCME), the University of Cincinnati (UC), must ensure balance, independence, objectivity and scientific rigor in all CME activities provided by UC. The content and format of CME activities should address the professional practice gaps and educational needs of physicians and, ultimately, promote improvement in the quality of health care. Therefore, UC must ensure that all CME activities and materials provided by UC are free of commercial bias and do not advance the financial interests of any commercial entity or individual instructor.

To that end, UC requires all prospective faculty and planners of a CME activity to disclose in advance any financial relationships they have with the commercial supporters of an activity or with any commercial entity whose products or services may be discussed in that activity. Such information ultimately is shared with prospective learners. During the process of planning a CME activity, the accredited provider (UC) and, when applicable, its educational partner, use disclosure information to determine if prospective faculty members and course planners have financial interests which may, in the context of a given CME activity, present a conflict of interest. A conflict of interest exists when an individual has an *opportunity* to affect CME content regarding the products, services or devices of a commercial interest with which the individual has a financial relationship. Such relationships do not necessarily prohibit an individual from participating in a CME activity; however, they do require the CME provider to actively resolve potential conflicting interests, as mandated by the ACCME.

There are various ways to resolve these conflicts, and, because UC is committed to retaining faculty members whose skills, expertise and reputation are vital to the success of its CME activities, every effort is made to identify conflicts and reach a resolution that honors the accreditor's requirements as well as the interests of the learners. When a prospective faculty member discloses a significant relationship, the CME provider and its planning partner assess how that relationship might affect the content of an activity or compromise its objectivity. Educational objectives are developed for that faculty member's presentation, allowing for a discussion that may include, for example, a review of current literature, recent clinical trial data, evidence-based application of that data, the pathogenesis and pathophysiology of particular disease states, and the mechanics or pharmacokinetics of devices or agents. Discussions that include specific therapeutic recommendations that are inconsistent with the best available evidence, have not been subjected to peer-review, or presentations of selective data which favor

therapeutic agents or devices manufactured by a commercial entity that is supporting a CME activity or with whom a speaker has a financial relationship will not be allowed. As part of the process of ensuring compliance with conflict of interest regulations, the CME provider will, when appropriate, review prospective course materials prepared by faculty members. The intent is not to challenge the faculty member's scientific expertise, but, rather to make certain that slides and handout materials do not contain trade names or references that might, in *the context of that presentation*, create the appearance of bias in favor of a particular product or proprietary therapeutic regimen.

The University of Cincinnati is aware that context is one of the major considerations when assessing potential conflicts of interest. A speaker may have a significant relationship with a particular commercial entity or make references that, out of context, might create an appearance of bias. If it were determined, however, that in the context of the activity, the relationship had no inherent bearing on the content, or that the references were integral to the learners' educational experience, the circumstances would be noted and the potential conflict would be considered resolved. The University of Cincinnati is committed to resolving all potential conflicts of interest. However, if a faculty or planning committee member has substantial financial interests that cannot be reconciled with the goals and integrity of the CME activity, UC reserves the right to prohibit that individual from participating in the activity.



### FIREWALL POLICY

The University of Cincinnati College of Medicine operates under the umbrella of the State of Ohio. The University of Cincinnati is accredited by the Accreditation Council for Continuing Medical Education to provide continuing education for physicians and, as such, directly and jointly provides only certified continuing medical education activities. The University of Cincinnati College of Medicine does not conduct any promotional education activities.

In keeping with this policy, and in compliance with the Accreditation Council for Continuing Medical Education's Standards for Commercial Support, the University of Cincinnati is in full control of the content of all educational activities it sponsors. The University of Cincinnati and its educational partners make all content decisions, without influence from commercial supporters.



### **GRANTOR ATTENDEE POLICY**

- 1. The University of Cincinnati will allow representatives from Grantors to attend CME activities, in reasonable (five or fewer) numbers, as long as space allows. The needs of the CME learners must always come first.
- 2. Grantor representatives are invited to listen to the proceedings of the activity for their personal educational information, and may not interject comments or questions during the educational activity.
- 3. No discussion of promotion or off-label uses may be conducted by grantor representatives within the CME activity.
- 4. Attendance at the activity is not tied to any support, promotional or exhibiting opportunity.



### HONORARIUM POLICY

Individuals who agree to participate as faculty/staff/planners/reviewers in educational programs provided by the University of Cincinnati's Center for Continuous Professional Development (CCPD) may be compensated for their time and may also receive reimbursement for reasonable travel and other out-of-pocket expenses. It is the responsibility of Center for Continuous Professional Development, in consultation with course/activity directors, to set and approve honoraria for all faculty/authors/planners/reviewers participating in continuing medical education (CME) activities provided by the University of Cincinnati.

It is the policy of the CCPD to provide reasonable honoraria to non-University of Cincinnati faculty and staff when possible. Faculty and staff of the University of Cincinnati may also receive honoraria if participation in a UC CME/CPD activity is beyond the regular and expected responsibilities of their employment with the university. In exceptional cases, the honoraria may significantly exceed the usual honoraria range. In these situations, the proposed honorarium must be reviewed and approved by the Associate Dean for Continuous Professional Development.

All honoraria will be paid by the University of Cincinnati or an educational partner expressly authorized by the UC Center for Continuous Professional Development. Under no circumstances can honoraria be paid to speakers/faculty by commercial entities. No other payment shall be given to faculty or authors beyond the approved honoraria and reimbursement of travel and outof-pocket expenses.



### MANAGING CHANGES OF SCOPE AND DATES FOR FUNDED ACTIVITIES

#### DEFINITIONS

**Changes of Scope (COS)** are changes to major content in an activity after the proposal has been funded, including increase of content (when extra funds received), or reduction of content (when fewer funds received).

**Changes of Date (COD)** are changes to live presentation or endured release/end dates for activities due to delays.

#### MANAGEMENT OF CHANGES OF SCOPE

Once an activity achieves full funding but some element of the original proposal requires a change, or sufficient partial funding that the activity can be produced in a reduced or altered manner from the original proposal, UC CME will contact all funders and provide information related to the planned changes from the original scope of the project. The intent is to inform funders of the changes and ensure that they agree to the changes being proposed.

#### MANAGEMENT OF CHANGES OF DATE

Once an activity achieves full funding or sufficient partial funding to carry on, but the original dates of delivery need to be altered or updated, UC CME will contact funders with the revised date(s) for the activity. This should be done as soon as new dates are confirmed. The funders can usually change the dates in their online systems in order for any reminders or other messages can be sent on the correct dates. This will avoid confusion for all concerned.

#### HOW THESE CHANGES WORK WITH THE FUNDERS

Some funders require that we complete a change of scope form, which they either send to us when we inform them that there is a change, or which is available on their web site. Other times, funders will unlock our original proposal on their website and ask us to go in and update the dates or other information (location, title, etc.). Typically, the CME Director asks the educational partner to make these edits, since they know exactly what their dates/explanations should be.

*Note:* Not all changes of scope will be accepted by the funder, in which case we need to return their funds as soon as possible. Changes of date are not usually a problem.

#### FUNDER REQUESTS FOR STATUS REPORTS WHEN FULL FUNDING HAS NOT BEEN ACHIEVED

Often a proposal will receive partial funding and is awaiting decisions from other submissions. For some of our partners/proposals, this can take a good deal of time (as much as 6 months or more). Funders like to know the status of projects they have funded on a periodic basis and will request reports. It is important, if the project has not started as planned due to insufficient funding, to inform the funders that we are awaiting responses from other potential funders. Usually, the funders are content with this explanation and will wait. Once full funding is achieved, it is imperative to let all funders know of revised dates and any other changes, and receive their acknowledgement/agreement before moving forward. Always get their approval in writing via email in order to have approval evidence on file.



### **REFUND POLICY**

Refunds will follow the policy of the CME activity as published in promotional materials and on the <u>https://uc.cloud-cme.com</u> website for each individual activity.

If there is no published activity refund policy, then the UC-CME refund policy will prevail: refunds will be allowed up to 3 days prior to the activity.

Credit card transactions cannot be refunded or adjusted after 12 months past the initial transaction date.

Exceptions: Providership Fees are non-refundable. Fees will be held on account for one year, from the date of the original (cancelled) activity, toward a future activity.

Rush LOA fees and physician reviewer fees are also non-refundable. Exhibit fees will be refunded only if authorized by the activity manager.

To request a refund or to cancel, contact us at <u>uc-cloudcme@ucmail.uc.edu</u>. Your refund will be made to the same credit card to which the original purchase was charged.

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