

Corewell Health Southeast Michigan Department of Continuing Medical Education, hereinafter referred to as CHSeM CME, is jointly accredited by the Accreditation Council for Continuing Medical Education (ACCME), the Accreditation Council for Pharmacy Education (ACPE), the American Nurses Credentialing Center (ANCC), the Association of Social Work Boards (ASWB), the American Psychological Association (APA), and the Commission on Dietetic Registration (CDR) to provide continuing education for the healthcare team. In addition, CHSeM CME is accredited by the American Osteopathic Association (AOA) to sponsor continuing medical education (CME) for physicians. CHSeM CME is the administrative unit responsible for ensuring compliance with Joint Accreditation [Criteria](#) and [Standards for Integrity and Independence in Accredited CE](#), the AOA [Accreditation Requirements for Category 1 CME Sponsors](#), and any other regulations and laws as they relate to the provision of accredited CE.

General Definition of Acceptable Content for Accredited CE

Accredited CE is defined as “educational activities which serve to maintain, develop, or increase the knowledge, skills, or professional performance and relationships that a healthcare provider uses to provide services for patients, the public, or the profession.”

Accredited CE is developed and implemented for the purpose of increasing healthcare provider competence (knowledge/skills) and performance to improve patient outcomes.

Accredited CE must not be utilized as a mechanism to induce referrals to the hospital or health system.

Requirements for Accredited CE

Activities that are accredited for CE must:

- Incorporate the educational needs that underlie the practice gaps of the healthcare team and/or the individual providers’ knowledge, skills/strategy, or performance as members of the healthcare team.
- Be designed to change skills/strategy, or performance of the healthcare team/provider, and/or patient outcomes.
- Be designed around valid content (see “Validity of the Content of Accredited CE” below).
- Promote active learning consistent with the desired results of the activity.
- Be developed in the context of desirable attributes/core competencies (e.g., ABMS/ACGME, IOM, Healthcare Team, ANCC, CAPE, etc.).
- Utilize support strategies to sustain change as an adjunct to its educational interventions (e.g., reminders, toolkits, additional resources, etc.).
- Implement strategies to remove, overcome, or address barriers to change in the skills/strategy or performance of the healthcare team/provider.
- Analyze changes in the skills/strategy, performance, and/or patient outcomes.
- Comply with the [Standards for Integrity and Independence in Accredited CE](#), including ensuring content is valid; preventing commercial bias and marketing; identifying, mitigating, and disclosing relevant financial relationships; managing commercial support appropriately; and managing ancillary activities offered in conjunction with accredited CE.

Table of Contents

| | |
|---|----|
| Validity of the Content of Accredited CE..... | 3 |
| Areas of Content Review..... | 3 |
| Communication of Content Validity Policies | 4 |
| Maintenance of Documentation..... | 4 |
| Prevention of Commercial Bias and Marketing..... | 4 |
| Identify, Mitigate, and Disclose Relevant Financial Relationships..... | 4 |
| Collection and Identification..... | 5 |
| Owners or Employees of Ineligible Companies | 5 |
| Mitigation..... | 5 |
| Mitigation of Relevant Financial Relationships Actions | 6 |
| Situations where Relevant Financial Relationships cannot be Effectively Mitigated:..... | 7 |
| Disclosure of Relevant Financial Relationships to Learners..... | 7 |
| Manage Commercial Support Appropriately..... | 8 |
| Decision Making and Disbursement..... | 8 |
| Agreement..... | 8 |
| Accountability and Management of Funds | 8 |
| Disclosure to Learners | 8 |
| Manage Ancillary Activities in Conjunction with Accredited CE | 9 |
| Meals, Social Events, and Gifts..... | 10 |
| Activity Participants' Meals..... | 11 |
| Faculty Appreciation Meals | 11 |
| Social Events..... | 11 |
| Gifts to Healthcare Providers..... | 11 |
| Advertising and Promotion of Accredited CE..... | 12 |
| Required Elements for CME/CE Promotional Materials. | 12 |
| Freedom from Commercial Marketing or Product Messaging | 12 |
| No Promotion by Ineligible companies. | 12 |
| Emphasis on Educational Content. | 12 |
| Required Elements for CME/CE Promotional Materials | 13 |
| Payment of Honoraria and Reimbursement | 13 |
| Non-Employed Physicians | 14 |
| Collaboration & Partnership | 14 |
| Regularly Scheduled Series (RSS) | 15 |
| Emergencies/Disasters | 16 |
| Grievance Policy | 16 |

Validity of the Content of Accredited CE

The review and validation of the content of accredited CE is critical to assuring the public and learners that the education is fair and balanced and that any clinical content presented supports safe, effective patient care.

The following principles shall apply to the process of validating accredited CE content:

- All recommendations for patient care in accredited CE must be based current science, evidence, and clinical reasoning, while giving a fair and balanced view of diagnostic and therapeutic options.
- All scientific research referred to, reported, or used in accredited CE in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection, analysis, and interpretation.
- Accredited CE cannot advocate for unscientific approaches to diagnosis or therapy, or promote recommendations, treatment, or manners of practicing healthcare that are determined to have risks or dangers that outweigh the benefits or are known to be ineffective in the treatment of patients.
- For accredited CE that will discuss, debate, and/or explore new and evolving topics:
 - The content must be prospectively reviewed by CHSeM CME staff and/or committee members and the review must be documented. The review must be completed independent from the influence of the activity planner or faculty.
 - These areas must be clearly identified as new and evolving within the program and individual presentations.
 - Engagement with these topics must be facilitated without advocating for, or promoting, the practices that are not, or not yet adequately based on current science, evidence, and clinical reasoning.

Areas of Content Review

Five areas should be included in the content review, including:

1. **Review for Fair Balance**—Is the content balanced among various options available for treatment and not biased toward a product or manufacturer? Pros and cons should be analyzed and reflected in the content, and the content should be based on a need related to physician competence, practice performance improvement, or increased quality in patient care rather than on a product.
2. **Patient Treatment Recommendations**—Are the patient treatment recommendations contained in the content evidence-based? Are the treatment recommendations appropriate for the target audience? Do the patient treatment recommendations contribute to overall improvement in patient care?
3. **Scientific Validity**—Do scientific studies cited in this activity conform to standards accepted by the scientific community?
4. **Learning Objectives**—Does the educational content support the learning objectives of the activity? Are the objectives stated in terms of performance-in-practice and are they actionable and measurable?
5. **Omission and Commission**—Do any slides or materials need to be deleted? Are there any studies, data, or best evidence that is missing?

Communication of Content Validity Policies

The CME director or designee will be responsible for providing clear directives to faculty on content validity policies and procedures. The principle method of communication is the Disclosure of Financial Relationships form, which includes information on the definition of accredited CE, evidence-based content, fair balance and scientific objectivity.

Maintenance of Documentation

The CME director or designee shall ensure the files for each activity include documentation that a content review was completed, the recommendations made by the reviewer, and evidence that any necessary changes requested by the reviewer were implemented.

Prevention of Commercial Bias and Marketing

Accredited CE must protect learners from commercial bias and marketing.

1. CHSeM CME must ensure that all decisions related to the planning (including identification of educational needs and practice gaps, competencies to be addressed, objectives), faculty selection (including planners and presenters/authors), delivery, and evaluation of accredited CE are made without any influence or involvement from the owners and employees of an [ineligible company](#)¹.
 - a. Requests for “technical review” of content of the accredited CE activity by an ineligible company will not be accepted.
2. Accredited CE must be free of marketing or sales of products or services. Faculty must not actively promote or sell products or services that serve their professional or financial interests during the accredited CE.
3. The names or contact information of learners is the confidential property of Corewell Health Southeast Michigan and cannot be shared with any [ineligible company](#) or its agents without the explicit consent of the individual learner.

Identify, Mitigate, and Disclose Relevant Financial Relationships

Many healthcare professionals have financial relationships with ineligible companies; these relationships must not be allowed to influence accredited CE. CHSeM CME is responsible for identifying *relevant financial relationships* between individuals in control of accredited CE content and ineligible companies – AND – managing these relationships to ensure they do not introduce commercial bias into the education. Financial relationships of any dollar amount are defined as relevant if the educational content is related to the business lines or products of the ineligible company.

¹ An [ineligible company](#) is defined as a company ***whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.*** Organizations whose mission and function are (1) providing clinical services directly to patients; or (2) the education of healthcare professionals; or (3) serving as fiduciary to patients, the public, or population health are not considered to be ineligible.

Collection and Identification

CHSeM CME must collect information from all planners, faculty, and others in control of educational content about **ALL** of their financial relationships with ineligible companies within the **PRIOR 24 MONTHS**. There is **no minimum financial threshold**. All financial relationships with ineligible companies, regardless of the amount or the individual's view of the relevance of the relationship to the educational content must be disclosed. Collection of financial information will be conducted through the CHSeM CME Disclosure of Financial Relationships Form.

The Disclosure of Financial Relationships form must be completed by:

1. CHSeM CME staff and committee members – annually or as relationships change.
2. Course Directors and Planning Committee Members – at the initiation of the planning process and prior to approval of CME/CE credit.
3. Faculty (speaker, moderator, panelist, author) – during content development/prior to the presentation.

Disclosure information must include both the name of the ineligible company with which the person has a financial relationship and the nature of the financial relationship.

Owners or Employees of Ineligible Companies

Individuals who are owners or employees of ineligible companies must be excluded from controlling content or participating as planners or faculty in accredited CE unless:

- a. The content they are involved with planning and/or presenting is NOT related to the business lines or products of their employer/company;
- b. The content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations; or
- c. When they are participating as technicians to teach the safe and proper use of medical devices and do NOT recommend whether or when a device is used.

All identified relationships will be reviewed and CHSeM CME staff will utilize our **Mitigation Process** to determine which relationships are relevant to the content being planned/presented (financial relationships are considered to be relevant if the content the individual is in control of is related to the business lines or products of the ineligible company). Relationships that are determined to be relevant will require additional steps to ensure commercial bias is not inserted into the content.

Mitigation

CHSeM CME will take steps to mitigate relevant financial relationships prior to the individuals assuming their roles. The process to mitigate relevant financial relationships for individuals in control of the content must be conducted independent from the influence of the activity planners and faculty; to ensure independence, the mitigation process will be conducted by CHSeM CME staff, a member of the CME/CE Committee, or an independent reviewer selected by CHSeM CME.

Mitigation of Relevant Financial Relationships Actions

CME/CE Staff, Committee Members, and Independent Reviewers of Content: Content will only be reviewed by staff, committee members, or independent reviewers who have no relevant financial relationships.

Course Directors and Planning Committee Members: A Mitigation of Relevant Financial Relationships Form must be completed by the course director/planner with the identified relationship(s) prior to the activity being reviewed and approved for CME/CE credit. CME staff will review the completed mitigation form in addition to all planning documents, identified speakers, and topics to ensure that speakers and topics represent a balanced, evidence-based approach.

As part of the mitigation process, CHSeM CME may require another faculty member with no relevant relationships to assist with the planning to ensure independence, the course director or planning member may be required to be replaced, or the application for CME/CE credit may be denied.

Faculty, including Speakers, Moderators, Panel Members, Authors: If there is no physical content (i.e., no presentation slides) to be reviewed, the individual must complete the Mitigation of Relevant Financial Relationships form at least 1 week prior to the commencement of the accredited CE activity. CME staff or a committee reviewer will review the completed mitigation form and obtain evidence that the topics represent a balanced, evidence-based approach. If there is physical content (i.e., presentation slides) available to be reviewed, the individual must submit the content at least 1 week in advance for review and mitigation. A mitigation of relevant financial relationships form will be completed by the CME staff or committee member to document the mitigation process and results of the review.

If a conflict of interest or bias is detected within the content, the individual in control of content is expected to modify the content, the content will be modified by CME/CE staff/committee member, or the individual may be replaced. If the relationship is unable to be mitigated, the content is unable to be modified or the individual refuses to modify the content, the individual will not be allowed to continue in the role or CME/CE credit will be eliminated* from their involvement.

*If CME/CE credit is removed for any lecture or portion of an accredited activity due to unmitigated relevant financial relationships, and the lecture/activity will still be delivered, the following will be enforced:

1. Non-accredited CE lectures must be clearly labeled and communicated as non-accredited to learners.
2. Non-accredited CE lectures that are presented live (either in-person or virtually) must not occur in the educational space (i.e., CME/CE space) within **30 minutes before or after** an accredited CE lecture.
3. Pre-recorded/enduring non-CME/CE lectures must be kept separate from accredited CE lectures. Learners must not be forced to view non-accredited lectures.

Situations where Relevant Financial Relationships cannot be Effectively Mitigated:

CHSeM CME strives to ensure independence from ineligible companies in all aspects of the Accredited CE activity, including the planning, development, implementation, and evaluation of accredited CE. There are some situations where relevant financial relationships may not be effectively mitigated. In these situations, CME/CE credit will not be provided to individual presentations and/or entire activities. Examples of these situations, include, but are not limited to:

- Short planning timeframes that do not permit adequate planning and implementation of required CHSeM and/or CE accreditation standards, criteria, and policies;
- Requests for CME/CE certification for content that is already fully developed;
- Inappropriate processes in educational planning and/or management that are not consistent with CHSeM and/or CE accreditation policies and procedures; and
- Individuals, regardless of their role in the activity, who are an owner or employee of an ACCME-defined ineligible company UNLESS:
 - The content they are involved with planning and/or presenting is NOT related to the business lines or products of their employer/company;
 - The content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations; or
 - When they are participating as technicians to teach the safe and proper use of medical devices, and do NOT recommend whether or when a device is used.

Disclosure of Relevant Financial Relationships to Learners

Relevant financial relationships must be disclosed to the audience for all individuals involved with the content of the activity and must include each of the following:

- a. The names of the individuals with relevant financial relationships.
- b. The names of the ineligible companies with which they have relationships.
 - Disclosure to learners must include the ineligible company's name only and must not include corporate or product logos, trade names, or product group messages.
- c. The nature of the relationships (i.e., consultant, royalties, research grant, etc.)
- d. A statement that all relevant financial relationships have been mitigated.

Disclosure to learners must also include those who are in control of content who do not have relevant financial relationships with ineligible companies.

This acknowledgment/disclosure must be done before the learner engages with the accredited CE. For example, this may be accomplished through a registration confirmation, notice of the meeting, handout material, activity syllabus, opening PowerPoint slide, advance email to registered participants, etcetera.

Manage Commercial Support Appropriately

Commercial Support is defined as financial or in-kind support from ineligible companies.

For accredited CE that receives commercial support, CHSeM CME is responsible for ensuring that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. The support *does not* establish a financial relationship between the ineligible company and planners, faculty, or others in control of the content of the education.

Decision Making and Disbursement

CHSeM CME must make all decisions regarding the receipt and disbursement of commercial support.

- a. Ineligible companies cannot pay directly for any expenses related to the education or the learners of the accredited CE activity.
- b. Commercial support may be used to fund honoraria or travel expenses of planners, faculty, or others in control of the content for those roles only.
- c. Commercial support must not be used to pay for travel, lodging, honoraria, or personal expenses for individual learners or groups of learners in accredited CE.
- d. Commercial support may be used to defray or eliminate the cost of the education for *all* learners.

Agreement

The terms, conditions, and purposes of the commercial support (both financial and in-kind) must be documented in an agreement between the ineligible company and CHSeM CME. The agreement must be fully executed prior to the start of the accredited education.

Accountability and Management of Funds

CHSeM CME must control all aspects of the management of funds from an ineligible company. The ineligible company must not pay directly for any expense associated with the accredited CE activity. No pharmaceutical samples or gifts of any kind will be allowed in connection with accredited CE activities.

Disclosure to Learners

Acknowledgement/disclosure of commercial support (both financial and in-kind) must be made to learners. Disclosure of commercial support to learners:

- a. Cannot occur unless a fully executed letter of agreement is in place between the ineligible company and CHSeM CME;
- b. Must include the name(s) of the ineligible company(ies) that gave the commercial support and the nature of the support (if it was in-kind); and
- c. Be made prior to the learners engaging in the education.

Disclosure of commercial support may include the name, mission, and areas of clinical involvement, but **must never include corporate or product logos, slogans, trade names or product-group messages** of an ACCME-defined ineligible company.

Manage Ancillary Activities in Conjunction with Accredited CE

CHSeM CME is responsible for ensuring that education is separate from marketing by ineligible companies – including advertising, sales, exhibits, and promotion – and from non-accredited education offered in conjunction with accredited CE.

Ineligible companies may be invited to market or exhibit materials relevant to the subject of the meeting. Corewell Health Southeast Michigan reserves the right to deny the request of service to any company that may be in conflict with the interests of our organization.

Arrangements that allow ineligible companies to market or exhibit in association with accredited CE must not:

- Influence any decisions related to the planning, delivery, or evaluation of the education.
- Interfere with the presentation of the education.
- Be a condition of the provision of financial or in-kind support from ineligible companies for the education.

Opportunities to market or exhibit must incur a fee; fees collected for these promotional functions are not considered “commercial support” and must be kept separate.

- Promotional fees shall be approved by CHSeM CME prior to solicitation
 - All companies must be charged a fee to market or exhibit; fees shall not be waived for any company.
 - Different fee amounts can be set based on amount of space (i.e., 3’ table vs. 6’ table), organization type (i.e. for-profit vs. not-for-profit), available offerings. All fee options must be made available to all companies.
- All promotional fees must be paid with the full knowledge and approval of CHSeM CME. No other funds from the company will be paid to the activity administrator, speaker or others involved with the activity.
- All promotional opportunities require an agreement to document the terms, conditions and purposes of the contribution.

Learners must be able to easily distinguish between accredited education and other activities.

- Marketing, exhibits, and non-accredited education developed by or with influence from an ineligible company or with planners or faculty with unmitigated financial relationships **must not occur in the educational space within 30 minutes before or after a live accredited CE activity.**
- Learners must not be presented with marketing while engaged in the accredited education activity.
- Learners must be able to engage with the accredited education without having to click through, watch, listen to, or be presented with product promotion or a product-specific advertisement.

- Advertisements or promotional materials must not be visible at the same time as the accredited education. There must not be any “commercial breaks”.
- Activities that are part of the event but are not accredited for CE must be clearly labeled and communicated as such.
- Educational materials that are part of accredited education (such as slides, abstracts, handouts, evaluation mechanisms, or disclosure information) must not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages. Information distributed about accredited education that does not include educational content (such as logistical information) may include marketing by or for an ineligible company.
 - CHSeM CME must review and approve all educational and non-educational content prior to distribution to ensure compliance.
- Ineligible companies may not provide access to, or distribute, accredited education to learners.

Special acknowledgement of exhibitors is not required but is permissible. Acknowledgement of exhibitors may state the name, mission, and areas of clinical involvement of an ineligible company but **may not include corporate logos and/or slogans** if the acknowledgement is being made within the space or educational materials of the accredited CE activity.

CHSeM CME does not permit subtle advertising in conjunction with accredited CE by having book bags, pens, or other accoutrement that bears the name of the ineligible company or its products.

Company representatives, if invited, may attend accredited CE activities discreetly for their own education, but may not interact with attendees in any way that might be interpreted as marketing nor may they participate in any discussion within the space of the educational activity.

Information on the identity of learners at accredited CE activities is the confidential property of CHSeM CME and is used for accreditation/credit-related purposes. Names or contact information of learners will NOT be released to third parties without the explicit consent of the individual learner.

Meals, Social Events, and Gifts

Modest meals and social events may accompany an accredited CE activity, but commercial “sponsorship” is prohibited, and employees of an ineligible company may not attend except as paid registrants of the accredited CE activity. Any meals or social events provided in connection with an accredited CE activity shall not compete for time or space with or take precedence over the educational event. Gifts must not be provided to conference attendees but may be provided to conference planners or speakers in lieu of an honorarium. Gifts must be modest (<\$100 per person) and should be educational in nature. All gifts must be prospectively approved.

Travel and incidental expenses (individual airfare, lodging, ground transportation, and meals other than described above) for any family member/travel companion are not allowed as an expense for an accredited CE activity under any circumstance.

Activity Participants' Meals

Meals provided for activity participants during the course of an accredited CE activity are allowed for the purpose of promoting interaction and exchange between faculty and learners as long as they are modest in scale (less than \$100 per person) so as not to take precedence over the educational event. Additionally, they must be appropriate for the educational setting in which the activity takes place and be open to all participants of the accredited CE activity. These meals may be paid for either through tuition revenue, educational grants, or promotional funds (i.e., exhibit fees) received from ineligible companies. If meals will be paid for using educational grants or promotional funds from ineligible companies, there must be more than 50 physicians in attendance and the meal must be a buffet meal, snack, soft drink, or coffee made available to all participants in order to comply with reporting requirements of the Physician Payment Sunshine Act. If fewer than 50 physicians are in attendance, meals must be paid for from alternate income sources.

Faculty Appreciation Meals

CHSeM CME allows faculty dinners held in appreciation for faculty participation in an accredited CE activity (in lieu of honoraria payments). Additionally, faculty dinners constitute a legitimate business meal expense if business regarding the Accredited CE activity is discussed during the dinner; there must be a specific business purpose for non-faculty to participate in a business meal. Commercial support funds may not be used for business meals for non-faculty.

Social Events

Social events must not compete for time or space with or take precedence over the educational event. The social event should not be made a major highlight of the promotional brochure. Spouses, partners, children or guests of faculty or participants may not attend the social event unless a separate fee is charged.

Gifts to Healthcare Providers

Gifts of any type distributed to attendees of educational activities by ineligible companies give the appearance of creating a conflict of interest. No gifts are to be given by ineligible companies to conference attendees, speakers, or planning members before, during or after the event.

Gifts or compensation may not be accepted for simply attending an accredited CE activity, including the defraying of costs (that is, if the individual is not speaking or otherwise actively participating or presenting at the event).

Gifts may be given to faculty, planners, or others involved with the accredited CE activity, but must be modest (<\$100 per person) and should be educational in nature. Gifts can be purchased using registration fees or department funds only; funds from commercial support or promotional exhibits or advertisements cannot be used toward the gift purchase (Physician Payment Sunshine Act); all gifts must be prospectively approved and purchased by Corewell Health. Corewell Health departments must confer with the Corewell Health Compliance department prior to purchasing of any gifts.

Advertising and Promotion of Accredited CE

Brochures and other promotional materials (including websites and email announcements) are an important aspect for the success of an accredited CE event.

Only Limited Promotion Permitted Before Approval of Formal Application.

With the exception of a “save the date” notice, which includes only title, date and location (with no mention of CME/CE credit or CME/CE credit “pending”), no promotion of an accredited CE activity or mention of CME/CE credits may occur until the application for credit has been formally approved by CHSeM CME.

All Promotional Material Must Be Approved by the CHSeM Department of CME.

Before printing, distribution or posting, all promotional materials must be reviewed and approved by CHSeM CME. CME staff will make all efforts to review these materials as quickly as possible. However, the materials will be reviewed on a first come, first served basis; if the materials contain CME/CE related information, approval will not be granted until the activity is formally approved for credits. It is highly recommended that materials be submitted to CHSeM CME no less than two weeks prior to the printing deadline. To reduce editing costs, it is recommended that CHSeM CME be included in the design process of all marketing materials.

If advance approval is not obtained from CHSeM CME and there is an error in, or omission of, any of the required elements of the printed promotional materials, CHSeM CME may require the materials to be reprinted and disseminated with the corrections at the department’s expense. *This includes printed brochures, flyers, announcements (U.S. mailed or emailed), “save the date” cards and/or posting to websites.* Send proposed text and/or preliminary draft materials to your assigned CME/CE coordinator for review and approval.

Required Elements for CME/CE Promotional Materials.

Promotional items must be produced in accordance with all CE accreditation requirements and must be approved by CHSeM CME in advance.

Freedom from Commercial Marketing or Product Messaging.

All materials for CHSeM accredited CE activities, including, but not limited to syllabi, brochures, course web sites, lecture slides, etc. must be entirely free of commercial marketing or product messaging such as logos and slogans.

No Promotion by Ineligible companies.

CHSeM CME/CE activities are not permitted to be marketed on web sites of ineligible companies or marketed by ineligible companies.

Emphasis on Educational Content.

The primary focus of accredited CE-related marketing should be on the educational content. All education-related information should be presented in the front pages of the material.

Required Elements for CME/CE Promotional Materials

This page contains all required and recommended elements for your accredited CE promotional materials. CHSeM CME will work directly off this checklist when reviewing your materials. If a required element is missing, the promotional piece will be returned to you without approval.

All promotional materials must be reviewed and approved by CHSeM CME prior to printing or posting. All promotional materials for CHSeM accredited CE require the following elements unless otherwise stated (see Advertisement Required Elements):

- Title, Date and Location of Activity (on cover of brochure or home page of website)
- Learning Objectives (must match what was included on the CME/CE application; if the objectives have changed since receiving approval, you must notify CHSeM CME of the changes).
- Intended Target Audience
- Activity Agenda with Times, Topics and Speakers
- Cancellation and Refund Statements (CHSeM CME automatically charges a cancellation fee for meetings that have a registration fee managed by CME. This cancellation fee is retained by CHSeM CME).
- Accreditation Statement
- Credit Designation Statement(s)
- Facility and/or Hotel Accommodation Information (recommended)

Payment of Honoraria and Reimbursement

Honoraria and out-of-pocket expenses incurred by faculty will be reimbursed directly by CHSeM or its representative. No other payment from any other source shall be given to the faculty, planners or other individuals involved with the accredited CE activity. The honoraria guidelines must be consistent with the fair market value established by Corewell Health's legal department.

If faculty facilitate or conduct a presentation or session for a portion of an education event, but then participate in the remainder of the educational event as a learner, their expenses can be reimbursed, and honoraria can be paid for their faculty role only.

The provider may not use commercial support to pay for travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of an accredited CE activity. The provider may use commercial support to pay for travel, lodging, honoraria, or personal expenses for faculty, bona fide employees and volunteers of the provider, joint sponsor or educational partner.

Corewell Health departments must work directly with Physician Contracting for any physician who will be paid an honorarium for serving as faculty, planner or other role as part of an accredited CE activity. All honorarium payments for physicians require a contract and approval through the compliance Meditract system.

Non-Employed Physicians

All non-Corewell Health physicians who attend or participate as learners in CHSeM accredited CE activities shall be required to pay an applicable registration fee in an amount equal to the fair market value² of the activity. Such fee shall be inclusive of any food, materials, or other goods, items, or services provided by Corewell Health at the accredited CE activity.

Corewell Health shall not reimburse non-Corewell Health providers for any registration fees, meals, lodging, travel expenses, or any other out-of-pocket costs related to attendance at a CHSeM accredited CE activity.

Exceptions

The reimbursement limitations set forth above shall not apply to any non-Corewell Health physicians who are planning members, speakers or presenters at the accredited CE activity and may receive reimbursement in accordance with applicable policies of Corewell Health for their planner or speaker role.

Corewell Health will not be required to charge a registration fee to non-Corewell Health physicians for any accredited CE activity for which the primary purpose is compliance training.³

Corewell Health will not be required to charge a registration fee for attendance or participation in an accredited CE activity that is wholly funded by commercial support where such support is intended to be used to reduce or eliminate the cost of a registration fee for all participants.

Corewell Health will not be required to charge a registration fee if the education is less than 1 ½ hours in duration, occurs within one of the health system's hospitals, is offered to all medical staff members or those practicing in the same specialty, and relates to the provision of, or is designed to facilitate the delivery of medical services within the health system (i.e., grand rounds, tumor boards, cases conferences, etcetera).

Collaboration & Partnership

CHSeM CME often enters into collaborative educational partnerships with non-accredited organizations, such as medical specialty societies and other non-profit organizations. CHSeM CME must be involved before any major planning occurs for the activity.

If an activity will be seeking commercial support, CHSeM CME will not be involved with an activity if a proposal is submitted for funding prior to being contacted. If changes are made to a proposal (including budget) after CHSeM CME has given approval, the proposal must be resubmitted for review and approval.

² The fair market value range to be used to be compliant with this policy is \$15 to \$30 per CME/CE credit, effective for all CME/CE activities.

³ For purposes of this policy, compliance training refers to training regarding the basic elements of a compliance program, such as establishing policies and procedures, training of staff, internal monitoring, or reporting; specific training regarding the requirements of the Federal and State health care programs (for example, billing, coding, reasonable and necessary services, documentation, or unlawful referral arrangements); or training regarding other Federal, State, or local laws, regulations, or rules governing the conduct of the party for whom the training is provided.

The following is strictly enforced for all collaborative partnerships:

1. An ineligible company cannot take the role of non-accredited partner in a joint-providership relationship.
2. Partnerships must be consistent with CHSeM CME's mission and purpose.
3. CHSeM CME must review and approve all materials associated with the activity prior to their release (including grant submissions); once these materials have been reviewed and approved, no further changes can be made without notifying CHSeM CME.
4. The responsibilities and roles of the partner will be clearly delineated in an agreement between the partner and CHSeM CME.
5. All potential partnerships will be examined on their individual merits. CHSeM CME reserves the right to refuse to enter into a partnership agreement for any reason whatsoever, regardless of that organization's willingness to comply with this policy.
6. CHSeM CME will charge fees for its CME/CE services. These fees and the terms for its payment will be mutually agreed upon and delineated in the aforementioned agreement between CHSeM CME and the partner.

Regularly Scheduled Series (RSS)

A regularly scheduled series (RSS) is defined as the daily, weekly or monthly CME/CE activities that are primarily planned by and presented to the institution's professional staff.

All RSS are expected to be planned, implemented, and evaluated in compliance with the criteria, standards, and policies for accredited CE.

RSS Monitoring and Improvement Plan

All RSS (grand rounds, tumor boards, M&M, journal club, case conference, etc.) meeting documentation must be received by CHSeM CME **no later than three (3) days prior to the meeting date**. If documentation is not received within this time frame, an appropriate intervention will take place as identified below.

- 1st Intervention: communication/education session with department coordinator(s)
- 2nd Intervention: communication/education session with department coordinator(s) and course director(s)
- 3rd Intervention: Withdrawal of CME/CE credits from applicable meeting session(s)
- 4th Intervention: Withdrawal of CME/CE credits from applicable meeting session(s) as well as all remaining meeting sessions in the series through the remainder of the approval period (December 31)

Emergencies/Disasters

The following procedures must be followed in the event an accredited CE may need to be cancelled, the date changed, or the meeting venue changed.

Incident Weather: On the brochure or announcement of a conference that is to be held when weather may be a factor, the potential attendees need to be informed of a phone number they may contact prior to the conference if there is doubt as to whether the conference will be held, postponed or cancelled.

Facility Problem/Natural Disaster: If an activity is to be held at a location outside of the hospital (hotel, conference center, resort, etc.) and the facility is unable to host the activity, either because of a natural disaster or a problem within the facility itself, an attempt should be made by the Department to secure the facility's help in finding another similar location.

Department Responsibilities:

To the best of their ability, it is the responsibility of the Department staff to assure that all registrants, the faculty and anyone else involved are informed of a cancellation, postponement, change of venue or date in as expeditious a manner as possible. The first method of contact should be via telephone, followed up (if there is time) by a written confirmation of the change/cancellation.

If a conference is cancelled, the Department is required to refund any registration fees that have been received as soon as possible and to assure that monetary settlement with the planned facility is carried out in the hospital's best interest. If CHSeM CME is managing registration, CME staff will issue all refunds to registered participants in a timely manner upon written confirmation that the event is being cancelled.

Grievance Policy

If a grievance occurs regarding a Corewell Health Southeast Michigan accredited CE event, the grievance must be submitted in writing to the Director of Continuing Medical Education at brooke.taylor@corewellhealth.org. All grievances will receive an initial response in writing within thirty (30) days of receipt.

The Director of CME will review all grievances and resolve if possible. If no resolution is possible, the Director will then pass the information on to the event planning committee and/or Continuing Education Committee for resolution.