

<b>TITLE</b>	<b>EEH ACME PROGRAM: JOINT PROVIDERSHIP ACTIVITIES POLICY</b>
<b>PURPOSE</b>	<ol style="list-style-type: none"><li>1) To set forth the policy for developing Joint Providership activities that are sponsored or approved by Edward-Elmhurst Health's Accredited Continuing Medical Education Program ("ACME Program").</li><li>2) To comply with the Illinois State Medical Society (ISMS) and the Accreditation Council for Continuing Medical Education (ACCME) Standards for Joint Providership.</li></ol>
<b>APPLICABILITY</b>	Edward-Elmhurst Health
<b>POLICY STATEMENT(S)</b>	<p>The Edward-Elmhurst Health Accredited CME Program shall only provide and award continuing medical education credit for educational activities that: (i) follow the procedures outlined in this policy; and (ii) are approved by the Program &amp; Education Committee; and/or the Chair of the Program &amp; Education Committee; and/or the majority members of the Program &amp; Education Committee. Any activity that fails to comply with the approved standards will be suspended from receiving <i>AMA PRA Category 1 Credit™</i> and held to corrective action. If no corrective action is taken, credit is suspended indefinitely, and the activity planner(s) is not permitted to apply for <i>AMA PRA Category 1 Credit™</i> in the future. Edward-Elmhurst Health is responsible for (1) presenting learners with only accurate, balanced, scientifically justified recommendations, and (2) protecting learners from promotion, marketing, and commercial bias. The solicitation and acceptance of commercial support for the ACME Program is conducted in accordance with this policy and the ACCME Standards for Integrity and Independence in Accredited Continuing Education</p>
<b>DEI STATEMENT(S)</b>	<p>Edward-Elmhurst Health as an institution, and the Accredited CME Program as its supporter, is fighting systemic racism, institutionalized biases, and healthcare inequities. To build a more diverse healthcare community and reduce disparities and injustices in the medical profession, the ACME Program asks that speaker(s), content authors, planners, and others involved in Accredited CME activities are representative of all races, ethnicities, genders, gender identities, sexual orientations, generations, backgrounds. Additionally, the material should be carefully reviewed to reflect linguistically appropriate content, narratives developed with an equitable lens and key terms and concepts used in the context of health equity. When appropriate, conversations on how health equity and DEI+J impact the educational topic should be included.</p>
<b>DEFINITION(S)</b>	<ul style="list-style-type: none"><li>• Accredited CME Activity: An activity sponsored by Edward-Elmhurst Health ACME Department (8681) that is designated for a specified amount of <i>AMA PRA Category 1 credit™</i>.</li><li>• Planner(s): An individual or group of individuals involved in the planning process and implementation, facilitation, or moderation of an accredited CME activity.</li></ul>

- Speaker(s): An individual or group of individuals presenting, speaking, or delivering content at an accredited CME Activity.
- Eligible Organizations: by ACCME definition, eligible organizations are those 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; and other organizations that are not otherwise ineligible. Examples of eligible organizations can be found [here](#).
- Ineligible Organizations: by ACCME definition an ineligible organization is one whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Examples of eligible organizations can be found [here](#).

## PROCEDURE STATEMENT

The Edward-Elmhurst Health (EEH) Accredited CME Program intends to achieve excellence in accredited continuing medical education (ACME) through educational activities built on evidence-based medicine. Edward-Elmhurst Health is accredited by the Illinois State Medical Society (ISMS) to provide *AMA PRA Category 1 Credit™*. The EEH ACME Program will jointly provide CME credit for accurate, balanced, and scientifically justified activities when the mission statement and organizational purpose of the requesting organization, and the goals of the activity are consistent with the EEH ACME mission statement and meet the accreditation criteria of the Accreditation Council for Continuing Medical Education (ACCME) and the Illinois State Medical Society (ISMS).

The content of the Accredited CME activity jointly provided by EEH, and the requesting organization must be educational and serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships a physician uses to provide services for patients, the public, or the profession. The Accredited CME activity must be scientifically sound and based on evidence that is accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients. All scientific research referred to, reported, or used in accredited CME in support or justification of patient care recommendations must conform to the generally accepted standards of experimental design, data collection, and analysis. Activities are not eligible for credit if they present, promote, or recommend, treatments or manners of practicing medicine that are not within the definition of Accredited CME, known to have risks or dangers that outweigh the benefits, or known to be ineffective in the treatment of patients. An activity that is devoted to advocacy of unscientific modalities of diagnosis or therapy is not eligible to apply for joint Providership or credit.

## PROCEDURE

### I. REQUIREMENTS & GENERAL GUIDELINES

The requesting organization must comply with ACCME/ISMS Accreditation Requirements and Standards for Integrity and Independence in Accredited Continuing Education. The goals

and objectives of the partnership with the requesting organization must be clearly stated within the Joint Providership agreement. The content of the educational material must fall within the EEH ACME educational guidelines. Edward-Elmhurst Health will not approve applications for Joint Providership from the following types of organizations:

- Any ineligible companies as defined by the ACCME.
- Medical Education Companies (MECs)

Edward-Elmhurst Health reserves the right to refuse Joint Providership to any organization.

## II. APPLICATION GUIDELINES

Electronic submission of applications and final documentation such as disclosures, presentations, etc. is required through the CloudCME™ portal. Applications and corresponding documentation require a minimum of 4 weeks to process and must be submitted to include the following:

- Application with the required information as follows:
  - ✓ Type of course
  - ✓ Date/Time/Location
  - ✓ Activity Description
  - ✓ Need/Gap Analysis
  - ✓ Number of Credits Requested (*must correspond with hours of education*)
  - ✓ Target Audience
  - ✓ Planners and Faculty Information (*including email, phone number and credentials*)
  - ✓ Barriers to Learning (*Provider, Team, Patient, Organization*)
  - ✓ Objectives (*Minimum of 3 using Blooms Taxonomy*)
  - ✓ Outcomes Data Measurement (*What documentation will be provided?*)
  - ✓ Competencies Fulfilling (*ACGME/ABMS, Institute of Medicine, Interprofessional Education Collaborative*)
  - ✓ What ACCME Commendation Criteria Does the Activity Meet? (C23 - C38)
- Joint Providership Agreement
- Disclosures for all parties involved in the accredited CME activity regardless of their role.
- CV/Biography for all presenter(s)/speaker(s)/moderator(s)/facilitator(s), (or other faculty)
- Photos for all speaker(s)/presenter(s)/moderator(s)/facilitator(s), (or other faculty)

## III. PROMOTIONAL MATERIAL GUIDELINES

Commercial support is not accepted by Edward-Elmhurst Health (non-profit is not commercial support), therefore it does not partner with Joint Providers that accept commercial support from ineligible companies.

Promotional materials must contain the elements listed below and must be reviewed by the Edward-Elmhurst ACME Department prior to publication or release:

- ✓ Title of Accredited CME Activity
- ✓ Date of Accredited CME Activity
- ✓ Speaker Name and Credentials
- ✓ Location of Accredited CME Activity
- ✓ Activity description (i.e., Need/gap overview)
- ✓ A minimum of 3 well-written objectives using Blooms Taxonomy rules
- ✓ Target audience
- ✓ Program agenda with time(s) and speaker(s)
- ✓ Any fees (if applicable) should be clearly listed.
- ✓ Joint Provider accreditation statement (provided by EEH ACME Department in the exact format and verbiage) with the approved number of approved credits.

All promotional material must be approved by Edward-Elmhurst Health's ACME Department prior to publication or release to participants. Marketing of any kind, a notice of credit or Joint Providership cannot be released until the accredited CME application has been approved by the Edward-Elmhurst Health Program & Education Committee.

#### IV. DOCUMENTATION REQUIREMENTS

Planning and documentation requirements for Jointly Provided Accredited CME Activities are the same as for any other Accredited CME Activity planned and implemented by Edward-Elmhurst Health's ACME Program. (See *Documentation of Accredited Continuing Medical Education Activities Policy*.) ACCME/ISMS Accreditation Criteria must be met for each activity designed for *AMA PRA Category 1 Credit™*. The Accreditation Criteria should be addressed during planning meetings and documented in minutes. Edward-Elmhurst Health's ACME Department must be informed of any changes, such as a change in program planner(s), speaker(s), or other individuals involved in the accredited CME activity that is Jointly Sponsored.

Original documentation materials must be kept on file and available for audit in the EEH ACME Department. These files are maintained for no less than six (6) years. The EEH ACME Department must receive the original documentation materials, including any handout(s), presentation(s), etc., within 10 days prior to the activity start date.

Collection and review of the following items are required to officially close an activity file and grant AMA PRA Category 1 Credit™ to providers:

- ✓ Joint Providership Agreement
- ✓ The material provided to the learners (i.e., agenda, notice, program packet, etc.)
- ✓ The format, tool, or mechanism used to identify relevant financial relationships of all individuals (template

provided), the mitigation method, documentation of mitigation, and how it was disclosed to learners.

- ✓ The data/information is used to determine the need/gap in knowledge, competence, or performance.
- ✓ The data/information generated from the accredited CME activity about changes that were achieved post-activity in knowledge, competence, or performance.

V. DISCLOSURE & MITIGATION OF FINANCIAL RELATIONSHIPS WITH INELIGIBLE COMPANIES

The primary planner of the accredited CME activity is responsible for ensuring that everyone involved in the accredited CME activity discloses all financial relationships with ineligible companies using the online disclosure form through the CloudCME® portal. The ACCME/ISMS defines “financial relationships” as relationships of any dollar amount occurring within the past 24 months. All financial relationships must be disclosed and mitigated prior to the start of the planning process. All financial relationships must be disclosed to the learners prior to the start of the accredited CME activity.

An individual with no relevant financial relationships must inform learners that no financial relationships exist prior to the start of the accredited CME activity.

If an individual refuses to disclose financial relationships, they are immediately disqualified from being involved in the accredited CME activity.

VI. ROLES & RESPONSIBILITIES

The role of Edward-Elmhurst Health’s ACME Department and the EEH Program & Education Committee is as follows:

- ✓ Ensures that all ACCME/ISMS Accreditation Criteria are met for Accredited CME Activities
- ✓ Provides Accreditation of the Jointly Provided Activity
- ✓ Provides oversight of the Accredited CME activity by reviewing Joint Providership Information and monitoring the activity as needed.
- ✓ Consults with Joint Provider regarding accreditation issues and requirements.
- ✓ Maintains records of attendance through CloudCME™ online attendance/registration system
- ✓ Trains Joint Providers on the use of the CloudCME™ system for Joint Providership Activities and provides ongoing support as needed.

The role of the Joint Provider is as follows:

- ✓ Formulates needs/gap assessment and proposes objectives for the accredited CME activity to complete the application.
- ✓ Provides corresponding documentation to obtain activity approval and CME credit.
- ✓ Obtains EEH ACME Program approval of all promotional materials relative to the Accredited CME activity.

- ✓ Provides all required presentation materials to EEH ACME Department 10 days prior to the activity.
- ✓ Promptly responds to all billing requirements from EEH ACME Department
- ✓ Adheres to the guidelines and standards outlined in the EEH ACME Program policies.

VII. TERMS & CONDITIONS

Joint Providership of one activity with an organization does not automatically imply additional Joint Providership opportunities for future activities. Each activity must be individually reviewed and must benefit from the input of EEH's Program & Education Committee and ACME Department. Applicants must sign a Joint Providership Agreement for each activity and agree to follow all EEH's ACME Program Policies and ACCME/ISMS guidelines and standards for each activity.

VIII. JOINT PROVIDERSHIP FEES

Application processing fees are non-refundable. If the activity is approved for Joint Providership, a flat fee is charged based on the length of the activity. This fee includes staff time for the services provided by EEH's ACME Department but does not include direct expenses provided to the Joint Provider such as mailings or marketing. Direct expenses (if applicable) are billed separately and itemized on the invoice for review. The Joint Providership fee is due 30 days after the activity date. The scheduled fee for Joint Providership Activities is as follows:

Number of Credits	Application Processing Fee	Joint Providership Fee	Total Fee
.25 - 2.0 credits	\$100	\$80/hour	\$120 - \$260
2.25 - 5.0 credits	\$200	\$80/hour	\$380 - \$600
5.25 - 10.0 credits	\$300	\$80/hour	\$720 - \$1,100

First Time Applicants: First time applicants are charged an additional one time \$100 orientation fee for training. This fee is assessed for first time applicants to cover the additional time required of the ACME Department staff to provide education to the applicant on the CME policies, procedures, and software. This fee may be waived depending on the CME experience of the applicant.

IX. QUESTIONS AND SUPPORT

Edward-Elmhurst Health's ACME Department provides Joint Providership organizations with a contact email to answer questions regarding the Joint Providership application and planning process. If questions arise about the application or activity documentation, joint provider planner(s) can contact the EEH ACME Department staff at [cmdept@eehcme.org](mailto:cmdept@eehcme.org) for information and help. Staff are available to respond within 24-48 hours depending on the day of the week. Regular business hours are Monday through Friday, 8AM - 4PM and does not include major holidays.

**CROSS REFERENCE(S)**

- ✓ EEH ACME Program: Solicitation and Acceptance of Commercial or Financial Support Policy
- ✓ EEH ACME Program: Application and Processing Instructions
- ✓ EEH ACME Program: Documentation of Accredited Continuing Medical Education Activities Policy.
- ✓ ACCME Policies & Definitions of Joint Providership
- ✓ ACCME Accreditation Requirements

REVISED: 08/25/2020, 08/31/2022

Approved By: Program & Education Committee: 9/10/2020, **09/08/2022**