

TITLE	EEH CME PROGRAM: PRIMARY ACTIVITY PLANNER RESPONSIBILITIES FOR ACCREDITED CONTINUING MEDICAL EDUCATION ACTIVITIES POLICY
PURPOSE	<ol style="list-style-type: none">1) To set forth the policy for the responsibilities of the Primary Activity Planner for Accredited CME activities sponsored or approved by Edward-Elmhurst Health's Accredited Continuing Medical Education Program ("CME Program").2) To comply with the Illinois State Medical Society (ISMS) and the Accreditation Council for Continuing Medical Education (ACCME) criterion.
APPLICABILITY	Edward-Elmhurst Health
POLICY STATEMENT(S)	<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 & Education Committee; and/or the Chair of the Program & Education Committee; and/or the majority members of the Program & 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>
DEI STATEMENT(S)	<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, 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 impacts the educational topic should be included.</p>
DEFINITION(S)	<ul style="list-style-type: none">• 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>.• Planner(s): An individual or group of individuals involved in the planning process and implementation, facilitation, or moderation of an accredited CME activity.

- 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 are those 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

Primary Activity Planner(s), and Co-Planner(s), and Others Involved in Accredited CME Activities

- I. The Primary Activity Planner is responsible for ensuring EEH's accredited continuing medical education (ACME) activities address the professional practice gaps of physicians and other health professionals as part of the team, and ensure that accredited continuing education serves the needs of patients and the public. Planner(s) must ensure that speakers present learners with only accurate, balanced, and scientifically justified recommendations. They must assure healthcare professionals and teams that they can trust accredited continuing education to help them deliver safe, effective, cost-effective, and compassionate care that is based on best practices and evidence. Planner(s) must do their part to create a clear, unbridgeable separation between accredited continuing education and marketing and sales. Co-planner(s) and others involved in accredited CME activities provide support for these efforts.

Who May Serve as Primary Activity Planner(s), Co-Planner(s), or Other Role Involved in Accredited CME Activity

- I. The Primary Activity Planner is a clinician or subject matter expert who collaborates with EEH's Accredited Continuing Medical Education Department to plan, implement, and evaluate an ACME activity. For reasons of financial accountability and adherence to EEH's policies, the Primary Planner(s) should be employed at least part-time at Edward-Elmhurst Health. Community providers, non-physicians, and community health partners may participate as co-planners in collaboration with an ACME Department member and/or P&E Committee Member(s) if a Joint Providership is taking place.
- II. It is expected that the Primary Activity Planner(s) familiarize themselves with EEH's ACME program policies including, but not limited to: Standards for Integrity and Independence in Accredited Continuing Education, Honorarium, and Identification and Resolution of Conflict of Interest, which are found on the CloudCME™ website under the Resources Tab. The EEH ACME Department staff and Program & Education

Committee members are available to answer questions regarding these policies.

Specific Responsibilities

- I. The Primary Activity Planner(s) with support from the Co-Planner(s) is responsible for ensuring the following Accreditation Council for Continuing Medical Education (ACCME)/Illinois State Medical Society (ISMS), American Medical Association (AMA), and Edward-Elmhurst Health (EEH) ACME Program Policies:
 - a. Planning an Accredited CME Activity
 - Selection of a planning group to coordinate the ACME activity planning process, if needed. Planning committees are usually comprised of 2-5 individuals. In most cases, should be more than one planner. If the primary planner has a financial conflict relevant to the subject matter of the activity, at least one planning group member must be non-conflicted and experienced in the subject matter. The Primary Planner(s) and Co-Planner(s) financial conflicts must be disclosed and mitigated prior to planning the activity. If the Primary Planner(s) are conflicted, then a non-conflicted ACME Department member and/or Program & Education Committee Member is responsible for the identification, mitigation, and documentation of the conflict and taking necessary action to resolve the Primary Planner(s) conflict(s) prior to the start of the activity planning.
 - Ineligible company employees are not allowed to participate in the planning, delivery, or authoring of Accredited CME activities. If the Primary Planner(s)/Co-Planner(s) or other planning group members are employees of an ineligible company, this is considered by the ACCME/ISMS to be a non-resolvable conflict. The Primary Planner(s)/Co-Planner(s) or other planning group members may not plan activities related to the products and/or services of their employer. (This does not include non-profit hospitals or health system services).
 - The Accredited CME activity must be designed to address identified learning needs of physicians derived from professional practice gaps in knowledge, competence, performance in practice, or community/population health needs.
 - Gaps are identified and substantiated by data from the target audience, expert opinion, scientific literature, national guidelines, and/or quality improvement data and must be provided to the ACME Department as part of the application process.
 - All activity planning and execution is documented in the online ACME application and ACME platform (CloudCME™) used by EEH ACME Department.
 - The activity must be designed to be fiscally sound and if honorarium payments are required, they must comply with EEH's ACME Program policy on Honoraria.

b. Content of a CME Activity

- The content developed serves the needs of patients and the public; is accurate, balanced, scientifically justified recommendations; helps healthcare teams deliver safe, effective, cost-effective, compassionate care that is based on best practice and evidence; and creates a clear, unbridgeable separation between accredited continuing education and marketing and sales.
- Clinical care recommendations, treatments, or manners of practicing presented in the Accredited CME activity are based on evidence that is accepted within the profession of medicine, are not known to have risks or dangers that outweigh the benefits and are not known to be ineffective in the treatment of patients.

c. Collecting Disclosures of Relevant Financial Relationships

- Planner(s)/Co-Planner(s) or Planning Group Member(s) are responsible for ensuring the collection of disclosures from selected planning participants, speaker(s), and others involved in the Accredited CME activity. Disclosures of financial relationships are collected for all individuals involved with the Accredited CME activity. All disclosures are completed online through the CloudCME™ portal and reviewed by the EEH ACME Department prior to the application review. The Program & Education Committee reviews the disclosure information during the application review process to determine if any other mitigation strategies should be applied for individuals with financial relationships with ineligible companies.
- All relevant conflicts must be mitigated and documented by a non-conflicted ACME Department member and/or Program & Education Committee Member. If a conflict cannot be mitigated, the individual must recuse themselves from participation in the Accredited CME Activity.
- Disclosure of financial relationships (or no financial relationships) with ineligible companies must be presented to learners prior to the activity by inclusion in the syllabus, by preliminary slide, or by posting online during registration. Participants of enduring material must be informed of financial relationships and mitigation prior to accessing educational content.
- If commercial influence is detected during a live activity, the Primary Planner(s)/Co-Planner(s) or planning group members must alert learners to ensure that a fair and balanced program is in place. Online materials are reviewed by the ACME Department prior to launch and Primary Planner(s)/Co-Planner(s) must ensure any biased content is updated prior to being allowed to publish educational content. If a learner reports commercial bias, the EEH ACME Department will follow-up with the learner and if warranted, will escalate the information to the Program & Education Committee to determine next steps.

d. Review of Presentations

- **Online conferences and workshops:** All presentations are received and reviewed by the ACME Department. In addition, presentation of conflicted speakers are reviewed by the designated non-conflicted P&E Committee Member or P&E Committee Chair. If there is any conflicts or bias identified in the presentation, the conflict is mitigated prior to the activity. This requires that all presentations be submitted to the EEH ACME Department in advance of the activity. For live activities, presentations should be submitted no later than 5 days prior to the educational activity to provide enough time for review and mitigation of any conflicts or HIPPA violations.
 - All issues of conflict and potential HIPPA violations must be totally mitigated in the final presentation and sent to the EEH ACME Department for review prior to the start of the activity and will not be posted online until review and resolution. Presentations can be found under the syllabus section of the activity page.
 - **Regularly Scheduled Series (RSS) Activities:**

Presentations of conflicted speaker(s) are reviewed by the ACME Department and/or the P&E Committee Member(s) prior to the start of the series. Conflict(s) of interest must be mitigated prior to the start of the activity. This requires that all presentations be submitted to the ACME Department in advance of the activity date(s). Case studies/case reviews do not need to be submitted if no presentation material is offered during the activity.
 - All issues of conflict and potential HIPPA violations are completely mitigated in the final presentation (if presentations are given) and mitigations are documented in the activity file in EEH ACME Department.
- e. Separation of Commercial Activities from Curriculum
- Ineligible companies must not have a role in the planning, delivery, or content creation of ACME activities at Edward-Elmhurst Health. Employees of ineligible companies cannot participate in the planning, delivery, or content creation of Accredited CME activities. Ineligible companies can only provide content in the following situations:
 1. Accredited education that is non-clinical, such as leadership or communication skills training.
 2. Accredited education where the learner group is in control of content, such as a spontaneous case conversation among peers.
 3. Accredited education includes a presenter from an ineligible company participating as a technician to teach the safe and proper use of medical device(s), and do not recommend whether or when a device is used, market, or promote the company.
 - Ineligible company employees may NOT offer recommendations regarding patient care. Permission for an ineligible company employee to provide content or

research for an Accredited CME activity must be obtained in advance from the Program & Education Committee and the employee's participation must be closely monitored by the Primary Activity Planner(s)/Co-Planner(s) or planner group to ensure compliance with all requirements, standards, and policies.

CROSS REFERENCE(S)

- EEH ACME Program: Process & Instructions
- EEH CME Program: Solicitation and Acceptance of Commercial or Financial Support Policy

REVISED: 09/10/2020 **08/31/2022**

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