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# Grant Application Guidelines

It is the requesting department’s responsibility to review each company’s procedures and deadlines for grant submission PRIOR to contacting the Office of CME (OCME) for assistance. For example, some companies require a detailed plan on outcomes measures or request a list of your organization’s Board of Directors.

In August 2013, the Centers for Medicare and Medicaid Services (CMS) implemented Open Payments (formally referred to as the Physician Payments Sunshine Act). The following suggestions were taken from the [CME Coalitional Compliance Guidelines for the Sunshine Rule](http://www.cmecoalition.org). In Summary, payments may be made to a continuing education provider (FSM) as long as payments are not made to a specific physician participant or speaker.

1. Verify for each company whether to include your speaker/faculty names in the agenda or on the budget estimate. (some companies require the speaker/faculty names while other companies specifically require NO speaker/faculty names)
2. Indicate that food & beverage will be served buffet style (the OCME strongly recommends not using commercial funding to off-set the cost of food and beverage).

**General Provider Information**

1. The Provider is: Northwestern University (the institution must match NU’s W-9 form).
2. Tax ID# 36-2167817

501 (c), (3)

1. Organizational Type: Academic Medical Center
2. Accreditation Level: Accreditation with Commendation
3. Dates of accreditation: March 2017 through March 31, 2023
4. Provider Contact: List the Office of CME personnel assigned to your CME accredited program:
   1. Clara Schroedl, MD, Medical Director of CME
   2. Sheryl Corey, Manager of CME
   3. Jennifer Banys, Senior Program Administrator
   4. Allison McCollum, Senior Program Coordinator
   5. Rhea Alexis Banks, Administrative Assistant 2
5. Provider Contact Information:

Office of CME, Northwestern University

240 E. Huron, Suite 1-200

Chicago, Illinois, 60611

Phone: 312-503-8533

Fax: 312-503-4531

Website: <http://www.cme.northwestern.edu/index.html>

Email: [cme@northwestern.edu](mailto:cme@northwestern.edu)

**NU’s Process for Applying for Educational Grants**

**ATTACHMENTS / DOCUMENTS TO BE INCLUDED IN THE GRANT APPLICATION:**

Each commercial interest has its own requirements. The Office of CME recommends that each grant application include the following data/documents:

* Letter of Request (LOR) [*Click here to see example.*](https://northwestern.cloud-cme.com/aph.aspx?P=1200)
* Learning Objectives
* Needs Assessment
* Professional Practice Gap
* Program Outcomes from previous conferences (past evaluation data)
* Description of anticipated outcomes
* Agenda containing topics
  + Speaker names and titles may need to be included or removed depending on the commercial company
* Budget estimate

**BUDGET ESTIMATES:**

Each company has their own format for submitting budget estimates. The OCME recommends attaching a detailed budget estimate. Please use the budget that was approved with your submitted CCME application.

**EXHIBITS:**

**Exhibits are** separate business transactions from educational grants. All exhibitors must submit a **Hold Harmless agreement** before they can be acknowledged as an exhibitor. A Hold Harmless Agreement template is available on our website: <http://www.cme.northwestern.edu/conference-tools/index.html>. Exhibits are a payment for the sale of promotional space and are not included in the educational grant. C**ompanies that do exhibit are expected to** abide by all applicable FDA, PhRMA and AdvMed regulations.

**ORGANIZATION INFORMATION FORMS OR FORMS FOR THE FEDERAL LOBBYING DISCLOSURE ACT 2003:**

The Provider (Northwestern University) is the organization to be listed on these forms, NOT the requesting institution coordinating the accredited program. Contact you CME coordinator for guidance on completing these forms.

**GRANT APPLICATION SUBMISSION PROCESS:**

**Online grant requests must be reviewed by the Office of CME prior to their submission.** Online grants should be entered into the commercial company’s website, saved, printed, and sent to the CME personnel for review and approval. Once the grant request has been approved by the Office of CME, the requesting department or institution may submit the grant.

Some companies require the ACCME Provider (i.e. Northwestern, and not the requesting department or institution) to submit online grant requests. In these instances, the Office of CME will submit the grants on behalf of the requesting department or institution. The requesting department or institution will provide the Office of CME the information by using the Grant Application Intake Form. If the grant is approved, the Office of CME can also reconcile the grant. The grant processing fees should be built into the activity’s budget estimate as CME administrative fees. These fees are to be recorded as a program expense. Please refer to the fee structure below for submitting and reconciling grants:

|  |  |
| --- | --- |
| **Directly Sponsored Programs** | **Jointly/Co or 3rd Party Sponsored Programs** |
| Online Grant Submission $100 per grant | Online Grant Submission $250 per grant |
| Online Status Reports $50 per report | Online Status Reports $100 per report |
| Online Reconciliation $100 per grant | Online Reconciliation $250 per grant |

**SUBMISSION TIMELINES:**

Most companies require 60-90 days lead time to consider a grant application for a CME activity. Some companies require submissions 120 days in advance of your program. Each company is different and it is the responsibility of the requesting department to research these deadlines ahead of time.

**WRITTEN LETTER OF AGREEMENT (LOA):**

**If your grant application is approved and the commercial interest agrees to provide funding for your activity, a fully executed LOA must be received, approved and signed by the Office of CME.** [Click here for Northwestern’s LOA](https://northwestern.cloud-cme.com/aph.aspx?P=1200)**. An LOA must contain the following items:**

* Itemizes how the Provider will use the commercial support in the development and presentation of the CME activity;
* Itemizes the organizations involved in the activity (e.g., joint sponsors, education partners, managers);   
  Specifies the organizational name of the commercial interest(s) that supplied the funds;
* Specifies what funds or in-kind services will be given by the commercial supporter to support the provider’s activity; and
* Is signed by the commercial interest and the accredited provider PRIOR to the activity taking place.

*NOTE*: An LOA MAY NOT be accepted if the requesting institution enters into a commercial support agreement where the commercial supporter specifies the manner in which the Provider or requesting institution fulfills the requirements of the ACCME’s Elements, Policies and Standards.

**REVIEW REQUIREMENTS FOR ELECTRONIC SIGNATURE:**

Most Commercial interests use **an online/electronic commercial support application processes, t**he ACCME accepts electronic signatures as evidence that written agreements are signed. **HOWEVER, the Office of CME must review the agreement prior to the online acceptance.** **The requesting institution must provide an electronic copy of the agreement to the Office of CME for review/approval prior to accepting the online agreement.**

**PAYEE INFORMATION:**

Educational grant funds may be issued to the department, affiliate, joint-sponsor or 3rd party. Prearrangements must be made with the Office of CME. A letter from the Office of CME will be issued to the organizing department or institution. The requesting department or institution should communicate to the Office of CME who will receive the check.

If the commercial interest must pay the Provider (Northwestern University), the Office of CME will deposit the check and issue the funds to the requesting department or institution. Please refer to the fee structure below for distributing educational grants. The grant processing fees should be built into the activity’s budget estimate as CME administrative fees. These fees are to be recorded as a program expense.

|  |  |
| --- | --- |
| **Educational Grant Processing Fee** | |
| Up to $20,000 | $250 |
| $20,001 - $50,000 | $500 |
| Over $50,001 | $650 |

**Frequently Asked Questions**

**Acknowledgement:** Companies that provide educational grants must be acknowledged in the program materials.

**Approved Signature for Letters of Agreement:**

Pharmaceutical Company’s Letters of Agreement:

Clara Schroedl, MD

Medical Director of CME

Feinberg School of Medicine

Northwestern University’s Letters of Agreement: The Office of CME coordinator assigned to the CME accredited program:

Sheryl Corey, Manager of CME

Jennifer Banys, Senior Program Administrator

Allison McCollum, Senior Program Coordinator

Rhea Alexis Banks, Administrative Assistant 2

**Control of the educational content (including speaker selection and presentations, budget, and program planning):**

Northwestern University Feinberg School of Medicine is responsible for the development and implementation of its CME programs. The educational content, learning objectives, agenda and faculty/speaker selection are developed by a medical school faculty member (the course director) and/or a faculty planning committee. The course director/planning committee as well as the Office of CME instruct the speakers to deliver a presentation that provides a balanced view of therapeutic options. In addition, the presentations are reviewed by members of the Office of CME to verify the presentations are without commercial bias. The budget estimate is developed by the course director/planning committee members and is reviewed by the CME Review Committee.

**Educational Organizer, Content Developer, or Institution Responsible for Educational Content:**

Course Directors must be a Faculty Members at Northwestern University or a Northwestern Medicine physician, therefore the appropriate institution is Northwestern University. If the grant request requires an individual be identified, the course director is the appropriate individual. Joint-sponsors, 3rd Parties and/or MECC are not the appropriate institution or individual.

**Firewall:** The Office of CME at Northwestern University Feinberg School of Medicine does not participate in purchasing products or recommending services related to patient care.

**How long has NU been a CME Accredited Provider?**

Northwestern University has been a CME Accredited provider since 1975.

**Mission Statement:**

The Office of Continuing Medical Education (OCME) at the Feinberg School of Medicine (FSM) is the accredited Provider for the McGaw Hospitals and NMHC.  The OCME’s goal is to improve physician knowledge, competency, and enhance performance in practice by providing activities on cutting-edge research and technological advancements to our target audience.  We strive to objectively present up-to-date, clinically relevant, scientifically rigorous, evidence-based medical information in order to promote excellence in medical care and patient safety.

The Office of CME’s purpose is to facilitate the development, implementation, and evaluation of education activities and ensure FSM activities comply with the Essentials and Standards of the ACCME.

**Opted-In & Opted-Out Process:** This activity will be promoted via bulk E-mail to our past participants and to the medical school’s faculty and staff through the school’s Office of Communications. The participants provide their email address during the previous year’s conference registration, the faculty/staff are automatically put into the Office of Communication’s internal bulk E-mail distribution list. Each group has the option to request to be taken out of the distribution list.

**Process for Identifying Possible Conflicts of Interest:**

In accordance with ACCME Standards for Commercial Support of Continuing Medical Education and the Feinberg School of Medicine’s disclosure policy for CME activities, all individuals who contribute to the content or the identification/resolution of potential conflicts of interest must disclose any relationship they may have with **any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients within the preceding 12 months of the activity.** Such disclosure is intended to provide participants with sufficient information to evaluate whether any given presentation has been influence by the faculty’s relationships(s) or financial interest with said companies.

Circumstances create a conflict of interest when an individual has an opportunity to affect CME content about products or services of a commercial interest with which he/she has a financial relationship. The purpose for identifying and addressing potential conflicts of interest is to ensure a proper balance, independence, objectivity and scientific rigor of the medical school’s educational activities. The medical school does not view the existence of a financial relationship as necessarily implying bias or decreasing the value of participation in CME activities, but must ensure that a financial interest is not a conflict of interest. Identifying Conflict of Interest:A six-tier peer review system has been developed to identify possible conflicts of interests.

* + The first tier is the Speaker
  + The second-tier is the Course Director and/or Planning Committee Members
  + The third-tier is the CME Manager
  + The fourth-tier is the CME Review Committee
  + The fifth-tier is the CME Medical Director
  + The sixth-tier is the CME Coordinator

**Provider’s Honoraria Guidelines:**

Northwestern University allows reasonable honorariums to be paid to given individuals conducting, planning and speaking at CME activities. The principle for setting guidelines for honorarium amounts is to compensate those individuals who contribute to the content of an activity. Honoraria amounts vary widely due to medical specialty, location of the activity, level of participation in planning the activity, number of lectures, etc. Therefore the honoraria amounts are to be determined by the course director and his/her department chairman. The CME Manager, CME Review Committee and the CME Medical Director will determine whether the honoraria amount is considered reasonable. If any honorarium exceeds $3000 per day and/or lecture, the course director must submit a written explanation to the CME Review Committee when submitting the CME Application.

**Requesting Institution or Educational Partners:**

* Departments, Centers and Institutions within the Feinberg School of Medicine should list Northwestern University
* Affiliates should list their own institution; the Provider MUST be listed as Northwestern University. NU affiliates are:
  + Ann & Robert H. Lurie Children's Hospital of Chicago
  + Northwestern Memorial Hospital
  + Northwestern Medicine Central DuPage Hospital
  + Northwestern Medicine Delnor Hospital
  + Northwestern Medicine Lake Forest Hospital
  + Shirley RyanAbility Lab
  + John H. Stroger Jr. Hospital of Cook County
  + Jesse Brown VA Medical Center
* Joint-Sponsors should list their organization; the Provider MUST be listed as Northwestern University.
* 3rd Party (defined as an events Management Company hired to coordinate the program logistics) or Medical Education/Communications Company (MECC) list their organization, the Provider MUST be listed as Northwestern University.

**Other Questions:**

1. In the past 12 months has your organization been:
   1. Asked to respond to a complaint or inquiry about an educational activity? No.
   2. Placed on probation status by an accrediting body? No.
   3. Found to be in partial compliance of non-compliance by an accrediting body? No.
2. Which regulatory bodies recognize your organization as an accredited provider? ACCME.

**For additional information, please refer to “Ask ACCME” located at:** [**http://www.accme.org/index.cfm/fa/faq.home/Faq.cfm**](http://www.accme.org/index.cfm/fa/faq.home/Faq.cfm)