# Procedures & Policies

**Table of Contents**

[CME Review Committee Responsibilities: 2](#_Toc489540642)

[Industry / Commercial Support Agreements: 3](#_Toc489540643)

[Grant Submission and Reconciliation: 3](#_Toc489540644)

[Code of Professionalism for Commercial Company Representatives at a CME Activity: 3](#_Toc489540645)

[Exhibitor Policies: 4](#_Toc489540646)

[Advertisement Policies: 4](#_Toc489540647)

[CME Certificates: 4](#_Toc489540648)

[Activity Postponement or Cancellation: 4](#_Toc489540649)

[Activities Not In Compliance with the ACCME, AMA or FSM Policies: 4](#_Toc489540650)

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## CME Review Committee Schedule & Responsbilties:

The CME Review Committee meets the first Wednesday of the month to discuss applications. Applications will be turned into the Office of CME 3 weeks prior to allow for adequate time for the committee members to review. Dates of deadlines and committee meetings can be found on the Office of CME website. They will not accept applications submitted to the committee less than 3 months prior to the date of the activity.

The course director will be informed of the committee’s discussions the week after the committee meeting.

The committee is responsible for:

* 1. Providing oversight for the conduct of FSM continuing medical education activities
  2. Ensuring that CME activities comply with FSM Office for Regulatory Affairs (located at <http://www.feinberg.northwestern.edu/compliance/resources/coi-and-prof-integrity/coi-policy-page.html>) and ACCME Standards for Commercial Support (<http://www.accme.org/>) policies and procedures
  3. Reviewing and approving the continuing medical education content
  4. Verifying that the content is free of commercial bias
  5. Verifying that a balanced view of therapeutic options is presented
  6. Ensuring there is not a conflict of interest for those faculty involved in the planning or presentation of the educational content
  7. Ensuring that continuing medical education activities comply with the medical school’s policies and procedures
  8. Providing recommendations to the activity directors.

CME Medical Director is responsible for verifying an educational planning process was used to identify the educational need and develop the educational program and the activity’s content supports the mission statements of FSM and the OCME.

CME Approval*:*

The course director(s) will be notified of approval in writing. An invoice for sponsorship fee and guidelines for conducting the activity will be included with the approval memorandum.

## Industry / Commercial Support Agreements:

Where financial or in-kind support from a commercial interest is involved, a Letter of Agreement must be completed, signed by all parties and returned to the Office of CME prior to any acknowledgement. If the Office of CME has not received the signed LOA prior to the date of the educational activity, the company cannot be acknowledged in the program materials and the educational grant cannot be accepted. The agreement must be signed by a representative from the commercial interest and the Provider. The Provider is Northwestern University with the contact information of the Feinberg School of Medicine Office of Continuing Medical Education. The university’s Office of General Council has designated Dr. Clara Schroedl, CME Medical Director, as the appropriate signature for commercial company’s LOA; members of the OCME are the designees for the medical school’s LOA. The sponsoring department, affiliate or co/joint provider are **NOT** the appropriate signature for LOAs.

All industry support must be given with full knowledge and approval from the OCME. The course director must make all decisions regarding the disposition and disbursement of commercial support. The Manager of CME, members of the CME Review Committee and CME Medical Director must approve the disbursement of commercial company funds during the application process. If there are any changes in the status of the support, the course director must inform the Manager of CME. Funds provided by commercial supporters may not be used for travel, lodging, honoraria or personal expenses for participants of the activity.

For educational activities **NOT** coordinated by the Office of CME, the OCME will provide a grant request letter indicating that the funds be distributed to the affiliate or co/joint provider. If the company must pay the Provider (FSM), the OCME will process the educational grant and issue the funds to the sponsoring department, affiliate or co/joint provider. Please refer to the fee structure for the fees associated with distributing educational grants. The grant processing fees should be built into the activity’s budget estimate as CME administrative fees.

## Grant Submission and Reconciliation:

The department, affiliate, medical education company, medical education company, co/joint provider coordinating the activity is responsible for processing the online grant submissions, reconciliations and retaining the activity’s financial records for a period of 3 years.

Educational grant requests must be communicated to the Provider (Northwestern University Feinberg School of Medicine) prior to the grant submission. A copy of all grant requests must be submitted to the Office of CME prior to their submission to the commercial company.

Grant submissions must reflect the anticipated income and expenditures for an upcoming activity. It is appropriate to include a department administrative fee to cover the cost that the hosting department incurs for their faculty and administrative staff’s time to develop and execute the learning activity. The letters of agreement must indicate how the funds are to be used (e.g., speaker’s honoraria, printing costs, etc.). The hosting department is responsible for reconciling the educational grant as stated in the letter of agreement. If the letter of agreement states that the excess funds should be returned if the activity is cancelled or the activity does not require the entire amount of grants given, the excess amount must be returned. For example, if the letter of agreement identifies the funds will be used for printing, and the printing cost are less than originally predicted, those excess funds must be returned. In the event that multiple companies have issued educational grants, the excess funds will be returned only to those companies that have the requirement included in their agreement.

## Code of Professionalism for Commercial Company Representatives at a CME Activity:

The course director of a CME activity may allow commercial companies to exhibit at a CME activity. In these instances, the commercial company may have two representatives to staff the exhibit booth. If there are different levels of support (or fees to the exhibitors), any additional benefits provided to the exhibitors must be communicated and approved by the Office of CME. The representatives will be provided with one registration list (per company) consisting of the participants’ names, cities & states only. At the conclusion of the activity (if approved by the course director) the representatives may have any remaining handout materials such as the activity syllabus.

Commercial representatives may listen to lectures at the CME activity, but they are not considered participants and must refrain from commenting in the question and answer sessions. FSM expects the commercial representative to refrain from inviting the faculty, guests or participants to social events that are not related to the CME activity.

## Exhibitor Policies:

Monies paid by commercial interest for exhibit space and advertisement are promotional in nature and are not considered to be “commercial support”. An exhibitor is defined as a company that has purchased a display booth as an advertisement for their company. A designated exhibitor area must be identified and the opportunity to purchase an exhibit booth must be open to multiple companies. The invitation letter to commercial companies must be reviewed and approved by the Office of CME prior to their distribution.

Compliance with Standard 4 – Appropriate Management of Associated Commercial Promotion in the ACCME Standards for Commercial Support Commercial applies.

Exhibits:

* Cannot influence planning or interfere with the presentation, nor can they be a condition of the commercial support
* Product / promotional materials of any type are prohibited in or during the CME activities. The juxtaposition of advertising materials must be kept separate from the CME activity
* Advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CME activity.
* Products and/or promotional materials may not be distribute at the CME activity’s registration desk or included in the activity’s handout materials.
* The acknowledgement of exhibitors may be printed on the CME activity’s tote bag. However all exhibitors must be acknowledged, a single company or their logo may not be singled out.
* Representatives of the commercial companies may not engage in sales or promotional activities while in the space of place or the CME activity.
* Must be acknowledged as exhibitors not supporters.
* Exhibitors must sign FSM’s Hold Harmless Agreement

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## Advertisement Policies:

Monies paid by commercial interest for advertisement are promotional in nature and are not considered to be “commercial support”. The invitation letter to commercial companies must be reviewed and approved by the Office of CME prior to their distribution.

Compliance with Standard 4 – Appropriate Management of Associated Commercial Promotion in the ACCME Standards for Commercial Support Commercial applies.

CME programs may sell advertising space. The advertisement may not be interleafed within the pages of the CME content. Advertisements must be separate from all educational materials and must be clearly identified as an advertisement. Advertising may be placed on the activity website, however, if a link is provided to the company’s website it must be communicated that the individuals are leaving the activity website. The restrictions for advertising on the activity website mirror the ACCME’s requirements for linking to a commercial website from a web-based CME activity. Advertising cannot be sold or permitted in the educational activity area, such as banners during the activity, reception or at a CME activity’s poster session. All advertising opportunities must be reviewed and approved by the Office of CME.

## CME Certificates:

The OCME is required by the AMA to: (1) document the number of credit hours the physicians participated in the CME activity, (2) maintain the attendance records for six years, and (3) provide a credit certificate that accurately reflects the number of credit hours the physician earned.

Participants’ certificates and transcripts will be available for them to download at [www.cme.northwestern.edu](http://www.cme.northwestern.edu) as soon as the Course Coordinator enters in attendance. Once the Office of CME has submitted its Annual ACCME Report (March of the subsequent year), the attendance data and credits issued cannot be altered.

The sponsoring department is responsible for obtaining additional continuing education credits (such as nursing credits, AAFP, etc.) including the production and distribution of the CE certificates.

## Activity Postponement or Cancellation:

If an educational activity is postponed and rescheduled within the same fiscal year in which the application was approved by the CME Review Committee, the activity will maintain its CME accreditation status with no additional fees. If an activity is cancelled the CME fees will not be refunded to the sponsoring department, affiliate or co/joint provider. The postponement and/or cancellation must be made in writing to the Manager of CME.

## Activities Not In Compliance with the ACCME, AMA or FSM Policies:

It is the responsibility of the sponsoring department; affiliate or co/joint provider to communicate with the OCME throughout the activity’s planning process. All activity materials (promotional, handout materials, etc.) must be reviewed and approved by the OCME prior to their distribution. If the activity’s coordinator does not comply with the review process, a fine of $1000 will be issued to the sponsoring department, affiliate, and/or co/joint provider. The OCME will not distribute CME certificates to the participants until the CME Fees (including the fine) is received.

**CME CREDIT WILL BE WITHDRAWN** if the activity is not in compliance with the ACCME Guidelines for Commercial Interest and Faculty Disclosure Policies. In addition, the CME Medical Director will determine whether the sponsoring department, affiliate and/or co/joint provider are eligible for future accreditation.

If the ACCME receives a complaint about an educational activity not coordinated by the Office of CME, the course director will be responsible for responding to the complaint according to the ACCME’s Procedure for Handling Complaints located at: [90\_ACCME Process for Handling Complaints Regarding ACCME Accredited Providers\_20101221.pdf](http://www.accme.org/sites/default/files/null/90_ACCME%20Process%20for%20Handling%20Complaints%20Regarding%20ACCME%20Accredited%20Providers_20101221.pdf), and any fees associated with the complaint.