

# **Continuing Medical Education Policies & Procedures**

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#### I. General Information

Virtua Health is accredited by the Medical Society of New Jersey (MSNJ) and follows the guidelines of the American Medical Association (AMA) to provide the AMA PRA Category 1 Credit(s)<sup>TM</sup>.

Virtua Health requires all CME applications to be submitted at least thirty days before the date of the program. No advertisement that designates CME credit or approval can be distributed prior to program approval by the Virtua CME Committee.

#### Virtua Health's Mission

We are dedicated to providing each patient and their family with an outstanding experience, and to ensuring the highest quality healthcare for the community. We are committed to providing our healthcare team with resources, technology and training as well as with opportunities for professional growth.

#### Virtua Health's Vision

Virtua Health's vision is to emerge as a comprehensive healthcare system that is widely preferred to provide treatment for complex as well as routine medical conditions.

- Virtua will be renowned for its clinical quality and excellent service so that the community will choose it over other healthcare providers in the region.
- Virtua will provide a wide range of services to meet community needs and will seek out affiliations and partnerships with other healthcare organizations when it is unable to meet those needs.
- Virtua is committed to fostering a caring culture, and will be known for treating our patients and each other with respect and compassion.
- Virtua is dedicated to becoming the employer of choice in the region so that the best people will seek employment with us.
- Physicians will prefer to practice and admit their patients at Virtua because of its high quality patient care, advanced technology and professional staffing.
- Virtua will remain financially stable and will be able to finance its future growth.
- Virtua will earn national recognition for its philosophy, clinical quality and business practices.

#### Virtua Health's Values

#### Integrity

We will be accountable for and take pride in our actions, while maintaining a customer focus. Values in action:

- We are ethical and trustworthy.
- We maintain the confidentiality of all our customers.
- We are true to ourselves and others.
- We are respectful of others' needs and concerns.
- We maintain a positive attitude towards each other.

#### Respect

We will treat our customers with high regard while honoring and valuing their requests and decisions.

#### Our values in action:

- We really listen to our customers.
- We show courtesy and respect our customers' privacy.
- We accept customers as they are.
- We value one another.

#### Caring

We will have understanding, empathy, compassion, and the ability to meet the needs of our customers.

Our values in action:

- We have a sincere positive attitude.
- We put others' needs ahead or our own.
- We show genuine sensitivity and concern for our customers.

#### Commitment

We will be dedicated to acting in accordance with the mission, vision, and values of Virtua Health. Our values in action:

- We exceed the expectations of our customers.
- We follow through to ensure positive outcomes.
- We promote Virtua within the community.
- We go the extra mile.
- We fulfill our responsibilities.

#### Teamwork

We will work with our customers in a reliable and dedicated fashion toward a common purpose/goal. Our values in action:

- We foster a supportive environment.
- We respect each others' differences.
- We pitch in without being asked.

#### Excellence

We will be dedicated to providing the best quality care and services to our customers.

Our values in action:

- We strive towards continually improving ourselves and the organization.
- We set and achieve high performance standards.



- 1. **Purpose** Virtua strives to provide opportunities for enhancing and building physician leaders within the organization. Virtua is dedicated to its patients and the desires it's physicians to be able to provide the best service and highest standards of clinical competence. Virtua is committed to ensuring their physicians can access the most current clinical education available.
- 2. **Content** The content of the program has a primary emphasis on current topics related to patient care throughout the institution. Educational programs not specifically related to patient care such as scientific, ethical, legal, health policy, medical staff leadership, patient safety, and socioeconomic issues which impact upon the medical staff physicians are included. Medical staff physicians may expect to achieve, but not all, of their CME needs through Virtua Health.
- 3. **Audience** The target audience for the continuing medical education programs includes all medical staff physicians, however, as times call for collaboration and partnerships, Virtua may also include other members of our professional staff and community.
- 4. **Types of Activities** The activities to achieve our goals include (but are not limited to) didactic lectures, conferences, clinical skills workshops, seminars, operational leadership panel discussions, and an assessment survey of the participants to evaluate the impact of these educational activities. The program provides direction to the Medical Library as a resource for CME through the use of written, audiovisual, and computer materials.
- 5. **Expected Results** The Virtua Health CME program uses needs assessment, CQI process, and evaluation tools to measure the impact of the CME programs on clinical care. The expected results are the objective measure of the outcomes which will be demonstrated in the analysis of the data that supports the Virtua Health STAR initiative which is to create an outstanding patient experience.

CME program activities are planned and organized based upon identified needs assessment process for implementing educational programs to meet the needs of the participants and in response to the availability of excellent speakers and programs. Programs are well-publicized, conveniently accessible, financially feasible, and regularly evaluated. Speakers, coordinators, financial supporters, and joint providers (if any) must be guided by this Mission Statement, and abide by the Essential Areas, Elements and Guidelines set forth by Medical Society of New Jersey (MSNJ).

### II. <u>The MSNJ definition of CME</u>

CME consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public or the profession. The content of CME is the body of knowledge and skills generally recognized and accepted by the profession as within the basic medical sciences, the discipline of clinical medicine, and the provision of healthcare to the public

A broad definition of CME, such as the one found above recognizes that all continuing educational activities which assist physicians in carrying out their professional responsibilities more effectively and efficiently are CME. A course in management would be appropriate CME for physicians responsible for managing a health care facility; a course in educational methodology would be appropriate CME for physicians teaching in a medical school; a course in practice management would be appropriate CME for practitioners interested in providing better service to patients.

Not all continuing educational activities which physicians may engage in however are CME. Physicians may participate in worthwhile continuing educational activities which are not related directly to their professional work and these activities are not CME. Continuing educational activities which respond to a physician's non-professional educational need or interest, such as personal financial planning, appreciation of literature or music, are not CME.

# III. MSNJ Essential Areas and Their Elements

Essential	Area and Element(s)	Criteria for Compliance
Essential Area 1: Purpose And Mission	The provider must, E.1 Have a written statement of its CME mission, which includes the CME purpose, content areas, target audience, type of activities provided, and expected results of the program.	C 1 The provider has a CME mission statement that includes all of the basic components (CME purpose, content areas, target audience, type of activities, expected results) with expected results articulated in terms of changes in competence, performance, or patient outcomes that will be the result of the program.
Essential Area 2: Educational Planning	The provider must, <b>E 2.1</b> Use a planning process that links identified educational needs with a desired result in its provision of all CME activities. <b>E 2.2</b> Use needs assessment data to plan CME activities. <b>E 2.3</b> Communicate the purpose or objectives of the activity so the learner is informed before participating in the activity. <b>E 3.3</b> Present CME activities in compliance with the MSNJ policies for disclosure and commercial support.	C 2 The provider incorporates into CME activities the educational needs (knowledge, competence, or performance) that underlie the professional practice gaps of their own learners. C 3 The provider generates activities/educational interventions that are designed to change competence, performance, or patient outcomes as described in its mission statement. C 4 The provider generates activities/educational interventions around content that matches the learners' current or potential scope of professional activities. C 5 The provider chooses educational formats for activities/ interventions that are appropriate for the setting, objectives and desired results of the activity. C 6 The provider develops activities/educational interventions in the context of desirable physician attributes (e.g., IOM competencies, ACGME Competencies). C 7 The provider develops activities/educational interventions independent of commercial interests (SCS 1, 2 and 6). C 8 The provider appropriately manages commercial support (if applicable, SCS 3). C 9 The provider actively promotes improvements in health care and NOT proprietary interests of a commercial interest (SCS 5).
	The provider must, <b>E 2.4</b> Evaluate the effectiveness of its CME activities in meeting identified educational needs. <b>E 2.5</b> Evaluate the effectiveness of its overall CME program and make improvements to the program.	C 11. The provider analyzes changes in learners (competence, performance, or patient outcomes) achieved as a result of the overall program's activities/educational interventions C 12. The provider gathers data or information and conducts a program-based analysis on the degree to which the CME mission of the provider has been met through the conduct of CME activities/educational interventions. C 13. The provider identifies, plans and implements the needed or desired changes in the overall program (e.g., planners, teachers, infrastructure, methods, resources, facilities, interventions) that are required to improve on ability to meet the CME mission. C 14. The provider demonstrates that identified program changes or improvements required to improve on the provider's ability to meet the CME mission, are underway or completed. C 15. The provider demonstrates that the impacts of program improvements, that are required to improve on the provider's ability to meet the CME mission, are measured.
Essential Area 3: Evaluation and Improvement Accreditation with Commendation	In order for an organization to achieve the status Accreditation with Commendation, the provider must demonstrate that it fulfills the following Criteria 16 - 22, in addition to Criteria 1-15.	<ul> <li>C 16. The provider operates in a manner that integrates CME into the process for improving professional practice.</li> <li>C 17. The provider utilizes non-education strategies to enhance change as an adjunct to its activities/ educational interventions (e.g., reminders, patient feedback).</li> <li>C 18. The provider identifies factors outside the provider's control that impact on patient outcomes.</li> <li>C 19. The provider implements educational strategies to remove, overcome or address barriers to physician change.</li> <li>C 20. The provider builds bridges with other stakeholders through collaboration and cooperation.</li> <li>C 21. The provider participates within an institutional or system framework for quality improvement.</li> <li>C 22. The provider is positioned to influence the scope and content of activities/educational interventions.</li> </ul>

### IV. <u>Responsibilities of the CME Committee</u>

Virtua's CME Committee meets quarterly and follows the guidance of the AMA which states that Accredited CME providers should collaborate with their faculty, whenever possible; to ensure the content of the educational activities they designate for *AMA PRA Category 1 Credit*<sup>TM</sup> is accurate, current and objectively presented. Educational needs should guide activities and the development of their purpose and/or learning objectives. These needs may be driven and defined by individual physicians, groups of physicians and/or outside organizations.

Virtua's CME Committee will be required to complete a regular and complete assessment of the needs of the professional staff on an annual basis. This process allows for a thorough and detailed analysis of where the medical facility stands. This report in conjunction with quality data will be used to plan the up coming years CME presentations.

Virtua's CME Committee's primary responsibility is to review the programs to determine if it meets all the accreditation guidelines outlined in the essential areas. The committee discusses issues relevant to CME as well as identifies areas of improvement and future program topics.

The following are the primary objectives of the CME Committee:

- Conduct appropriate control and oversight of the overall CME program
- Assess and review CME needs
- Assure that activities and their objectives are appropriate and in the context of the CME mission, needs assessment data, and the target audience.
- Assure that the activities are appropriately designed to meet the Essential Areas
- Review and utilize the evaluation data
- Annual review the CME mission and overall CME program in term of its accomplishment of the mission.

### V. <u>Responsibilities of the CME Activity Directors</u>

Each department shall have a CME Activity Director responsible for regularly scheduled CME conferences as well as courses and symposia. It is the responsibility of the CME Activity Director, with oversight from the CME Committee, to ensure that all MSNJ Essential Areas and Elements are adhered to including:

- Documenting that a planning process is used that links identified educational needs with stated purposes and objectives.
- Needs assessment data from multiple sources are used to plan CME activities
- Learning objectives of the activity describe learning outcomes in terms of physician performance on patient health and are consistently evaluated
- Individual CME activities are consistently evaluated for effectiveness in meeting identified educational needs
- Activity Directors are expected to contribute to the periodic evaluation of the overall CME program

- Ensuring that the content of the activity promotes improvements or quality in healthcare and does not promote the business interest of any commercial sponsor. All persons in a position to control the content of an activity (moderators, presenters) must be free of the control of a commercial interest.
- Ensuring that all individuals in a position to influence content disclose any conflict of interest. Speakers must explicitly describe all his/her related financial relationships to the audience at the beginning of the presentation. Individuals that refuse to provide disclosure information must be disqualified. Conflicts of interest and refusals to disclose must immediately be reported to the CME Coordinator. The CME Coordinator may, at their discretion, request that the activity directors appoint a commercially disinterested physician to peer review the conflicted individuals presentation, or may refer the matter to the CME Committee.
- Ensuring that commercial support is used appropriately. All support received must be in the form of an educational grant and a Letter of Agreement must be submitted and signed by the commercial supporter and the CME Coordinator. Educational grants must be provided to the sponsoring department or division or to Virtua Health with oversight from the CME Committee. Educational grants may never be paid directly to an individual faculty member. Commercial support may not be used to compensate or otherwise materially reward attendees in the audience (e.g. through payment of travel expenses, lodging, honoraria or personal expenses). Gifts of any type may not be distributed to attendees or participants before, during or after the activity. The Medical Affairs will maintain a database of all financial support received in connection with CME activities. The CME Committee will review this data twice per year.
- Ensuring that:

a) Exhibits do not take place in the actual education room

b) Product information of any kind is not displayed in the education room

c) A limited number of representatives are present at an activity they support, with the expressed permission of the activity director

d) That representatives do not engage in sales activity in the education room

e) Exhibit space is offered on a 'first-come, first-served' basis

f) Commercially supported social events do not interfere with or take precedence over educational activities.

### VI. <u>Standards for Commercial Support/Standards to Ensure Independence of</u> <u>CME Activity</u>

#### **STATEMENT OF PURPOSE:**

Virtua Health is committed to providing CME activities that are linked to quality and safety, are effective in improving medical practice, are based on valid content, and are independent of commercial interests. Our CME–certified activities are for scientific and educational purposes only and will in no way promote products and services of the commercial interests either in the content or selection of topics.

#### **1. INDEPENDENCE:**

As an MSNJ Accredited Sponsor, Virtua Health, will ensure that the following decisions are controlled by the accredited sponsor and are completely free of the control of a commercial interest:

- Identification of CME needs and selection of target audiences
- Determination of educational objectives
- Selection and presentation of content
- Selection of all persons and organizations that will be in a position to control the content of the CME
- Selection of educational methods
- Evaluation of the activity

### 2. RESOLUTION OF PERSONAL CONFLICTS OF INTEREST:

- Virtua Health as an MSNJ accredited sponsor will require "meaningful disclosure" of relevant financial relationships with any commercial interests from faculty, joint sponsors, and others in a position to control the content of CME activities sponsored

- An individual who refuses to disclose his or her relationships will be disqualified from any involvement in the planning, development, teaching/presenting, managing, or evaluation of the CME activities

- Based on the disclosures provided, Virtua Health will be responsible for identifying and resolving all conflicts of interest prior to the educational activity being delivered to learners

### 3. APPROPRIATE USE OF COMMERCIAL SUPPORT:

- Virtua Health must make all decisions regarding the disposition and disbursement of commercial support.
- There will be no conditions from commercial interest(s) attached to provision of support for educational programs.
- Funds should be in the form of an educational grant made payable to the **Virtua Health Foundation/CME** unless otherwise designated
- The terms, conditions and purposes of the educational grant will be documented in a **written letter of agreement** between the commercial supporter and the Virtua Health and include CME provider's educational partners or joint sponsors.
- All support associated with this CME activity must be given with the full knowledge and approval of Virtua Health.
- Payment of honoraria and reimbursement of out-of-pocket expenses for planners, teachers, and authors will be provided directly by Virtua Health or its joint

sponsor/educational partner and never directly by the commercial supporter. These payments will always be in compliance with the Virtua Health's written policies and procedures governing honoraria and reimbursement of associated expenses.

- No other payment shall be given to the program director, faculty, joint sponsors, or others involved with the CME activity (e.g., additional honoraria, extra social events, etc.).
- Funds originating from a commercial source may not be used to pay for travel, lodging, registration fees, honoraria, or personal expenses for non-faculty attendees.
- Virtua Health and its educational partners will be accountable for documenting the receipt and expenditure of the commercial support.

### 4. APPROPRIATE MANAGEMENT OF ASSOCIATED COMMERCIAL PROMOTION:

- Arrangements for commercial exhibits or advertisement cannot influence planning or interfere with the presentation, nor can they be a condition for the provision of commercial support for CME activities.
- Product-promotion material or product-specific advertisement of any type is prohibited in or during CME activities. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from CME.
  - i. For **PRINT**, advertisements and promotional materials will not be interleafed within the pages of the CME content. Advertisements and promotional materials may face the first or last pages of printed CME content as long as theses materials are not related to the CME content they face **AND** are not paid for by the commercial supporters of the CME activity.
  - ii. For **COMPUTER BASED** activities, advertisements and promotional materials will not be visible on the screen at the same time as the CME content and not interleafed between computer "windows" or screens of the CME content.
  - iii. For **AUDIO and VIDEO RECORDING**, advertisements and promotional materials will not be included within the CME. There will be no "commercial breaks."
  - iv. For **LIVE**, **FACE-TO-FACE CME**, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CME activity. Representatives of commercial interest(s) are not allowed to engage in sales or promotional activities while in the space or place of the CME activity.
- Educational materials that are part of a CME activity, such as slides, abstracts, syllabi and other handouts, cannot contain any advertising, trade name or a product-group message.
- Commercial interests will not be allowed to act as agents providing a CME activity to learners, e.g., distribution of self-study CME activities or arranging for electronic access to CME activities.
- Upon a written request from the Virtua Health, commercial supporters may help in supplemental distribution of promotional materials for CME activities, e.g., "save-the-date cards" and brochures provided that they are in compliance with Virtua Health's written policy about the role of representatives of commercial supporters in Virtua Health's sponsored CME activities.

### 5. CONTENT AND FORMAT WITHOUT COMMERCIAL BIAS:

The content or format of a CME activity or its related materials must promote improvements or quality in healthcare and not specific proprietary business interest of a commercial interest.

Presentations that are part of the CME activity must provide a balanced view of therapeutic options. Use of generic names will contribute to this impartiality. If the CME educational material or content includes trade names, where available trade names from several companies should be used, not just trade names from a single company

Balanced view means that recommendations or emphasis must fairly represent, and be based on, a reasonable view and valid interpretation of the information available in the subject and that no single product or service is over represented in the educational activity when other equal but competing products or services are available for inclusion.

### 6. DISCLOSURES RELEVANT TO POTENTIAL COMMERCIAL BIAS:

#### Relevant financial relationships of those with control over CME content

A disclosure must be made to the learners of any relevant financial relationship(s) for all individuals who have control over CME content. The disclosure must include the following information:

- The name of the individual
- The name of the commercial interest(s)
- The nature of the relationship the person has with each commercial interest

For an individual with no relevant financial relationship(s) the learners must be informed that no relevant financial relationship(s) exist.

### Commercial support for the CME activity

The source of all support from commercial interest(s) must be disclosed to learners. When commercial support is "in-kind" the nature of the support must be disclosed to learners.

Disclosure must never include the use of a trade name or a product-group message.

#### Timing and format of disclosure

The individual and commercial support disclosure must be made available to the learner in writing and prior to the beginning of the educational activity. In all educational formats, the learner should not be able to proceed with the activity without reasonably being expected to have encountered the disclosure information.

### VII. Standards and Policy for Enduring Materials

### Definition

MSNJ defines CME ENDURING MATERIALS are printed, recorded, or computer assisted instructional materials which may be used at various locations and which, in themselves, constitute a planned activity of continuing medical education. Examples of such materials for independent learning by physicians include programmed texts, audiotapes, videotapes, and computer assisted instructional material which either stand alone or are used in combination with written materials. They do not include reference materials such as books, journals, or manuals.

#### Standards

1. Design and use of enduring materials will be consistent with the Virtua Health CME mission statement.

2. Enduring materials will be developed and implemented based upon identified needs of Virtua Health's physician staff.

3. All enduring material will have explicit educational objectives. These objectives will be developed by the sponsor and will be communicated to the prospective participants.

4. The medium or combination of media chosen by the sponsor must be appropriate to meet the stated objectives.

5. The overall length of the recorded materials and estimated study time for completing the activity must be specified.

6. The material will contain a statement that identifies the material as a CME activity planned and produced in accordance with MSNJ Essential Areas and Elements, Standard and Policies.

7. The enduring material will be reviewed regularly - at least annually and more often if indicated by new scientific developments. This review must demonstrate that findings from the evaluation process are used in revising, updating, or planning future versions of the enduring material.

8. The date of the original release, and most recent review date if applicable, will be prominently displayed after the title.

9. Sponsors of enduring materials must have a mechanism to record and, when authorized by the participating physician, to verify participation.

10. Enduring materials or a cover letter will communicate the following to prospective participants:

- target audience of physicians
- specific learning objectives or needs addressed
- topics/education content
- faculty developing or presenting the material and their credentials
- the medium or combination of media used
- method of physician participation in the learning process

- hours of approved Category 1 Credit for the activity
- date of original release
- date of most recent review and update or approval
- evaluation methods

#### Process

1. Applications for enduring material Cat I accreditation will be submitted to the Continuing Medical Education coordinator.

2. The CME coordinator will review the application for completeness in meeting the guidelines as outlined above. This will include:

- identification of the target physician audience
- the education needs being addressed and how they were identified
- a specific statement of educational objectives
- the educational content of the enduring material
- the media to be used
- the faculty to be involved in development and/or presentation
- the method to ensure production quality
- the plan to market, distribute, and effectively encourage physician participation
- requested hours of Cat 1 credit

3. The completed application will then be presented to the CME committee for approval.

4. The CME committee will approve the application for a specified number of hours of Category 1 Credit and for a defined time interval (not to exceed 3 year).

5. The CME coordinator will assist in production of the enduring material, marketing, and distribution. This will include use of mailing lists maintained by the CME coordinator.

6. A cover letter will accompany all enduring material and include:

- target audience of physicians
- specific learning objectives or needs addressed
- topics/education content
- faculty developing or presenting the material and their credentials
- the medium or combination of media used
- method of physician participation in the learning process
- hours of approved Category 1 Credit for the activity
- date of original release
- date of most recent review and update or approval
- evaluation methods

7. There will be an annual report to the CME committee on all enduring materials including a summary of participants' evaluations, post material test results, and a financial report where appropriate. The CME committee will then use this information in deciding on re-approval.

8. Enduring Materials must also comply with the Standards for Commercial Support/Standards to Ensure Independence of CME Activities as outline in this document and the MSNJ.

### VIII. Standards for Internet CME

Live or enduring material activities that are provided via the Internet are considered to be "Internet CME." Internet CME must comply with all the MSNJ Essential Areas and Elements, Standards and Policies. However, there are special requirements for Internet CME because of the nature of the activities:

- 1. CME activities that are delivered via the internet are expected to be in compliance with MSNJ Essential Areas, Elements, and Policies.
- 2. There shall be no CME activities accredited by Virtua Health on a pharmaceutical or Device manufactures' product website.
- 3. With clear notification that the learner is leaving the educational website, links from the website of Virtua Health to a pharmaceutical and device manufactures' product website are permitted before or after the educational content of the CME activity, but shall not be embedded in the educational content of a CME activity.
- 4. Advertising of any type is prohibited within the educational content of CME activities on the internet including, but not limited to, banner ads, subliminal ads, and pop-up window ads.
- 5. Virtua Health must indicate at the start of each internet CME activity, the hardware and software required for the learner to participate.
- 6. Virtua Health must have a mechanism for the learner to be able to contact the provider if there any questions regarding the content of the CME activity.
- 7. Virtua Health will inform the learner about it policy on privacy and confidentiality that relates to CME activities Virtua provides on the internet.
- 8. Virtua Health will be able to provide documentation of its own copyright for, or has permission for use of, or is otherwise permitted to use copyrighted materials within a CME activity on the internet.

### IX. Policy on Joint Sponsorship and Co-sponsorship

### **INTRODUCTION**

Virtua Health is accredited by the Medical Society of New Jersey (MSNJ) to provide continuing medical education for physicians. Virtua Health requires that all activities which it jointly sponsors comply with the MSNJ Standards for Commercial Support and Essential Areas and Policies, and, if designated for credit, with the requirements of the American Medical Association Physician Recognition Award or other appropriate entity.

Virtua Health reserves the right to accept or deny joint sponsorship of individual CME activities at its own discretion.

At this time Virtua Health does not engage in Co-sponsorship of CME programs.

### **REQUIREMENTS FOR JOINT SPONSORSHIP**

### • Mission and Definition of CME

Applicants must read a copy of Virtua Health *CME Mission Statement*. Any CME initiative to be considered for joint sponsorship must fit the **Definition of CME** as promulgated by the MSNJ and must fall within the mission of the Virtua Health CME Program. The *CME Mission Statement* and the *MSNJ Standards for Commercial Support* (and all other forms referenced in this document) may be accessed by contacting Joanne Sebastiano CME Liason at jsebastiano or at (609) 261-7486.

### • Application

Applicants must submit an *Application for Joint Sponsorship*. The application must be completed in full and returned to Virtua Health as early in the planning process as possible to allow for necessary changes, revisions, or input into the planning and implementation process. One contact person representing the applicant must be identified at the time of application.

### <u>MSNJ</u>

All parties agree to abide by the MSNJ Standards for Commercial Support and Essential Areas and Policies, and the AMA regulations concerning the Physicians Recognition Award. The terms, condition and purposes of commercial support will be documented in the written agreement that includes Virtua Health, the Joint Sponsor and the Commercial Supporter.

### JOINT SPONSORSHIP LETTER OF AGREEMENT

Upon approval of the Application, Virtua Health and the Joint Sponsor will sign a *Joint Sponsorship Agreement* delineating all pertinent information and responsibilities.

### **IDENTIFICATION OF VIRTUA HEALTH**

Virtua Health will be clearly and prominently identified on all promotional and activity materials as a joint sponsor of the activity.

### VIRTUA HEALTH FORMS TO BE USED

It is preferred that applicants use Virtua Health forms like, *Faculty Disclosure Form* and *Activity Evaluations*; however if an outside form is favored, it must be approved by the CME Coordinator.

### **REQUIRED STATEMENTS**

Virtua Health will approve all required statements that must appear on activity materials. The statements are included in the *Application for Joint Sponsorship*.

### **DISCLOSURE**

Virtua Health requires all planning committee members, joint sponsors, teachers or authors of CME activities to disclose all relevant financial relationships with any commercial interest. Failure to comply with this request will result in non-participation or any involvement with the CME activity.

### **REVIEW OF MATERIALS**

Virtua Health must review all activity materials and reserves the right to mandate predissemination changes it feels are required for compliance with appropriate regulations or for maintenance of Virtua Health's image. The activity may not take place (or in the case of enduring materials or journal CME, may not be disseminated) until official approval is granted by Virtua Health in writing. Virtua Health will make reasonable efforts to review materials in a timely manner, but will not be responsible for delays in implementation of the activity.

### **DOCUMENTATION**

Virtua Health will define the nature of documents that the Joint Sponsor must provide to Virtua Health and the schedule for that provision.

### VIRTUA HEALTH RESPONSIBILITIES

The following responsibilities are solely those of Virtua Health and will not be delegated to the Applicant (Any deviation from this must be approved by Virtua Health in writing prior to launch of activity):

- Preparation and dissemination of certificates of credit or participation (four to six weeks following receipt of the participant list)
- Maintenance of official participant records (Applicant will also be required to maintain unofficial records for six years)

Additionally, both parties acknowledge that Virtua Health is accountable to the MSNJ for the design and implementation, including:

- Identification of CME need
- Determination of educational objectives
- Selection and presentation of content
- Selection of all persons and organizations that will be in a position to control the content
- Selection of educational methods
- Evaluation of the activity

#### FEES AND PAYMENT

Fees and payment schedule are delineated in the *Joint Sponsorship Agreement*. No other payments will be given to the director of the activity, faculty or others involved with the activity beyond the amounts stipulated in the activity budget.

#### **NOTIFICATION**

The Applicant organization will be notified in writing when its request is approved or disapproved. Promotional or activity materials may not be disseminated in advance of joint sponsorship approval

### X. Policy on Full Disclosure of Faculty Financial Interests or Relationships

Virtua Health as a sponsor accredited by the Medical Society of New Jersey (MSNJ) for Continuing Medical Education for physicians must ensure balance, independence, objectivity and scientific rigor in all it's individually sponsored or jointly sponsored educational activities. Therefore, it is our policy, that all faculty participating in our educational activities disclose to the activity audience any significant financial interest or their relationship with the manufacturer(s) of any commercial product(s) or devices discussed in their presentations. If at any time during a presentation a lecturer intends to discuss a product or device that is non-FDA approved or investigational the lecturer must disclose this information to the audience. Virtua Health does not imply that such financial interests or relationships are inherently improper or that such interests or relationships would prevent the faculty (speaker) from making a presentation. However, it is imperative that such financial interests or relationships be identified by the faculty so that participants at the CME activity may have these facts fully disclosed prior to the presentation, and may form their own judgments about the presentation.

### XI. Policy for Virtua Health's Medical Library

- Both Virtua medical libraries are accessible 24 hour a day
- Information must be accessible 24 hours a day
- Libraries have a qualified medical librarian who has a graduated degree in library sciences or equivalent training or experience.

### Voorhees Library

Location: 101 Carnie Blvd. basement level Hours: 8:30 am to 5:00 pm with 24/7 access Librarian: Catherine Mason M.S. Phone: (856) 325-3207 (x53207) Fax: (856) 325-3222

### Mt. Holly Library

Location: 1st floor Virtua Memorial Hours: 9:00 am – 5:30 am with 24/7 access Librarian: Maura Sostack, M.S. Phone: (609) 267-0700 (x43021) Fax: (609) 267-8073

### XII. Virtua Health's Requirements for Record Retention

- 1. CME Attendance Records will be recorded in Medical Affairs and when authorized by the participating physician, participation will be verified for six years from the original date of the CME activity.
- 2. Medical Affairs will retain activity files/records of CME planning and presentation during the current accreditation term. Maintenance of this documentation will allow Virtua Health to provide MNSJ with evidence of adherence to MSNJ Essential Areas and Elements, Standards and Policies at the time of reaccredidation or if MSNJ would investigate any complaints would be lodged against Virtua Health.

### XIII. POLICY ON HONORARIA

### **PURPOSE**

This policy outlines the payment of honoraria and reimbursement of out-of-pocket expenses for contributors to CME activities accredited by Virtua Health. This policy is established in accordance with requirement 3.7 of the ACCME Standards for Commercial Support.

### **POLICY**

Virtua Health is accredited by the Medical Society of the New Jersey (MSNJ) to provide continuing medical education for physicians. Virtua Health complies with the ACCME Standards for Commercial Support in providing CME that is free of the control of commercial interests.

#### **RESPONSIBILITY**

A. Honoraria amounts will be negotiated by the Virtua Health department taking responsibility for the CME activity and shall be based on fair market value with the realization that the amounts will vary with the specialty, subspecialty, speaker qualifications, length and number of presentations, nature of the conference, preparation and travel time. It must be noted that if there is outside commercial support for the CME activity, the amount of honoraria must be reached independent of that support.

B. In compliance with the ACCME Standards for Commercial Support, no individual (activity director, speaker, moderator, planning committee member, etc) may receive payment directly from a commercial interest for honoraria, travel or out-of-pocket expenses.

C. If there are questions about appropriate honoraria, the activity director should consult with the Medical Director of CME. The Medical Director of CME and/or the CME Committee may challenge unusually high honoraria.

#### **CONTROL**

Virtua Health's CME Committee will review the amount and source of the honoraria and estimated travel expenses prior to the CME activity.

### XIV Attachments

- a. Virtua CME Activity Planning WORKSHEET
- b. Commercial Support Agreement
- c. Announcement-Virtua CME
- d. Virtua Joint Sponsorship Application
- e. CME Disclosure Form
- f. Attendance Certificate
- g. CME Sign In Sheet
- h. CME Evaluation Form