

December 2019



**Procedures and Forms
For Submitting
An ISMS CME Activity Planning Proposal**

ILLINOIS STATE MEDICAL SOCIETY

Procedures for Submitting a CME ACTIVITY PLANNING PROPOSAL and Receiving Approval to Award *AMA PRA Category 1 Credit™*

Any ISMS council, committee, division, or component medical society, or non-accredited educational partner that would like to present a CME activity and have the activity certified for *AMA PRA Category 1 Credit™* needs to follow the procedures described below, including submitting a planning proposal and all necessary documentation, a minimum of 45 working days before final publicity materials being printed. **Failure to do so will result in ISMS not being able to award *AMA PRA Category 1 Credit™*.**

Independence

Perception exists that independence can be threatened by the influence of individuals with a financial stake in the outcome of CME. Therefore, ISMS must be able to show that when planning a CME activity for which ISMS is asked to award *AMA PRA Category 1 Credit(s)™*, the following decisions leading up to the planning and implementation of the activity are free of the control of a commercial interest:

- Identification of 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

Conflict of Interest – Protecting Against Commercial Bias

The ACCME Standards for Commercial Support require that ISMS have in place a mechanism to identify and resolve conflicts of interest. Any planning committee member, faculty or author that has a relevant financial relationship with a commercial interest **and** is in a position to influence content of the CME activity is considered to have a conflict of interest.

In addition, it is expected that the content or format of CME activities or related materials must promote improvements or quality and not a specific proprietary business interest of a commercial interest. Disclosure information and questions regarding bias are included on ISMS evaluation forms as ways to monitor and prevent bias. It is required that the ISMS evaluation form be used in addition to any other evaluation tool planning committees may wish to use. The ACCME Standards for Commercial Support are included with this packet of information.

Resolution of Conflicts of Interest

The ISMS has developed the following process to resolve conflicts of interest:

Planning Committee Members

1. Prior to participation on the planning committee, committee members must disclose if they have any relevant financial relationships that could affect the content of the educational activity. **Planning committees must have a majority of members who do not have such relevant financial relationships.** In addition, where planning committee members disclose a relevant financial relationship, ISMS requires documentation of resolution of conflict of interest. It is recommended that you use the ISMS sample

letter for planning committee members as a way to introduce your planning committee members to this requirement.

2. **If there is a relevant financial relationship on the part of any planner, the provider must take an active role to resolve that conflict by recusing the planner from controlling aspects of planning and content with which they have a conflict of interest.**
3. All planning committee members must complete an ISMS disclosure form prior to their participation on a planning committee. Individuals who do not complete the disclosure form cannot participate in the planning committee.
4. Planning committee member disclosure forms must be submitted at the same time that the ISMS CME Activity Planning Proposal is submitted for review and approval.
5. ISMS will be unable to consider an ISMS CME Activity Planning Proposal that does not include disclosure information for all planning committee members.

Faculty, Authors and Content Reviewers

1. Once faculty/authors have been identified, **it is required** that they be sent the ISMS-developed faculty invitation letter **and** disclosure form. The faculty invitation letter contains information about the need for the CME activity, what we expect to achieve by conducting this activity, and the learning objectives (see attached sample letter). The faculty invitation letter is designed to help faculty/authors be clear as to what is expected of their presentations/enduring materials and to ensure that the planners are in control of educational design.
2. The disclosure form is meant to identify any conflicts of interest that exist because of relevant faculty/author/content reviewer relationships with commercial interests that may influence their presentation/enduring material. Signed copies of the ISMS Disclosure of Relevant Financial Relationships Statement **must be forwarded to ISMS as part of the CME ACTIVITY PLANNING PROPOSAL**. Failure of the faculty to sign disclosure statements will result in ISMS requiring replacement faculty to be identified.
3. If any faculty/authors have relevant financial relationships that can affect the content of the educational activity **AND** that have occurred within the last 12 months, a detailed outline of the faculty/author presentation/enduring material or their computerized slide presentation with peer-reviewed references or best available evidence **must** be submitted as part of the CME ACTIVITY PLANNING PROPOSAL for review by the chair of the ISMS Committee on CME Activities or his/her designee. It is suggested that the joint provider's planning committee review these materials in advance of sending them to ISMS and work with faculty/authors to make changes as needed, or to identify alternative faculty if the conflict cannot be resolved.
4. The chair of the ISMS Committee on CME Activities or his/her designee will review such presentations/enduring materials to determine if they are free of promotional, commercial and/or sales activities. If it is determined that a presentation/enduring material is not free of promotional, commercial and/or sales activities, the committee will require the planning committee to have the faculty/author make changes to the material, replace the faculty/author, or withdraw the planning proposal until such time as changes can be made.
5. For CME activities that are composed of several sessions, if, after going through the review process, it is determined that a conflict of interest cannot be resolved for one of the sessions and the planning committee believes that the session is important to the learners, the Committee on CME Activities would allow the session to be included as part of the CME offering even though credit could not be awarded for the session. This possibility would be considered only after all possible options to resolve the conflict have been attempted.
6. It is **required** that the ISMS evaluation be used with all CME activities since this evaluation asks specific questions about bias in presentations/enduring materials. Planning committees are encouraged to use additional evaluation tools in addition to the one required by ISMS.

Disclosure to Participants

1. Planning committee members' disclosure must be made in writing to participants before the start of the CME presentation/enduring material. Specific language as to disclosure statements will be provided prior to the CME activity.
2. Faculty/Authors' disclosure must be made in writing to participants before the start of the CME presentation/enduring material. Specific language as to disclosure statements will be provided prior to the CME activity.
3. A draft copy of the disclosure statement must be submitted to ISMS for approval prior to the activity; or ISMS Education and Accreditation staff will provide this to the joint provider.

Use of Commercial Support

1. All commercial support must be paid directly to ISMS or to a joint provider. A Letter of Agreement (LOA) must be used with all organizations providing commercial support (either educational grants or in-kind contributions) for the activity. This agreement must be signed by a representative of the ISMS Division of Education and Accreditation, the chair of the planning committee and a representative of the commercial supporter. While it is recommended that the ISMS LOA be used, ISMS will review and sign Letters of Agreement provided by commercial supporters as long as they meet the intent of the Standards of Commercial Support.
2. In those cases where ISMS works with a joint provider and the commercial supporter requires that ISMS receive the educational grant as the accredited provider, ISMS will do so in accordance with the ISMS Policy on Fees for Accepting Education Grants for Joint Providers (see ISMS Joint Providership Agreement).
3. ISMS will not release the grant if it is given directly to the planning committee, if a required LOA is not provided or if it is not signed by the appropriate parties. If the planning committee receives the funds directly but does not furnish signed LOAs to ISMS, ISMS will not issue CME certificates.
4. All educational grants or in-kind contributions must be acknowledged in publicity materials and/or activity materials. A copy of this acknowledgment must be provided to the ISMS Division of Education and Accreditation prior to the CME activity.

Honoraria and Expenses

1. ISMS expects that notice of honoraria for planning committee members/faculty/authors will be provided as part of the CME Activity Planning Proposal.
2. ISMS expects that reimbursement for out-of-pocket expenses be provided in accordance with the organization's policy on reimbursement. For organizations other than ISMS and ISMIE Mutual, the expense reimbursement policy must be submitted as part of the CME Activity Planning Proposal.
3. ISMS and its joint providers are expected to pay directly to planning committee members/faculty/authors any honoraria or out-of-pocket expenses in compliance with the organization's policies.
4. If commercial support is provided, no other payment shall be given to the director of the activity, planning committee members, faculty or authors, joint provider or any others involved with the supported activity.
5. Expenses can be reimbursed and honoraria can be paid only for the time that faculty/authors conduct or facilitate a presentation or session, but not for any time they spend as learners.
6. After each activity, the staff coordinator is required to complete an ISMS CME Activity Evaluation Summary Worksheet.

Managing Commercial Promotion for the CME Activity

1. Exhibits are not considered commercial support and Letters of Agreement are not required with exhibitors.
2. Exhibits cannot be placed in the same room as the educational activity(ies) certified for CME credit; likewise, CME educational sessions cannot be conducted in exhibit areas.
3. Promotional/advertising activities must be kept separate from CME.
4. Please see the attached Standards for Commercial Support for all requirements related to exhibits, advertising and promotion. ISMS provides a sample memo to exhibitors detailing the relevant standards.

Submitting the CME ACTIVITY PLANNING PROPOSAL

1. For Joint Providers, a signed Joint Providership Agreement must be submitted by the joint provider before or at the time that the CME Activity Planning Proposal is submitted for consideration. Failure to submit a signed joint providership agreement will delay the review process.
2. Prepare a CME Activity Planning Proposal: In preparation for submission, it is advised that the CME planner contact the Division of Education and Accreditation to receive assistance from the educational staff in completing the form and assuring that all necessary documentation for *AMA PRA Category 1 Credit™* is complete.
3. At the time of submission, the required documentation **must** accompany the CME Activity Planning Proposal. **The proposal will not be considered** if the following attachments are not provided at the time the proposal is submitted. Documentation includes:
 - Completed disclosure forms for all planners and, if available, speakers, authors and content reviewers.
 - Hard copies of sources used to identify needs and gaps, (can include links to websites)
 - Copies of correspondence between the planner(s) and faculty showing discussion of objectives, honoraria and reimbursement of expenses, if applicable.
 - Draft publicity materials and/or activity Agenda (indicating number of continuing medical education credits requested)
 - Copy of honoraria policy
 - Completed MOC Appendix and Peer Review forms, if applicable.
 - Signed Joint Providership Agreement (if applicable)
4. Prior to the CME activity: The following must be submitted or discussed with the CME Department:
 - Remaining disclosure forms (forms not previously submitted) for speakers, authors and content reviewers.
 - Documentation of resolution of conflict of interest, if applicable.
 - Documentation showing how disclosure of financial relationships will be communicated to attendees.
 - Documentation showing how disclosure of commercial support will be communicated to attendees.
 - Signed Letters of Agreement, if commercial support is sought.
 - Examples of any supplemental educational material(s) provided to participants.
 - CME Credit Request Form (live activities only) (provided by ISMS Education Staff)

- CME Evaluation form or other evaluation tool, as applicable (provided by ISMS Education Staff)
 - Correspondence with exhibitors, if applicable.
 - Signed Presentation Permission Forms for copyright and videotaping purposes, if applicable.
 - For Internet Enduring Activities, CME office must be contacted prior to Go Live date to confirm CME information is correct.
5. Following the activity, the following must be submitted to the CME department:
- Final publicity materials
 - Copies of handouts provided to participants, if any
 - Participant evaluation forms (live activities only)
 - All CME Credit Request Forms collected (live activities only)
 - Documentation of Honoraria and/or expenses paid
 - Completed ISMS Motion Worksheet, if requested by ISMS staff.
 - Attendance numbers, including breakdown of physician vs. non-physician attendees.
 - Participant data via Excel spreadsheet, if MOC activity (includes ABIM, ABA or ABP ID, name, date of birth, and activity completion date)
6. The CME Activity Planning Proposal and all necessary documentation should be submitted to the Division of Education and Licensure **A MINIMUM OF 45 WORKING DAYS** before final publicity materials are printed. If a save the date or announcement brochure is printed specifically for the activity, then this planning proposal should be submitted **six weeks prior to the brochure copy being sent out for printing**.
7. **AMA PRA Category 1 Credit™ cannot be designated retroactively for a CME activity.** CME activity publicity materials cannot carry any statement about AMA PRA category 1 credit until after the Committee on CME Activities has reviewed and approved the CME Activity Planning Proposal and requisite attachments. If a CME activity's publicity materials carry **AMA PRA Category 1 Credit™** designation statements before the ISMS Committee on CME Activities approval process is completed, the activity will automatically be disqualified from further consideration.
8. Once the CME Activity Planning Proposal is received in the Division of Education and Accreditation, it will be reviewed for completeness. If it appears to be complete, it will be included in the agenda of the ISMS Committee on CME Activities for review and approval at its next meeting. If the form is missing any necessary information, the educational staff will confer with the CME planner who initiated the request and advise him/her of what is needed to complete the application. If the CME activity is scheduled to occur before the Committee on CME Activities next scheduled meeting, the chairman of that committee may convene a telephone conference call to discuss the matter, disseminate a e-mail ballot for activity approval or, alternatively, act in the name of the committee and either approve or disapprove the request.
9. Please see information under **Conflict of Interest** above regarding how the committee will handle faculty/author conflicts of interest.
10. Once the CME Activity Planning Proposal has been approved, a signed copy of this form will be sent to the CME planner initiating the request, as well as language to be used for making disclosure for planning committee members/faculty/authors to participants. An activity documentation file will be set up for the activity by staff in the Division of Education and Accreditation, who also will prepare CME credit requests and evaluation forms customized for the CME activity. These items will be forwarded to the CME planner about three weeks prior to the activity.

11. CME Planners are responsible for faculty selection, publicity, handout preparation, speaker arrangements, making planning committee/faculty/author disclosure to participants, acknowledging commercial support, registration, dissemination of CME credit requests and evaluations, and all other activity announcements. Please note that to insure compliance with ACCME accreditation standards, materials promoting CME activities must include the following information:

- Activity title
- Date/time
- Location
- Learning objectives
- Faculty name(s)/affiliation(s)
- Target audience
- Credit designation statement
- Statement of accreditation
- Acknowledgement of outside/commercial support, if any.

The joint provider will provide reasonable travel expenses so that either the ISMS staff member or an ISMS Council/Committee physician member can attend the jointly provided educational activity to monitor implementation of the Updated Criteria for Compliance and policies.

12. At the conclusion of the activity, participant evaluations and CME credit requests, along with registration information, should be collected and sent to the Division of Education and Accreditation staff within 10 days of an activity's completion. CME certificates will then be processed and mailed from ISMS headquarters within approximately four weeks. A summary of the evaluation forms and a listing of those to whom a certificate was issued will be forwarded to the CME planner.

13. CME planners are required to submit final copies of promotional materials, activity handouts and a staff report for each activity. These items are necessary for ISMS to maintain its accredited status and will enable us to continue this service. An ISMS CME Activity Evaluation Summary Worksheet which is a high-level summary of the evaluation data, and how it will influence future programs must be submitted to ISMS within 60 days of an activity's completion.

14. If this activity is an online activity, a copy of all screens may be submitted to ISMS in hardcopy or on a CD/DVD/USB, or in an e-mail to ISMS.

15. The ACCME Standards for Commercial Support are attached and must be applied to all CME activities whether or not commercial support is provided.