**Documentation Review Form Questions for 2024 Cohorts**

**ALL CRITERIA, STANDARDS & POLICIES**

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**EDUCATIONAL NEEDS**

The provider incorporates into CME activities the educational needs (knowledge, competence, or performance) that underlie the professional practice gaps of their own learners.

**SURVEYOR QUESTION(S)**

* *Did the provider incorporate the educational needs (knowledge, competence, or performance) that underlie the professional practice gap(s) of their own learners for this activity?*

*Choose an item.*

* *If you indicated no or the criterion was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**DESIGNED TO CHANGE**

The provider generates activities/educational interventions that are designed to change competence, performance, or patient outcomes as described in its mission statement.

**SURVEYOR QUESTION(S)**

* *Did the provider design this activity to change competence, performance, or patient outcomes as described in its mission statement?*

*Choose an item.*

* *If you indicated no or the criterion was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**APPROPRIATE FORMATS**

The provider chooses educational formats for activities/interventions that are appropriate for the setting, objectives, and desired results of the activity.

**SURVEYOR QUESTION(S)**

* *Did the provider choose an educational format for this activity that is appropriate for the setting, objectives, and desired results of the activity?*

*Choose an item.*

* *If you indicated no or the criterion was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**COMPETENCIES**

The provider develops activities/educational interventions in the context of desirable physician attributes [e.g., Institute of Medicine (IOM) competencies, Accreditation Council for Graduate Medical Education (ACGME) Competencies].

**SURVEYOR QUESTION(S)**

* *Did the provider develop this activity in the context of desirable physician attribute(s)?*

*Choose an item.*

* *If you indicated no or the criterion was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**ANALYZES CHANGE**

The provider analyzes changes in learners’ (competence, performance, or patient outcomes) achieved as a result of the overall program's activities/educational interventions.

**SURVEYOR QUESTION(S)**

* *Did the provider demonstrate that it generated data or information from the activity about changes achieved in learners’ competence or performance or patient outcomes?*

*Choose an item.*

* *If you indicated no or the criterion was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**STANDARD 1: ENSURE CONTENT IS VALID**

Accredited providers are responsible for ensuring that their education is fair and balanced and that any clinical content presented supports safe, effective patient care.

1. All recommendations for patient care in accredited continuing education must be based on current science, evidence, and clinical reasoning, while giving a fair and balanced view of diagnostic and therapeutic options.
2. All scientific research referred to, reported, or used in accredited education in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection, analysis, and interpretation.
3. Although accredited continuing education is an appropriate place to discuss, debate, and explore new and evolving topics, these areas need to be clearly identified as such within the program and individual presentations. It is the responsibility of accredited providers to facilitate engagement with these topics without advocating for, or promoting, practices that are not, or not yet, adequately based on current science, evidence, and clinical reasoning.
4. Organizations cannot be accredited if they advocate for unscientific approaches to diagnosis or therapy, or if their education promotes recommendations, treatment, or manners of practicing healthcare that are determined to have risks or dangers that outweigh the benefits or are known to be ineffective in the treatment of patients.

**SURVEYOR QUESTION(S)**

* *Does the information submitted by the provider demonstrate that the content of the activity meets the expectations of Standard 1?*

*Choose an item.*

* *If you indicated no to any of the questions or the standard was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**STANDARD 2: PREVENT COMMERCIAL BIAS AND MARKETING IN ACCREDITED CONTINUING EDUCATION**

Accredited continuing education must protect learners from commercial bias and marketing.

1. The accredited provider must ensure that all decisions related to the planning, faculty selection, delivery, and evaluation of accredited education are made without any influence or involvement from the owners and employees of an ineligible company.
2. Accredited education must be free of marketing or sales of products or services. Faculty must not actively promote or sell products or services that serve their professional or financial interests during accredited education.
3. The accredited provider must not share the names or contact information of learners with any ineligible company or its agents without the explicit consent of the individual learner.

**SURVEYOR QUESTION(S)**

* *Did the provider attest to meeting all three elements of Standard 2?*

*Choose an item.*

* *If you indicated no to the question or the standard was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**STANDARD 3: IDENTIFY, MITIGATE, AND DISCLOSE RELEVANT FINANCIAL RELATIONSHIPS**

Many healthcare professionals have financial relationships with ineligible companies. These relationships must not be allowed to influence accredited continuing education. The accredited provider is responsible for identifying ***relevant financial relationships*** between individuals in control of educational content and ineligible companies and managing these to ensure they do not introduce commercial bias into the education. Financial relationships of any dollar amount are defined as relevant if the educational content is related to the business lines or products of the ineligible company.

Accredited providers must take the following steps when developing accredited continuing education. Exceptions are listed at the end of Standard 3.

1. **Collect information:** Collect information from all planners, faculty, and others in control of educational content about all their financial relationships with ineligible companies within the prior **24 months**. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies. Individuals must disclose regardless of their view of the relevance of the relationship to the education. Disclosure information must include:

1. The name of the ineligible company with which the person has a financial relationship.
2. The nature of the financial relationship. Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual’s institution receives the research grant and manages the funds.

2. **Exclude owners or employees of ineligible companies:** Review the information about financial relationships to identify individuals who are owners or employees of ineligible companies. These individuals must be excluded from controlling content or participating as planners or faculty in accredited education. There are three exceptions to this exclusion—employees of ineligible companies can participate as planners or faculty in these specific situations:

1. When the content of the activity is not related to the business lines or products of their employer/company.
2. When the content of the accredited activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations.
3. When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.

3. **Identify relevant financial relationships:** Review the information about financial relationships to determine which relationships are relevant. Financial relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.

4. **Mitigate relevant financial relationships:** Take steps to prevent all those with relevant financial relationships from inserting commercial bias into content.

1. Mitigate relationships prior to the individuals assuming their roles. Take steps appropriate to the role of the individual. For example, steps for planners will likely be different than for faculty and would occur before planning begins.
2. Document the steps taken to mitigate relevant financial relationships.

5. **Disclose all relevant financial relationships to learners:** Disclosure to learners must include each of the following:

1. The names of the individuals with relevant financial relationships.
2. The names of the ineligible companies with which they have relationships.
3. The nature of the relationships.
4. A statement that all relevant financial relationships have been mitigated.

**Identify ineligible companies by their name only.** Disclosure to learners must not include ineligible companies’ corporate or product logos, trade names, or product group messages.

**Disclose absence of relevant financial relationships.** Inform learners about planners, faculty, and others in control of content (either individually or as a group) with no relevant financial relationships with ineligible companies.

**Learners must receive disclosure information, in a format that can be verified at the time of accreditation, before engaging with the accredited education.**

**Exceptions:** Accredited providers do not need to identify, mitigate, or disclose relevant financial relationships for any of the following activities:

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 self-directed education where the learner controls their educational goals and reports on changes that resulted, such as learning from teaching, remediation, or a personal development plan. When accredited providers serve as a source of information for the self-directed learner, they should direct learners only to resources and methods for learning that are not controlled by ineligible companies.

**SURVEYOR QUESTION(S)**

* *If the provider indicated that the activity did not require the identification, mitigation, and disclosure of relevant financial relationships, because it met one of three exceptions listed in Standard 3, please indicate if you agree that the activity met one of the exceptions.*

*Choose an item.*

* *If you indicated no or the exceptions of this standard were discussed in the interview, please provide a detailed explanation.*

Enter Response Here

* *Did owner(s)/employee(s) of ineligible companies participate as planners or faculty in this activity?*

*Choose an item.*

* *If owner(s)/employee(s) of ineligible companies participated as planners or faculty in this activity, did their participation meet one of the three exceptions listed in Standard 3.2?*

*Choose an item.*

* *If you indicated no or the use of owners/employees for this activity was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

* *Did an ineligible company take the role of non-accredited partner in a joint provider relationship in this activity?*

*Choose an item.*

* *If you indicated no or the role of an ineligible company as non-accredited partner in a joint provider relationship was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

* *Did the provider's example of each of the form(s) or mechanism(s) used to collect information include the following, appropriate to the time the activity was planned and offered:*

*a. the complete definition of an ineligible company/commercial interests*

*b. instructions to include ALL financial relationships with ineligible companies for the prior 12 or 24 months, depending on when the activity was planned and implemented. Activities planned and implemented after January 1, 2022 should require the person completing the form to list all financial relationships with ineligible companies for the prior 24 months.*

*Choose an item.*

* *If you indicated no or the collection of financial relationships for this activity was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

* *Did the provider indicate in the spreadsheet the action(s) it took to mitigate relevant financial relationships for all individuals in control of CME content and were the action(s) appropriate to the role(s) of the individual?*

*Choose an item.*

* *If you indicated no or identifying and mitigating relevant financial relationships for this activity was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

* *Did the provider demonstrate that it disclosed the presence or absence of relevant financial relationships for all individuals in control of CME content, including a statement that all relevant financial relationships were mitigated, if applicable, as presented to learners prior to the activity?*

*Choose an item.*

* *If you indicated no or the disclosure of relevant financial relationships and/or mitigation for this activity was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**STANDARD 4: MANAGE COMMERCIAL SUPPORT APPROPRIATELY**

Accredited providers that choose to accept ***commercial support*** (defined as financial or in-kind support from ineligible companies) are responsible for ensuring that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. The support does not establish a financial relationship between the ineligible company and planners, faculty, and others in control of content of the education.

1. **Decision-making and disbursement:** The accredited provider must make all decisions regarding the receipt and disbursement of the commercial support.

1. Ineligible companies must not pay directly for any of the expenses related to the education or the learners.
2. The accredited provider may use commercial support to fund honoraria or travel expenses of planners, faculty, and others in control of content for those roles only.
3. The accredited provider must not use commercial support to pay for travel, lodging, honoraria, or personal expenses for individual learners or groups of learners in accredited education.
4. The accredited provider may use commercial support to defray or eliminate the cost of the education for all learners.

2. **Agreement:** The terms, conditions, and purposes of the commercial support must be documented in an agreement between the ineligible company and the accredited provider. The agreement must be executed prior to the start of the accredited education. An accredited provider can sign onto an existing agreement between an accredited provider and a commercial supporter by indicating its acceptance of the terms, conditions, and amount of commercial support it will receive.

3. **Accountability:** The accredited provider must keep a record of the amount or kind of commercial support received and how it was used, and must produce that accounting, upon request, by the accrediting body or by the ineligible company that provided the commercial support.

4. **Disclosure to learners:** The accredited provider must disclose to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education. Disclosure must not include the ineligible companies’ corporate or product logos, trade names, or product group messages.

**SURVEYOR QUESTION(S)**

* *Did the provider demonstrate that it has written agreements that [1] include the ineligible company and the accredited provider [2] are executed prior to the start of the accredited education [3] specify terms and conditions of the commercial support that would meet ACCME expectations and [4] include all commercial supporters for this activity?*

Select Not Applicable if the provider did not receive commercial support for this activity.

*Choose an item.*

* *Did the provider demonstrate that it disclosed to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education?*

Select Not Applicable if the provider did not receive commercial support for this activity.

*Choose an item.*

* *If you indicated no to any of the questions or the standard was discussed in the interview, please provide a detailed explanation.*

Enter Response Here

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**ACCREDITATION STATEMENT POLICY**

The accreditation statement must appear on all CME activity materials and brochures distributed by accredited organizations, except that the accreditation statement does not need to be included on initial, save-the-date type activity announcements. Such announcements contain only general, preliminary information about the activity such as the date, location, and title. If more specific information is included, such as faculty and objectives, the accreditation statement must be included.

The ACCME accreditation statement is as follows:

For directly provided activities: “The (name of accredited provider) is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians.”

For jointly provided activities: “This activity has been planned and implemented in accordance with the accreditation requirements and policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint providership of (name of accredited provider) and (name of nonaccredited provider). The (name of accredited provider) is accredited by the ACCME to provide continuing medical education for physicians.”

**SURVEYOR QUESTION(S)**

* *Did the provider utilize the appropriate accreditation statement and present it to learners?*

*Choose an item.*

* *If you indicated no or the policy was discussed in the interview, please provide a detailed explanation.*

Enter Response Here