

Policy Title: JOINT PROVIDERSHIP POLICY
Revised and Approved by CME Committee: May 5, 2014 Approved by Board of Directors: May 5, 2014 Revised and Approved by CME Committee: March 27, 2017 Approved by Board of Directors: April 10, 2017 Reviewed by CME Committee: January 31, 2019 Reviewed by Board of Directors: February 8, 2019 (email)
Relevance: <input checked="" type="checkbox"/> CME <input type="checkbox"/> BOARD <input type="checkbox"/> Personnel

INTRODUCTION:

As a provider accredited by the Washington State Medical Association (WSMA) to provide continuing medical education, the Benton Franklin County Medical Society (BFCMS) may chose to participate in joint providership.

The WSMA defines joint providership as the “providership of a CME activity by one accredited and one non-accredited organization.”

The WSMA expects both directly provided and jointly provided CME activities to be in compliance with their accreditation requirements. In cases of joint providership, it is the responsibility of the accredited provider (BFCMS) to be able to demonstrate through written documentation this compliance to the WSMA.

GUIDELINES:

The WSMA allows accredited providers and non-accredited organizations (if they are not American Council of Continuing Medical Education (ACCME) defined commercial interests) to collaborate in the planning and implementation of CME activities through joint providership. The ACCME defines commercial interests as “any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.” The ACCME does not consider providers of clinical service directly to patients to be commercial interests. Within the context of this definition and limitation, the ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME:

- 501-C Non-profit organizations (Note, ACCME screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint sponsor, but they can be a commercial supporter.)
- Government organizations
- Non-health care related companies

- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For profit rehabilitation centers
- For-profit nursing homes
- Blood banks
- Diagnostic laboratories

In joint providership, either the accredited provider or its non-accredited joint provider can control the identification of CME needs, the determination of educational objectives, the selection and presentation of content, the selection of all persons and organizations that will be in a position to control CME content, the selection of educational methods, and the evaluation of the activity.

The accredited provider must be able to provide the WSMA with written documentation that demonstrates how each jointly provided CME activity was planned and implemented in compliance with the WSMA's Accreditation Policies and Procedures. Material submitted can be from files of either the accredited provider or the non-accredited provider.

POLICY:

- All jointly provided activities will support the CME Mission Statement of the Benton Franklin County Medical Society. The CME Administrator will be involved in the planning of all jointly provided activities.
- The BFCMS or WSMA Planning Document will be utilized for all jointly provided activities and will be completed by the CME Administrator and the activity planning committee. Before beginning the application process, the activity planning committee will present a brief description of the program to the BFCMS CME Committee. If the CME Committee approves, the application may proceed.
- The CME Administrator will present the completed planning document and supporting documentation to the CME Committee at least 90 days prior to the activity for approval. The activity planning committee will be responsible for providing the following documentation: Disclosure forms for the planning committee and faculty, draft budget, CV's of all faculty, draft agenda, draft brochure draft evaluation form and any letters of agreement.
- The activity cannot be advertised as offering Category I CME until it is approved by the CME Committee and the accreditation statement is supplied to the activity planning committee. At that point, the accreditation must be used on all materials advertising credit and on certificates distributed at the activity.

- The activity planning committee will be provided with and is expected to follow the BFCMS Standards for Commercial Support Policy. They will also be provided with and expected to follow the Disclosure of Financial Relationships policy and forms.
- Activity evaluation summary is the responsibility of the activity planning committee and will be forwarded to the CME Administrator within 45 days of the completion of the activity. The activity evaluation must contain data or statistics that relate to changes in learners' competence, performance or patient outcomes achieved as a result of the activity. The following documents must also be provided within 45 days of the completion of the activity: sign-in sheets (MD/DO separate from "other" providers), certificate of attendance, final budget, final brochure (if different from the draft).
- If two or more accredited providers are involved in an activity, then one of them must assume responsibility for the activity and this must be clearly indicated through the appropriate accreditation statement.
- BFCMS will withdraw from any jointly provided activity if the non-accredited sponsor fails to comply with this policy.
- BFCMS reserves the right to refuse to enter into joint providership with a non-accredited organization for any reason whatsoever, regardless of the organizations willingness to comply with this policy.
- BFCMS will not assist with or apply for category I CME credits for other disciplines (pharmacy, nursing, etc.)

FEE STRUCTURE

Credit Hours	Application Fee	Service Fee
0-2	300	50/credit hour
2-5.5	400	50/credit hour
5.75-10.5	500	50/credit hour
10.75-25	750	50/credit hour

First Time Applicants: First time applicants will be charged an additional \$200.00 orientation fee. This fee is assessed for first time applicants to cover the additional time required of the CME Administrator to educate the applicant on the CME policies, procedures and requirements. This fee may be waived depending on the CME experience of the applicant.

Industry Support/Commercial Support:

If the activity is receiving any industry/commercial support, the total fee will increase by 20%. This will help to offset the cost of managing funds, reviewing

commercial support agreements and increased monitoring to ensure ACCME compliance.