

CME Dos and Don'ts

Do

1. Brochures/flyers/electronic announcements/etc must be pre-approved by the Office of Continuing Medical Education (OCME) before distribution.
2. Instructions for pursuing commercial support:

Notify OCME if you are pursuing financial support. All financial support must be in the form of an educational grant and preceded by a Letter of Agreement (LOA). If you are completing the solicitation letter or grant application (hard copy or online), you complete the form as a representative of DUCOM/ OCME – entering the contact information for DUCOM/OCME. DUCOM is the Provider/sponsor/applicant. In some cases, the application (or commercial supporter) allows for the identification of a joint sponsor or designee for receipt of funds. In this case only, can you include the name of your department or institution. Forward the draft application or provide OCME with the online access code for review before completion.

The LOA is between and signed by the commercial supporter and DUCOM's Assistant Dean, Office of Continuing Medical Education as the Accredited Provider. Checks are made payable to ***Drexel University College of Medicine*** or our approved designee. Return a fully executed copy of the LOA to OCME.

3. Content, planning and selection of speakers for a CME activity must be free from commercial interest and influence. The program director for the activity must ensure that presentations are not promotional, are evidenced based, hold no commercial bias and potential conflicts of interest have been resolved.
4. CME oversight authorities caution us against selecting speakers whose fiduciary responsibility is to a commercial interest. However, if you do, you must take every precaution to document that this activity meets strict compliance requirements and potential conflicts of interest have been adequately resolved. Speakers with potential conflicts and/or fiduciary responsibilities to a commercial interest must submit their presentation for content validation review at least three to four weeks prior to the activity.
5. A speaker's commercial relationships (or lack of relationships) and method of resolution must be announced to the audience prior to the presentation. **If the Disclosure form is not received prior to the event, the presenter can not participate in the CME activity**
6. The *Verification and Resolution Form* is the program director's confirmation that all compliance requirements were addressed before and during the CME activity. The form must be signed and dated by the program director **after** the activity and forwarded to the OCME.
7. CME credit is **not released** if all speaker Disclosures and the signed Verification form are not on file in the OCME.
8. The *Disclosure of Relationships and Declaration Form* must be completed by each planning committee member and submitted with the CME application.

9. The *Disclosure of Relationships and Declaration Form* must be completed by and forwarded for each speaker at least 4-8 weeks prior to the activity.
10. The standard honorarium ranges from \$0 to \$2,000. If the honoraria will exceed \$2,500, the program director must forward a memo to OCME documenting the extenuating circumstances.
11. Have an evaluation process for all CME activities
12. Evaluations must be collected, tabulated and submitted to the OCME.
13. A financial report (program budget summary) and copies of all financial transactions (sponsor checks, check requests, honoraria payments, invoices, etc.) must be provided to DUCOM.
14. Signatures of attendees have to be legible on attendance sheets
15. Grand Round Attendance Sheets for those requesting CME should be separate from Residents and Students. If a visitor, attendee must print name clearly, affix signature, provide contact information and indicate they want CME tracked (there is a fee for non-DUCOM attendees). If the form requires attendee to circle status (A=Attending, R=Resident, F=Fellow, etc), check to be sure it has been circled before sending to the OCME.

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Don't

1. Commercial supporter/marketing representative cannot select the content, topic or speaker for accredited CME events.
2. A CME event cannot be promotional.
3. Commercial supporter cannot directly pay the speaker honorarium or any other program related expenses.
4. Commercial supporter cannot make the dinner arrangements at the restaurant and pick up the check
5. Commercial supporter/marketing rep cannot "drop by" with lunch for or during a CME accredited activity. **All financial support must be in the form of an educational grant to DUCOM.**
6. Neither the commercial supporter, marketing representative or the speaker can determine the amount of the honorarium. The program director sponsoring the event determines the honorarium. Honoraria exceeding \$2,500 require a memo from the program director to OCME, documenting the extenuating circumstances.
7. No commercial marketing material in the room where the educational activity takes place.
8. Don't forget to update the OCME when there are changes to your CME administrative staff.