

	Policy on Honoraria and Out-of-Pocket Expenses for Planners, Teachers and Authors of Continuing Medical Education (CME) Activities Policy Number: 3.6.3	Type:	TIER 3
		Original Effective Date:	January 24, 2005
		Current (Revised) Date:	June 2008; April 2012; June 2013
		Contact:	OFFICE OF CONTINUING MEDICAL EDUCATION
Approval Signature:		Date Approved:	
Typed Name and Title:			

1) General Policy Statement (Entities Affected /Responsible Party for Implementation)

It is the policy of Wake Forest Baptist Medical Center (WFBMC) to permit Wake Forest School of Medicine (WFSM) faculty and planners as well as invited teachers and authors to be paid for their participation in continuing medical education (CME) activities without influence by any individuals or groups. It is recognized that both faculty and the Institution may enter into financial or other materially beneficial relationships with commercial interests, but these relationships cannot dictate honoraria levels. The purpose of this Policy is to describe appropriate behavior on the part of faculty members and the Institution.

Institutional policy states honoraria higher than \$1500 per day must be approved by the Dean or his/her designee. The Office of Continuing Medical Education (OCME) will operate under the following policy as it relates to the payment of honoraria for CME activities. This Policy is in effect irrespective of commercial support of a CME activity.

- a) Scope: All WFBMC employees, faculty and staff as well as any outside organization/group seeking joint sponsorship for its proposed CME activity are responsible for complying with this Policy.
- b) Responsible Department/Party/Parties:
 - i. Policy Owner: Dean, School of Medicine
 - ii. Procedure: OCME
 - iii. Supervision: Associate Dean, CME
 - iv. Implementation: OCME and CME Committee

2) Definitions: For purposes of this Policy, the following terms and definitions apply:

- a) WFBMC: Wake Forest Baptist Medical Center and all affiliated organizations including Wake Forest University Health Sciences (WFUHS)/WFSM, North Carolina Baptist Hospital (NCBH), all on-site subsidiaries as well as those off-site governed by WFBMC policies and procedures.
- b) Policy: As defined in the Policy on Creating and Amending Policy, a statement of principle that is developed for the purpose of guiding decisions and activities related to governance, administration or management of care, treatment, services or other activities of WFBMC. A policy may help to ensure compliance with applicable laws and regulations, promote one or more of the missions of WFBMC, contain guidelines for governance and set parameters within which faculty, staff, students, visitors and others are expected to operate.
- c) CME: The OCME uses the American Medical Association (AMA) House of Delegates'

definition of CME – “educational activities that 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 health care to the public.”

3) Policy Guidelines

- a) General Requirements:
 - i. Planners¹, teachers and authors of WFSM-sponsored or jointly-sponsored CME activities may be paid an honorarium for their participation. All honoraria will be reviewed, considered and approved by the WFSM CME Committee as part of the CME activity review and approval process. The institutional *Request for Payment/Special Services Form* must be executed by the OCME (or another WFBMC department/section as authorized by the OCME), and all forms listing a payment higher than \$1500 per day must be approved by the Dean or his/her designee.
 - ii. OCME staff will work with Activity Directors and the CME Committee to ensure honoraria are consistent with current market averages.
 - iii. Planners, teachers and authors of WFSM-sponsored CME activities may be reimbursed for out-of-pocket expenses consistent with WFBMC policies. Original receipts are required for reimbursement.
 - iv. If teachers or authors are listed on a CME activity agenda as facilitating or conducting a presentation or session, but participate in the remainder of the activity as learners, their expenses can be reimbursed and honoraria can be paid for their teacher and/or author roles.
 - v. No other payment, apart from those paid by WFBMC in adherence to this Policy, shall be given to planners, teachers, authors, joint sponsors or others involved with a CME activity.

¹Planners are defined as Activity Directors, additional planning committee members, their staff and any others involved in the planning and/or delivery of CME activities.

4) Review/Revision/Implementation

- a) Review Cycle: This Policy shall be reviewed by the CME Committee and the OCME at least every three years from the effective date or as changes in Accreditation Council for Continuing Medical Education (ACCME), AMA, and/or similar accrediting policies/requirements necessitate.
- b) Office of Record: After authorization, the OCME shall house this Policy in a policy database and shall be the office of record for this Policy.

5) Related Policies

- a) *WFBMC Request for Payment/Special Services Form and Instructions*
- b) *WFBMC Travel Authorization Form and Instructions*
- c) *WFBMC Travel Expense Voucher Form and Instructions*

6) Governing Law or Regulations

- a) *The Accreditation Requirements of the ACCME*
 - i. *Accreditation Criteria*
 - (a) Criterion 8
 - ii. *Standards for Commercial Support: Standards to Ensure Independence in CME Activities*
 - Standard 3: Appropriate Use of Commercial Support
 - (a) Standard 3.7
 - (b) Standard 3.8
 - (c) Standard 3.9
 - (d) Standard 3.10

- iii. *ACCME Policies and Definitions*
- b) *AMA Physician's Recognition Award and Credit System: Information for Accredited Providers and Physicians – 2010 Revision*
- c) *AMA Code of Medical Ethics*
 - i. 8.061 Gifts to Physicians for Industry
 - ii. 9.011 Continuing Medical Education

7) Attachments

- *The Accreditation Requirements of the ACCME*
- *AMA Physician's Recognition Award and Credit System: Information for Accredited Providers and Physicians – 2010 Revision*
- *AMA Code of Medical Ethics*
 - 8.061 Gifts to Physicians from Industry
 - 9.011 Continuing Medical Education