

## **POLICIES AND PROCEDURES**

### **I. ADMINISTRATION**

Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE) has served physicians, pharmacists, nurses, and other health care professionals at the school and in the Tufts-affiliated hospitals for over 30 years. The OCE certifies approximately 270 activities per year, including live conferences, Internet-based activities, journals, and Regularly Scheduled Series (RSS) for regional, national and international audiences. The OCE is fully accredited by the national physician, pharmacist, and nursing accrediting bodies: Accreditation Council for Continuing Medical Education (ACCME), Accreditation Council for Pharmacy Education (ACPE), and American Nurses Credentialing Center Commission on Accreditation (ANCC COA).

Tufts Health Care Institute (THCI), a not-for-profit educational organization, was established in 1995 as a collaborative venture of the Tufts University School of Medicine (TUSM) and Tufts Health Plan (THP), a leading health maintenance organization in Massachusetts. The core mission of THCI has been to help health care professionals at all stages of their training and development to practice effectively and lead change in a high-quality, cost-effective health care system. In 2005, at the request of Tufts School of Medicine, THCI assumed management and oversight responsibility for the continuing education and accreditation function for TUSM.

The shared mission of the OCE/THCI is to promote lifelong learning for health care professionals, with the ultimate goal of improving patient care and health outcomes. The OCE and THCI play a major role in developing innovative educational activities focused on performance improvement, quality of care, patient safety, and efficient use of resources. Target audiences for these educational initiatives are physicians at all levels of training and development, pharmacists, nurses, and other health care professionals as appropriate.

### **Mission Statement**

#### **A. Purpose**

The mission of Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE) is to enhance clinician knowledge and competence; improve clinician performance; and promote lifelong learning for Tufts-affiliated physicians, nurses, pharmacists, and for other health practitioners locally, regionally, nationally and internationally. The ultimate goal of this endeavor is to improve patient care and health outcomes.

We fulfill this mission through the development of educational activities that: address gaps in knowledge, quality or performance; disseminate evidence-based knowledge and skills; employ educational methods that are suitable to the content, topic, and target audience; and are free from commercial bias or influence.

We engage in systematic analysis of the value and impact of our educational activities and strive continuously to improve the quality and effectiveness of this work.

## **B. Content Areas**

TUSM's continuing education activities are designed to address one or more of the ABMS/ACGME General Competencies including Medical/Clinical Knowledge, Patient Care, Professionalism, Interpersonal and Communications Skills, Practice-Based Learning and Improvement, and Systems-Based Practice. In addition, in the Program as a whole, we aim to address the IOM core competencies including practicing patient-centered care, working in interdisciplinary teams, employing evidence-based practice, applying quality improvement techniques and utilizing informatics.

Drawing on the expertise of Tufts-affiliated faculty, as well as regional, national and internationally-recognized experts, educational content is derived from needs assessments from a range of sources. These include prior course evaluations, surveys of learners, specialty society guidelines, planning committees, literature reviews, and regulatory requirements, as well as hospital-based and publicly-reported quality and performance data.

OCE's educational approach for health care professionals responds to the realities of today's health care system, including the need to:

- Systematically assess and improve quality;
- Provide cost-effective, high quality care;
- Manage care using patient-centered approaches and strategies; and
- Coordinate and deliver care through organized systems and multidisciplinary teams.

## **C. Target Audiences**

OCE educational activities and teaching resources are developed for both Tufts-affiliated and non-Tufts physicians, nurses, pharmacists and other members of the health care team at the local, regional, national and international level. Depending on the identified practice gaps and educational needs, we will design our activities for inter-professional audiences.

## **D. Types of Activities**

The OCE employs multiple educational formats ranging from Regularly Scheduled Series at Tufts-affiliated teaching hospitals to live courses and webcasts, Internet point-of care CME, and enduring web-based, computer-based and print educational activities. Throughout our continuing education activities, OCE strives to engage learners through interactive teaching, case-based learning, reflective exercises, and self-assessments, as appropriate.

## **E. Expected Results**

The OCE's overall program and individual activities are designed to improve clinician knowledge, competence, performance and/or patient health status/metrics. We routinely evaluate the educational impact of each activity by asking participants at the conclusion of the activity to reflect on what they have learned and then answer questions regarding:

- Their intent to change their behavior;
- Expected barriers and obstacles to change; and
- How they might overcome these obstacles.

In addition, OCE uses other evaluation methodologies to assess activity impact, including follow-up surveys to assess self-reported changes in clinician behavior, hospital- or practice-based QI data and publicly reported metrics.

Activity data are synthesized annually to assess the OCE program's performance as a whole, and to identify and prioritize areas for improvement.

## **II. REQUIREMENTS FOR ALL EDUCATIONAL ACTIVITIES**

### **A. General Requirements**

- All CE activities must be reviewed by and planned in conjunction with the OCE.
- A TUSM OCE Educational Activity Planning Form must be utilized for each activity.
- A providership agreement, generated by TUSM OCE, must be signed by all educational partners, defining the responsibilities for activity planning, administration, documentation requirements and budget management prior to the activity.
- Needs assessment data from multiple sources must be used to plan and evaluate all educational activities. Assessment and review of the identified target audience's educational needs is a required step in the activity planning process. Learner needs determine the goals and objectives and content to be covered.
- Commercial interests may not be involved in activity planning, implementation, evaluation, or faculty selection.
- The overall activity goal, educational objectives and content will be determined by the TUSM OCE, the activity director and/or the activity advisory committee members and lead planners.
- As the accredited provider, TUSM OCE assumes responsibility for the content validity and integrity of an activity.
- The selection of faculty will be the responsibility of the OCE, in conjunction with the activity director and/or the activity advisory committee and lead planners. Faculty will be selected based on knowledge and expertise in the content area and professional qualifications. Faculty will contribute to the planning, presentation and/or evaluation of the activity as appropriate. At least one Tufts faculty member and/or planner must be represented on the advisory committee and/or in the activity.
- Based on adult learning principles and active learning methods, all course directors and faculty are encouraged to actively engage participants to the best of their ability in

conjunction with appropriate format and assess participant learning before, during and after the educational activity.

- All faculty, planning committee members, and other persons in a position to control the content of an activity must return a signed Disclosure Form to the OCE prior to the activity date. If it is determined that a conflict of interest exists, it will be addressed and resolved by the course director, the medical director and the nurse planner (when applicable and as appropriate), prior to the start of the activity. All information will be made available to participants prior to the start of an activity. If those in a position to control the content of an educational activity refuse to disclose relevant financial relationships, they will be disqualified from being a part of the planning and/or implementation of the activity.
- As the accredited provider, TUSM will determine the number of credits or contact hours awarded for the activity based on ACCME, ACPE, ANCC COA and other criteria, as applicable.
- Successful completion of an activity will be determined by TUSM OCE but will include:
  - Sign-in to an activity
  - Full or partial attendance (unless Planning Committee determines otherwise, generally there is no partial credit and we expect full attendance at our activities)
  - Completion of activity evaluation
  - For enduring activities: assessment tool such as a post-test
- All print/marketing materials (i.e., brochures, flyers, journal advertisements, syllabi, evaluation forms, etc.) and web-based materials will be developed with and reviewed by the OCE prior to printing.
- Print, marketing and web-based materials will include required accreditation language, provided by TUSM OCE. Information cannot be printed, launched, or distributed until TUSM OCE has reviewed and approved the information.
- All activities must be evaluated upon the completion of the activity and 8-10 weeks post-activity. The evaluation tool will be developed based on the criteria of the ACCME, ACPE, ANCC COA and others, as applicable. The evaluation tool for jointly provided activities will be developed collaboratively based on the same criteria.
- Attendance verification is required by an OCE staff person or designee responsible to the OCE as the accredited provider. Any travel costs incurred with this effort must be reimbursed.
- Verification of participation and/or certificate of successful completion for a continuing education activity must be signed by the director of TUSM OCE. CE certificates will be distributed on-site, mailed, emailed, or made available to participants online, through Tufts Online CE Tracker, after the required materials are submitted, i.e., completed evaluation, post-test, etc.
- Complete records are kept on file by the TUSM OCE for a minimum of six (6) years.
- Commercial support must be provided as an unrestricted educational grant and must be accompanied by a signed commercial support agreement. All commercial support must be acknowledged in the activity materials and made known to participants in advance of the educational activity.
- As the accredited provider, TUSM must have an estimated and final budget for the activity file.

- Any complaints and/or grievances by participants will be promptly addressed per TUSM policy.
- TUSM reserves the right to withdraw at any time prior to the start date of an activity if the policies and procedures are not followed.

## 1. Content Validation

Accredited providers are responsible for validating the clinical content of CE activities that they certify. Specifically, all the recommendations involving clinical medicine in a CE activity must be based on evidence that is accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients. In addition, all scientific research referred to, reported or used in CE in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection and analysis.

## 2. Commercial Support

Commercial Support is financial or in-kind contributions given by a commercial interest, which are used to pay all or part of the costs of a CE activity. TUSM OCE follows the ACCME's Standards for Commercial Support (SCS) found at: [www.accme.org/dir\\_docs/doc\\_upload/68b2902a-fb73-44d1-8725-80a1504e520c\\_uploaddocument.pdf](http://www.accme.org/dir_docs/doc_upload/68b2902a-fb73-44d1-8725-80a1504e520c_uploaddocument.pdf)

All commercial support associated with an educational activity must be given with the full knowledge and approval of TUSM OCE and documented in a written agreement between the commercial supporter, educational partner, and TUSM OCE. The Commercial Support Agreement must be signed by TUSM OCE and all parties.

Commercial interests shall not make support contingent on the acceptance of advice about speakers or educational matters, such as content, objectives or educational methods.

A commercial supporter may never disburse payments directly to faculty. Only TUSM OCE, the joint provider, or designated educational partner may disburse faculty honoraria or reimbursement for out-of-pocket expenses, as per written agreement with TUSM OCE. Funds from commercial supporters must be in the form of an unrestricted educational grant.

- (a) If payment is being sent to TUSM OCE, the grant should be made payable to "Trustees of Tufts College" and sent directly to TUSM OCE. Grants made directly to TUSM OCE are subject to a university Overhead & Maintenance surcharge when funds are received.
- (b) If appropriate, the grant can also be made payable to a department or division as an educational partner of TUSM. In this situation the following information must be included in the commercial support agreement:

Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE) designates [Name of educational partner] to receive \$\_\_\_\_\_ from the educational grant from [Name of Commercial Supporter].

Please see Page 20 for detailed information regarding ACCME's Standards for Commercial Support.

### 3. Exhibitors

#### *From the ACCME Standards for Commercial Support:*

**4.1** Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation; nor can they be a condition of the provision of commercial support for CE activities.

**4.2** Product-promotion material or product-specific advertisement of any type is prohibited in or during CE activities. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from CE.

- For **print**, advertisements and promotional materials will not be interleaved within the pages of the CE content. Advertisements and promotional materials may face the first or last pages of printed CE content as long as these materials are not related to the CE content they face **and** are not paid for by the commercial supporters of the CE activity.
- For **computer based**, advertisements and promotional materials will not be visible on the screen at the same time as the CE content and not interleaved between computer 'windows' or screens of the CE content.
- For **audio and video recording**, advertisements and promotional materials will not be included within the CE. There will be no 'commercial breaks.'
- For **live, face-to-face CE**, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CE activity. Providers will not allow representatives of Commercial Interests to engage in sales or promotional activities while in the space or place of the CE activity.

**4.3** Educational materials that are part of a CE activity, such as slides, abstracts and handouts, cannot contain any advertising, trade name or a product-group message.

**4.4** Print or electronic information distributed about the non-CE elements of a CE activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product promotion material or product-specific advertisement.

**4.5** A provider cannot use a commercial interest as the agent providing a CE activity to learners, e.g., distribution of self-study CE activities or arranging for electronic access to CE activities.

### 4. Conflict of Interest

In accordance with the policies of TUSM Office of Continuing Education (OCE), the Accreditation Council for Continuing Medical Education (ACCME), the American Medical Association (AMA), the American Nurses Credentialing Center's Commission on Accreditation (ANCCCOA), the Accreditation Council for Pharmacy Education (ACPE), and other applicable professional organizations, educational activities shall be balanced, objective, and based on scientific methods generally accepted in the medical community. Faculty shall reference the best available evidence (e.g., evidence-based medicine or best practices) and shall disclose limitations of the information and data, such as interim results, preliminary data or unsupported opinion. Educational activities shall provide meaningful opportunities for scientific debate or questioning during the

activity. We recommend that individuals visit <http://www.nfeinitiative.org> and participate in the free, online educational activity to become familiar with the responsibilities associated with involvement in certified educational activities. This activity explains the difference between certified CE activities and commercial marketing/promotional activities.

Speakers should typically use generic names in presentation content. If trade names are used, the speaker should cite the names of products by several manufacturers. Faculty shall disclose if a product is not labeled (unapproved by FDA) for the use under discussion or if a product is still investigational.

All faculty, course directors, planning committee members and others in a position to control the content of an educational activity are required to complete a Disclosure Form noting all relevant financial relationships (or lack thereof) with any commercial interest within the past 12 months. This disclosure information must be relayed to the audience prior to the start of an activity.

If it is determined that a conflict of interest exists as a result of a financial relationship, this will be resolved by course director, the medical director and the nurse planner (when applicable), prior to the start of the activity. If those in a position to control the content of an educational activity refuse to disclose relevant financial relationships, they will be disqualified from being a part of the planning and/or implementation of the activity.

The following are proposed methods for resolving conflicts and assuring that content is free of commercial bias:

- A review of the speaker's syllabus materials has been conducted to ensure that the presentation is fair and balanced, that it is evidence-based and that generic names are substituted for trade names.
- Other speakers' viewpoints are presented
- The audience has sufficient opportunity to ask questions at all presentations
- Focus of the activity will be away from the conflict of interest
- The conflicted faculty's presentation will be limited to a report without recommendations
- Another speaker will control that part of the content
- All planning committee members are involved in determining topics and speakers for the activity.

Commercial Interest- The ACCME defines a "commercial interest" as any proprietary entity producing health care goods or services, with the exemption of providers of direct clinical services (e.g., hospitals, group medical practices, nursing homes), non-profits, government organizations, health insurance companies, liability insurers and non-healthcare related companies.

Financial Relationships- Relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected. ACCME considers relationships of the person involved in the educational activity to include financial relationships of a spouse or partner.

Relevant Financial Relationships- ACCME focuses on financial relationships with commercial interests in the 12-month period preceding the time that the individual is being asked to assume a role controlling content of the educational activity. ACCME has not set a minimal dollar amount for relationships to be significant. Inherent in any amount is the incentive to maintain or increase the value of the relationship. The ACCME defines “‘relevant’ financial relationships” as financial relationships in any amount occurring within the past 12 months that create a conflict of interest.

Conflict of Interest- Circumstances create a conflict of interest when an individual has an opportunity to affect educational content about products or services of a commercial interest with which he/she has a financial relationship.

## **5. Accreditation Statements**

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

### **Joint Providership (ACCME):**

ACCME accredited providers that plan and present one or more activity with non-ACCME accredited providers are engaging in “joint providership.” A commercial interest, defined as any proprietary entity producing health care goods or services, with the exception of non-profit or government organizations and non-health care related companies, cannot take the role of non-accredited provider in a joint providership relationship. The ACCME expects all CE activities to be in compliance with the Essential Areas and Elements (including the Standards for Commercial Support) and Accreditation Policies. In cases of joint providership, it is the ACCME accredited provider’s responsibility to be able to demonstrate through written documentation this compliance to the ACCME. Materials submitted that demonstrate compliance may be from either the ACCME accredited provider’s files or those of the non-accredited provider. An agreement outlining the roles and responsibilities of the provider and the educational partner must be in place for all jointly provided activities.

### **Joint Providership (ANCC and ACPE):** (See below for information regarding ANCC and ACPE joint providerships)

There is no joint providership accreditation statement. If two or more accredited providers are working in collaboration on a CE activity, one provider must take responsibility for the compliance of that activity. [Note: for continuing pharmacy education activities, if two or more approved providers work together, the responsibility is held jointly. If an accredited provider works with others for development, distribution and/or presentation, the accredited provider is responsible for meeting all criteria.] CE activities should use the accredited provider activity statement, naming the one accredited provider that is responsible for the activity. An agreement outlining the roles and responsibilities of all providers must be in place for all jointly provided activities.

**Joint Providership (ANCC):**

Planning, developing and implementing an educational activity by two or more organizations or agencies. When educational activities are jointly provided and one of the providing entities is ANCC-accredited, the ANCC-accredited provider unit retains identified responsibilities:

- (a) determination of the educational objectives and content;
- (b) selection of the content specialist planners and activity presenters;
- (c) the awarding of contact hours, as appropriate, to the individual educational activity;
- (d) recordkeeping procedures
- (e) evaluation methods and categories; and
- (f) management of any commercial support or sponsorship

If collaborating providers are all ANCC-accredited, one is designated to retain the provider responsibilities by mutual, written agreement. The unit designated to retain these responsibilities is referred to as the provider, and the other collaborating providers are referred to as joint providers.

**Joint-Providership (ACPE):**

(Taken from ACPE's CPE Policies and Procedures Manual)

ACPE accredited providers that collaborate on content development with ACPE and/or non-ACPE accredited providers are engaging in joint providership. ACPE expects all CPE activities to be in compliance with the Accreditation Standards for Continuing Pharmacy Education.

**Procedures**

The provider (TUSM) should collaborate with the joint provider(s) in all stages of development of the activity, from planning, development, promotion, delivery, evaluation and review. Joint providership agreements should be developed to clearly define the working relationships between parties; include completion dates for various tasks; and recourses in the event that the parties involved fail to meet their responsibilities. Joint providership agreements should document the ACPE-accredited provider's responsibility to assure compliance with ACPE standards. (Non ACPE-accredited organizations cannot assume responsibility for compliance with ACPE standards; therefore, this responsibility must be explicit in the agreement.)

Commercial interests cannot be accredited providers and cannot be joint providers. To maintain CPE activities as independent from commercial interests, the following cannot be in the control of a commercial interest: (i) identification of CPE needs, (ii) determination of educational objectives, (iii) selection and presentation of content, (iv) selection of all persons and organizations that will be in a position to control the content of the CPE, (v) selection of educational methods, and (vi) evaluation of the activity.

**(a) Physician Statement**

(1) For Directly Provided Activities:

*Tufts University School of Medicine is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.*

(2) For Jointly Provided Activities:

*This activity has been planned and implemented in accordance with the Essential Areas and policies of the Accreditation Council for Continuing Medical Education through the joint providership of Tufts University School of Medicine (TUSM) and (name of non-accredited provider). TUSM is accredited by the ACCME to provide continuing medical education for physicians.*

**(b) Pharmacist Statement**

*Tufts University School of Medicine Office of Continuing Education is accredited by the Accreditation Council for Pharmacy Education as a Provider of continuing pharmacy education. (Note: The ACPE logo must be used in conjunction with this statement.)*

*This activity is available for [number of hours] contact hours.*

*Universal Activity Number \_\_\_ - \_\_\_ - \_\_\_ - \_\_\_ - \_\_\_*

*Type of continuing pharmacy education: (insert type; knowledge-based, practice-based or application-based)*

**(c) Nurse Statement**

*Tufts University School of Medicine Office of Continuing Education is accredited as a provider of continuing nursing education by the American Nurses Credentialing Center's Commission on Accreditation.*

*This activity provides [number of hours] contact hours for nurses.*

**6. Continuing Education Credit**

**(a) Physician**

TUSM OCE follows the ACCME guidelines for CE credit. CE credit is awarded based on the formula that 60 minutes of academic content is equal to 1 hour of continuing education credit. There is a minimum of 0.25 credits for every 15 minute increments. Participants are required to sign in and complete and submit an activity evaluation form in order to receive continuing education credit. CE verification certificates are distributed to participants either by mail or electronically after the conclusion of the activity. Sign in sheet(s)/attendance verification and the completed evaluations are cross-checked before CE certificates are distributed. Participants are notified prior to the beginning of an activity of the requirements for successful completion and how certificates will be awarded.

Designation of AMA PRA Category 1 Credits™: The following wording is mandated for use in approved promotional and course materials as a separate paragraph from the accreditation statement:

TUSM designates this (choose one: live activity, enduring material, journal-based CME activity, test-item writing activity, manuscript review activity, PI CME activity, Internet point-of-care activity) for a maximum of [insert #] *AMA PRA Category 1 Credits™*. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

**(b) Pharmacist**

TUSM OCE follows the ACPE guidelines for CE credit.

*Knowledge-based CPE activity* - The minimum credit for these activities is 15 minutes or 0.25 contact hour.

*Application-based CPE activity* - The minimum credit for these activities is 60 minutes or one contact hour.

*Practice-based CPE activity* - The minimum credit for these activities is 15 contact hours.

**Note: As of January 2012, all U.S. licensed pharmacists and pharmacy technicians wishing to obtain ACPE credit are required to have an NABP e-Profile ID to claim their credit(s). They must visit [www.MyCPEmonitor.net](http://www.MyCPEmonitor.net) to set up a profile.**

For international practicing pharmacists, TUSM OCE will issue a certificate directly.

**(c) Nurse**

TUSM OCE follows the ANCC guidelines for contact hours. A contact hour is defined as 60 minutes. Only educational sessions that are devoted to didactic or clinical experience, and the time spent on evaluation of the activity are awarded contact hours. Non-educational sessions such as breaks, lunches, and welcomes/introductions are not awarded contact hours. Hours are rounded down but never rounded up. The number of contact hours awarded for self study activities are calculated from pilot testing of the activity. See nursing statement above for contact hour language.

**7. Evaluation**

All TUSM OCE activities must be evaluated at the conclusion of the activity. A completed evaluation is required in order to receive credit/contact hours. The evaluation process assesses participant satisfaction including achievement of personal goals and objectives, faculty and session content, learning goal and objectives met, content of activity matched current scope of practice/educational needs, disclosure of financial relationships, communication of commercial support, intent to make changes in practice, anticipated barriers incorporating changes to current practice and how to overcome those barriers.

An evaluation summary is compiled for each CE activity. In cases of joint providership, the educational partner is responsible for compiling the evaluation summary and submitting it to TUSM OCE.

TUSM OCE tracks information regarding the number of participants and number of certificates issued. Evaluation of the activity obtains learner response to gained knowledge, competence and performance in terms of implementation and barriers to overcome in order to implement. All speakers are evaluated on content presented. Additionally, participants are welcome to comment on activity presentations in terms of how valuable content was and any suggested changes for future educational activities.

An outcomes measurement survey is sent to attendees 8-10 weeks post activity to assess if learners made changes in practice based on the learned knowledge competence and performance. Information in regards to the difficulties participants may be having in attempting to change practice is also obtained.

## **8. Record Retention**

Specific CE activity records must be maintained by the accredited provider. Record retention requirements relate to the following two topics: **Attendance Records** and **Activity Documentation**.

- (a) **Attendance Records:** An accredited provider must have mechanisms in place to record and, when authorized by the participating physician, verify participation for six years from the date of the CE activity. TUSM OCE requires that all participants sign-in at each educational activity.
- (b) **Activity Documentation:** TUSM OCE retains activity files/records of CE activity planning and presentation for a minimum of six years. Maintenance of this documentation enables the provider to, at the time of re-accreditation, show ACCME how the activities it provided during its current term of accreditation were compliant with all ACCME Essential Areas and Elements (including the Standards for Commercial Support) and Accreditation Policies.

## **B. Live Activity Procedures**

### **1. Responsibilities of the Course Director:**

- (a) Ensure that the activity is planned and executed in compliance with guidelines of the ACCME, ACPE, ANCC COA and other organizations, if applicable.
- (b) Planning, content and faculty
  - (1) Identify course topic, target audience, needs assessment, goal, educational objectives, appropriate faculty, date and location
  - (2) Make initial contact with potential faculty
  - (3) Support faculty with topic development
  - (4) Work with TUSM OCE to identify and resolve any conflict(s) of interest with faculty, planning committee members and others in a position to control the content of the activity
  - (5) Suggest means of promoting the activity (target audience(s) for mailings, journals for notices, etc.)
  - (6) Sign TUSM OCE provider agreement and meet regularly regarding planning of the activity

- (c) Comply with all requirements and time lines as noted on the TUSM OCE Checklist included in the Educational Activity Planning Form, located on line at:

<http://medicine.tufts.edu/Education/Continuing-Education/Educational-Activities>

## **2. OCE Administrative Services**

In addition to accreditation, the OCE provides full administrative services for educational activities. These services include event planning, fundraising, marketing, attendee registration and payment collection, coordination and support of faculty, course book development, program evaluation, and on-site logistics management.

## **C. Regularly Scheduled Series (RSSs)**

TUSM OCE certifies over 100 RSS at Tufts affiliated hospitals each year. TUSM OCE operates under the regulations of the Accreditation Council for Continuing Medical Education (ACCME) and defines a **Regularly Scheduled Series (RSS)** as an activity that is:

- Planned by TUSM-affiliated medical staff as a series with multiple sessions that occur on an ongoing basis (offered weekly, monthly, or quarterly)
- Primarily presented for the benefit of TUSM-affiliated physicians, fellows, residents and medical students. Generally open to any of the above described medical professionals from your facility whether within or outside your department—although there may be exceptions, for example, for peer review activities.
- Typically held on location at a TUSM affiliated facility

Examples of RSSs include recurring educational activities such as Grand Rounds, Morbidity and Mortality conferences, Journal Club, etc.

For each regularly scheduled series, forms must be submitted annually for CE approval. RSS forms are available online at: <http://medicine.tufts.edu/Education/Continuing-Education/RSS-for-TUSM-Affiliates>

Consultation and training on accreditation requirements, application completion and certificate generation is offered periodically throughout the year.

## **D. Self Study Procedures**

### **1. Enduring Materials**

TUSM OCE utilizes a combination of educational formats in addition to live educational activities. These include Internet, CD-ROM, monograph and other self study formats. TUSM OCE follows the ACCME guidelines regarding enduring materials which state that enduring materials must comply with all ACCME Essential Areas and Elements (including the Standards for Commercial Support) and Accreditation Policies. However, there are special communication requirements for enduring materials because of the nature of the activities. Because there is no direct interaction between the provider and/or faculty and the learner, the provider must communicate the following information to participants so that they are aware of this information prior to starting the educational activity:

1. Principal faculty and their credentials;
2. Medium or combination of media used;
3. Method of physician participation in the learning process;
4. Estimated time to complete the educational activity (same as number of designated credit hours/contact hours);
5. Dates of original release and most recent review or update; and
6. Termination date (date after which enduring material is no longer certified for credit);
7. Hardware/software requirements
8. Provider contact information (TUSM OCE)
9. Policy on Privacy and Confidentiality
10. Bibliographic sources

**Please contact TUSM OCE for full requirements related to enduring activities.**

Accredited providers may not enlist the assistance of commercial interests to provide or distribute enduring materials to learners.

TUSM OCE requires that learners complete a post-test and activity evaluation to verify learner participation and evaluate the activity.

Upon occasion, an enduring material will be created from a live CE activity. When this occurs, the ACCME considers the provider to have created two separate activities – one live activity and one enduring material activity. Both activities must comply with all ACCME requirements, and the enduring material activity must comply additionally with all ACCME policies that relate specifically to enduring materials.

## **2. Journal CE**

A journal-based CE activity includes the reading of an article (or adapted formats for special needs), a provider stipulated/learner directed phase (that may include reflection, discussion, or debate about the material contained in the article(s)) and a requirement for the completion by the learner of a pre-determined set of questions or tasks relating to the content of the material as part of the learning process.

TUSM OCE follows the ACCME guidelines regarding Journal CE which states that the educational content of Journal CE must be within the ACCME's Definition of CME. Journal CE activities must comply with all ACCME Essential Areas and Elements (including the Standards for Commercial Support) and Accreditation Policies. Because of the nature of the activity, there are two additional requirements that journal CE must meet: The ACCME does not consider a journal-based CE activity to have been completed until the learner documents participation in that activity to the provider. The learner should not encounter advertising within the pages of the article or within the pages of the related questions or evaluation materials.

TUSM OCE requires that learners complete a post-test and activity evaluation to verify learner participation and evaluate the activity.

### **3. Internet CE**

Live or enduring material activities that are provided via the Internet are considered to be “Internet CE.” TUSM OCE follows the ACCME guidelines regarding internet CE which state that internet CE must comply with all ACCME Essential Areas and Elements (including the Standards for Commercial Support) and Accreditation Policies. However, there are special requirements for Internet CE because of the nature of the activities:

*Activity Location:* ACCME accredited providers may not place their CE activities on a pharmaceutical or device manufacturers’ product website.

*Links to Product Websites:* With clear notification that the learner is leaving the educational website, links from the website of an ACCME accredited provider to pharmaceutical and device manufacturers’ product websites are permitted before or after the educational content of a CE activity, but shall not be embedded in the educational content of a CE activity.

*Advertising:* Advertising of any type is prohibited within the educational content of CE activities on the Internet including, but not limited to: banner ads, subliminal ads, and pop-up window ads. For computer based CE activities, advertisements and promotional materials may not be visible on the screen at the same time as the CE content and not interleaved between computer ‘windows’ or screens of the CE content.

*Hardware/Software Requirements:* The accredited provider must indicate, at the start of each Internet CE activity, the hardware and software required for the learner to participate.

*Provider Contact Information:* The accredited provider must have a mechanism in place for the learner to be able to contact the provider if there are questions about the Internet CE activity.

*Policy on Privacy and Confidentiality:* The accredited provider must have, adhere to, and inform the learner about its policy on privacy and confidentiality that relates to the CE activities it provides on the Internet.

*Copyright:* The accredited provider must be able to document that it owns the copyright for, or has received permissions for use of, or is otherwise permitted to use copyrighted materials within a CE activity on the Internet.

## **E. Requirements for Print Materials**

TUSM OCE must review and approval all materials prior to printing and distribution.

The following information must be included in educational activity promotional pieces (please see pharmacy/nursing specific information below):

- Prominently listed, appropriate providership statement
- TUSM logo
- Accreditation statement(s)
- Designation of *AMA PRA Category 1 Credits™*, contact hours, etc.
- Target audience
- Activity goal
- Educational objectives
- Competencies addressed
- Description of requirements for successful completion and obtaining, i.e., sign-in, complete and submit evaluation
- Statement of where and how credit/contact hours will be issued
- Schedule with speakers and start/end time noted – should address single or closely related subjects, allow adequate time for each topic area to be discussed, allow ample time and encourage active participation with Q&A sessions/feedback sessions
- Faculty with academic/clinical titles (including planning committee and speakers)
- Disclosure statement - “Disclosure information from faculty and all other persons in control of content will be provided to participants prior to the beginning of the educational activity. Individual faculty will disclose any discussion of off label or unapproved uses.”
- Commercial support and exhibitor statement – “A list of commercial supporters and exhibitors will be provided to participants in activity materials” or “There is no commercial support for this activity and exhibitors will not be present.)
- Registration fee(s) or “There is no fee for attending this activity”
- Refund/Cancellation policy
- ADA/OEO Nondiscrimination Policy statement
- Non-Endorsement statement
- Policy on Privacy and Confidentiality
- TUSM OCE contact information

See TUSM OCE website for Checklist of all requirements (included in the Educational Activity Planning Form:

<http://medicine.tufts.edu/Education/Continuing-Education/Educational-Activities>

The following information must be included in the syllabus/handout materials:

- Prominently listed, appropriate providership statement
- TUSM logo
- Accreditation statement(s)
- Designation of *AMA PRA Category 1 Credits™*, contact hours, etc.
- Target audience
- Activity goal
- Educational objectives
- Competencies addressed
- Description of requirements for successful completion and obtaining credit, i.e., sign-in, complete and submit evaluation

- Statement of where and how credit/contact hours will be issued
- Schedule with speakers and start/end time noted – should address single or closely related subjects, allow adequate time for each topic area to be discussed, allow ample time and encourage active participation with Q&A sessions/feedback sessions
- Faculty with academic/clinical titles (including planning committee and speakers)
- Disclosure/Conflict of Interest information
- List of Commercial supporters and exhibitors or “There is no commercial support for this activity and exhibitors will not be present.”
- ADA/OEO Nondiscrimination Policy statement
- Non-Endorsement statement
- Policy on Privacy and Confidentiality
- TUSM OCE contact information

See TUSM OCE website for Checklist of all requirements (included in the Educational Activity Planning Form:

<http://medicine.tufts.edu/Education/Continuing-Education/Educational-Activities>

Presentation materials submitted by the faculty will be reviewed by the activity director, CMO and/or the advisory committee and will be modified, if necessary, to assure appropriateness to the activity goal and educational objectives for the target audience. In addition, any potential conflicts of interest will be resolved prior to the start of the activity.

**F. Additional Requirements for Pharmacy Accreditation** (Please refer to Planning Form for additional pharmacy-related information.)

TUSM OCE implements and follows the most current *ACPE Continuing Pharmacy Education Provider Accreditation Program Policies and Procedures Manual: A Guide for ACPE-accredited Providers*.

- All pharmacy education activities must involve at least one or more pharmacists in planning and implementation.
- The activity must be structured to meet the knowledge-based, application-based and/or practice-based learning needs of pharmacists and/or pharmacy technicians. (See Planning Form for detailed information.)
- Objectives will be submitted per presentation/assigned Universal Activity Number (UAN).
- Objectives must be measurable and specific.
- The objectives must be appropriate for the activity-type selected (knowledge-based, application-based or practice-based) for what a pharmacist will be able to do at the completion of the activity. ([See Knowledge CPE Activity – Assessment Learning and Feedback Examples](#)).
- The objectives relate to content that is appropriate for a pharmacist or technician.
- The objectives are developed to specifically address the identified educational need.
- In general, the objectives are covered by a learning assessment (Standard 9).
- The provider, in collaboration with faculty, must include learning assessments in each CPE activity to allow pharmacists and technicians to assess their achievement of the learned content. Completion of a learning assessment is required for CPE credit.
- ACPE-specific language, logo and Universal Activity Number(s) (UANs) should be included with activity accreditation information/syllabus materials and relayed to learners

- Pharmacy participant evaluation results must be summarized separately from other disciplines.

### **G. Additional Requirements for Nursing Accreditation**

TUSM OCE's Lead Nurse Planner is accountable for the overall functioning of TUSM OCE's Provider Unit. The Lead Nurse Planner is responsible for training and orientation of all Nurse Planner's. If a Nurse Planner is not meeting performance expectations, the Lead Nurse Planner will guide and support him/her. If the Nurse Planner is not able to improve his/her performance, the Lead Nurse Planner will work with TUSM OCE key personnel to replace him/her.

For individual activities, a TUSM OCE assigned Nurse Planner must be involved in the entire process, from the planning through the evaluation and follow-up. Presenters must provide 2-3 educational objectives for each hour of presentation and an outline of their presentation. The activity evaluation must evaluate each presenter. A separate evaluation summary shall be prepared for nurse participants.

### **III. BUDGET AND FISCAL POLICY**

TUSM OCE adheres to both the University Policies and Procedures (see <http://finance.tufts.edu/policies-procedures/> ) and the ACCME Standards for Commercial Support (see [http://www.accme.org/dir\\_docs/doc\\_upload/68b2902a-fb73-44d1-8725-80a1504e520c\\_uploaddocument.pdf](http://www.accme.org/dir_docs/doc_upload/68b2902a-fb73-44d1-8725-80a1504e520c_uploaddocument.pdf) ) for the conduct of continuing education activities.

It is the TUSM OCE's expectation that continuing education activities will promote improvements of quality in health care (and not any proprietary business interests) and are structured to be self-supporting. Continuing education activities may be supported through a variety of mechanisms including:

- Departmental or institutional budgets (as is the case with the majority of RSS and activities conducted with TUSM-affiliated hospitals, departments, or centers);
- Registration fees;
- Exhibitor fees (when appropriate) and
- Educational grants from corporations, government agencies, and private and public foundations.

As the accredited provider, TUSM OCE is responsible for ensuring that following decisions are made free from control of commercial interests:

- Identification of CE needs
- Determination of educational objectives
- Selection and presentation of content
- Selection of all persons and organizations with control of the CME content
- Selection of educational methods
- Evaluation of the activity

While TUSM OCE both directly manages and works with educational collaborators/joint providers to conduct continuing education activities, the OCE always has responsibility for decisions regarding commercial support for CE activities, and requires activity budgets with final reconciliations for all activities. When CE activities are jointly provided by TUSM OCE, it is expected that each entity will operate in compliance with the OCE's policies and procedures and

the ACCME Standards for Commercial Support. Lack of compliance constitutes grounds for discontinuation of certification of an activity or initiative.

### **Honoraria**

Honoraria may only be paid by TUSM OCE or a designated educational partner, but not by a commercial interest. Faculty honoraria amounts are determined based on a number of factors and paid in compliance with Tufts University's consultant policies. The OCE, in conjunction with course directors, determines honoraria payments depending on activity and presentation length, number of sessions and format(s); number and type of deliverables associated with the activity; whether a program is local, national or international, and time away from work/patient care and market/specialty-specific rates for expert faculty. Honoraria payments cover the faculty's role as a teacher or author, and reimbursement will not be provided for any role related to their participation as a learner, nor may faculty accept any other payments for the activity. TUSM OCE does not provide honoraria or pay expenses to learners or other non-faculty/ non-author participants. Commercial supporters may not advise or suggest faculty, content, or other educational matters regarding the development and provision of a CE activity, nor may they propose honoraria amounts.

Because course directors or chairs assume additional responsibilities for an activity, fees for this role may be greater than those for faculty presenters. Faculty confirmation letters and materials convey this information in writing along with speaker reimbursement forms and instructions, as well as other necessary payment processing paperwork including W-9s, etc.

### **Travel Reimbursement**

The OCE follows the university's policy for faculty and staff travel reimbursement. Faculty are reimbursed for round trip air travel at coach class for domestic travelers and, with approval, advanced purchase business class for international travelers by the most direct route from the traveler's normal place of business to the educational activity.

### **Budget Management and OCE Fees**

As the accredited provider, TUSM OCE is responsible for maintaining accurate documentation for all CE activities, including those with commercial support. A commercial supporter may never disburse payments directly to faculty. Only TUSM OCE, the joint provider, or designated educational collaborator may disburse faculty honoraria or reimbursement for out-of-pocket expenses, as per written agreement with TUSM OCE. Funds from commercial supporters must be in the form of an educational grant.

(a) Generally speaking, grants are made payable to "Trustees of Tufts College" and sent directly to TUSM. These grants are subject to a University O&M surcharge.

(b) In some cases, the grant may be made payable to a joint provider, or department or division. In this situation the following information must be included in the commercial support agreement:

Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE) designates [Name of educational partner] to receive \$\_\_\_\_\_ from the educational grant from [Name of Commercial Supporter].

If CE activity budgets are directly managed by TUSM OCE, Department ID's will be requested and set up through the University for the activity, and all income (registration fees, grants, etc.)

and expenses will be allocated to either a designated account or general account for smaller programs. Activity budgets are developed, reviewed and/or maintained by OCE staff, and all efforts will be made to ensure that activity expenses are tightly monitored and managed. Requests for faculty honoraria and travel reimbursements from activity faculty or planners must include original receipts or documentation. Invoices will be paid upon receipt, once approved by OCE staff.

For jointly provided activities, TUSM OCE designates the joint provider, or department or division to receive the grant. TUSM OCE works with the joint provider to ensure that the Standards for Commercial Support are followed. A final activity budget is submitted to TUSM OCE for review by our budget manager who is responsible for ensuring that the commercial support was handled appropriately.

Fees for OCE services may include course accreditation/certification, conference/logistics planning and management, course consultation for planning, instructional development, or evaluation, technology development, and certificates (based on number of participants). OCE administrative services and TUSM overhead charges are listed as Indirect Expenses on OCE managed budgets. Additional fees may apply as agreed upon and stipulated with a sponsorship or commercial support agreement.

### **Compliance with ACCME Standards for Commercial Support**

The OCE has developed the following procedures to assure compliance with the ACCME Standards for Commercial Support (SCS):

For all activities that apply for and/or receive commercial support:

- Estimated budgets must be submitted for review to the OCE prior to application.
- The OCE must have full knowledge and approval of any commercial support for an educational activity in advance.
- Commercial interests may not be involved in activity planning, implementation, evaluation, or faculty selection.
- Commercial support agreements must be signed by the commercial supporter and the accredited provider [TUSM OCE] even if OCE designates the funds to go directly to the joint-provider. The agreement must specify the source of commercial support and document the terms of support and agreement to comply with the ACCME's SCS and others as noted. Completed copies of the signed agreement along with a projected/final budget will be kept on file in the OCE.
- Joint-provider agreements must outline the roles and responsibilities of each party. As the accredited provider, the OCE is responsible for adherence to all ACCME, ANCC, ACPE and other accreditation standards and requirements, and will work in concert with our educational collaborators to meet these rigorous standards.

Regardless of whether or not there is commercial support for an activity:

- CME content must be valid, evidence-based, fair balanced and independently planned, and free from commercial bias.
- All marketing/promotional materials must be submitted to OCE staff for approval prior to Distribution/launch to ensure that materials communicate appropriate accreditation requirements and are independent of commercial influence.
- Presenter materials as well as final syllabi or course materials are also submitted to OCE staff for final approval.
- All individuals who may be in a position to control the content of an activity must submit signed and dated disclosure forms in advance of the activity. Any individual who refuses

to disclose relevant financial relationships to OCE will be disqualified from participating in the activity.

- If it is determined that a conflict of interest (COI) exists, OCE staff will address and resolve this COI using a combination of approaches that may involve some combination of the following individuals: OCE staff, OCE medical director, the course director/chair, and course faculty prior to the start of the activity.
- Disclosure of financial relationships and disclosure of commercial support to the learners must occur prior to the beginning of any activity, with verification that this occurred.
- Social events or meals may not compete with or take precedence over the educational activity.
- Arrangements for commercial exhibits or advertisements cannot influence planning, presentation or be a condition of support for the activity. Exhibits must be kept separate from all CE activities.
- Educational materials cannot contain any advertising, trade name or product group messages. A commercial interest may not serve as the vehicle to provide a CE activity to learners (e.g., distributing self-study materials or arranging electronic access).

#### **IV. PRIVACY AND CONFIDENTIALITY POLICY**

##### **Participation in Educational Activities**

For live, certified activities, participant lists and contact information may be available in the course materials. This information is provided so that participants may communicate with one another during and after the activity. The Office of Continuing Education (OCE) will never sell participant lists to outside parties. In rare instances when the OCE wishes to share participant information with a 3rd party, OCE will only do so if participants grant explicit permission to have the contact information shared.

Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE) is managed by Tufts Health Care Institute (THCI) and follows the internet privacy and confidentiality policy of THCI. See full policy below:

##### **Internet Privacy**

Tufts Health Care Institute (THCI) is committed to helping physicians and other healthcare professionals practice comfortably and effectively in a high quality, cost-effective health care environment. We work to ensure that internet privacy of our users is protected. The following is our policy regarding user internet privacy.

##### **Collection of Personal Information**

All of the personal information that is collected during the registration process is kept in a secured area and is password protected. Your information will be kept on file for an indefinite period of time unless you notify THCI that you would like your information deleted. To delete your information, you must send an e-mail to THCI at [thci@thci.org](mailto:thci@thci.org), requesting that all personal information be removed. We will delete your personal information from our databases within several business days of receipt of your request; however, it will take approximately 6 weeks to ensure that all personal information is deleted from archival media used to ensure the integrity of our databases.

##### **E-Mail Messages**

Tufts Health Care Institute may send you periodic messages regarding system, activity and product announcements. You will receive messages in this regard unless you register to limit or decline these services as discussed below.

### **Limitation on use of Collected Information**

Tufts Health Care Institute will not sell or exchange users' personal information and registered e-mail addresses to any other party or organization without the explicit prior permission of the user. Collected information will not be shared with other 3rd parties unless THCI specifically identifies otherwise at the time the information is collected.

### **Update/delete/deactivate E-Mail Services**

Users may request changes to e-mail services delivered by Tufts Health Care Institute, including requests to receive no e-mail services. Users can send a request to have their email service eliminated by contacting Tufts Health Care Institute support at [thci@thci.org](mailto:thci@thci.org). However, once the E-Mail address is deleted, the user loses access to valuable information assets delivered via E-mail.

### **Cookies**

A "cookie" is a small text file that a website can send to your computer's hard drive while you are viewing the site. THCI uses cookies to verify your identity while using our service and to give you faster access to pages on our site so that you do not have to log in to every page you visit. We DO NOT use cookies to collect any personal information about you or from your computer. The cookie and all the information it contains is erased every time you end your session at THCI's website, unless we obtain your prior consent to do otherwise. You may set your browser not to accept cookies, but that will limit your use of many features on our site.

### **Log Files**

Tufts Health Care Institute records certain non-personal information in our web logs, such as: Internet Protocol address, browser type (e.g., whether you use Netscape or Internet Explorer), the page requested and the time of each page request. We collect this non-personal information to: track times to manage resources, analyze trends to provide better service, and for other site administration. This demographic information is not connected to any personally identifiable information, such as a name or address, and will be used only to provide better, more targeted services. This information, if shared, will be shared only in aggregate form, with only select 3rd parties, unless THCI specifically identifies otherwise at the time the information is collected. Tufts Health Care Institute will never release any user's personally identifiable information to 3rd parties unless subpoenaed or ordered by court of law, or to protect the security and safety of our visitors and our web site.

### **Security**

Access to computer data and files at Tufts Health Care Institute is secured by password coding and internal file security. THCI uses reasonable efforts to ensure that all personal information is protected from Internet access in a secured area and can only be accessed by authorized Tufts Health Care Institute employees. Users should be aware that e-mail is not necessarily secure against interception and that any information considered sensitive by the user should be delivered to THCI by postal mail or telephone.

### **Changes to this policy and Use of the Web Site**

Although Tufts Health Care Institute does not intend to change its privacy-confidentiality policy, THCI reserves the right to do so at any time. THCI will inform users of the THCI Web Site of any change in THCI's privacy policy by posting the changed policy on our website. You should check the THCI site periodically to view our current privacy policy. By using THCI's website, you agree to the provisions of our privacy policy and to the collection and use of information as described in this policy.

### **Unsolicited E-mail as a Result of Participation in a Member Community**

At Tufts Health Care Institute, we recognize that the value of open, discussion-based member communities is in the free exchange of information and communication on a given subject, and that preventing unsolicited e-mails is vital to the health and value of these communities. Tufts Health Care Institute is committed to preventing abuse of the Member communities to the full extent of our abilities within reason. If you are the victim of unsolicited e-mail advertising on a Tufts Health Care Institute list, or one claiming to be sent from Tufts Health Care Institute, please forward it to [thci@thci.org](mailto:thci@thci.org). We will make every reasonable effort to stop unsolicited advertising to our members.

### **Contact Us**

If you have any questions regarding THCI's Privacy – Confidentiality Policy please contact THCI:

Phone: 617-636-1000

Email: [thci@thci.org](mailto:thci@thci.org)

Mail: 136 Harrison Avenue, Boston, MA 02111

## **V. ADA/OEO NONDISCRIMINATION POLICY**

Tufts University School of Medicine (TUSM) considers all applicants and activity participants without regard to race, color, national origin, age, religious creed, sex or sexual orientation. TUSM is an Equal Opportunity Employer. TUSM does not discriminate on the basis of a disability in admissions, access to treatment, or employment in their programs and activities as identified in the American with Disabilities Act.

## **VI. NAME USE POLICY**

TUSM OCE follows the University's Name Use Policy. See full policy at: <http://legal.tufts.edu/?pid=12>

## **VII. BUSINESS CONDUCT POLICY**

TUSM OCE follows the University's Business Conduct Policy. See full policy at: <http://finance.tufts.edu/business-conduct-policy/>

## **VIII. INTELLECTUAL PROPERTY POLICY**

TUSM OCE follows the University's Intellectual Property Policy. See full policy at: <http://viceprovost.tufts.edu/?pid=6&c=6>

## **IX. GRIEVANCE POLICY**

Grievances or complaints may be submitted online via email at [med-oce@tufts.edu](mailto:med-oce@tufts.edu) or in writing to: Office of Continuing Education, Tufts University School of Medicine, 136 Harrison Ave., Boston, MA 02111, Fax # 617-636-0314.

All complaints/grievances will be brought to the attention of the Director of the Office of Continuing Education (see Grievance Policy and Form at <http://medicine.tufts.edu/Education/Continuing-Education/Grievance-Policy>). The Director will review, investigate, forward and/or respond to complaints and will put forth a best effort to adjudicate the issue(s), in conjunction with any staff.

All issues will be reviewed and responded to by the Director of the Office of Continuing Education. Issues regarding activity content will also be reviewed and addressed by the Course Director. A response will be forwarded by the Director of the Office of Continuing Education.

All complaints/grievances will be reviewed by TUSM OCE Continuing Education Advisory Committee comprised. A written decision will be issued in a timely manner.

### Appeal Process:

Those persons who wish to appeal a decision/response should address the appeal in writing to the Director of the Office of Continuing Education within 15 working days of receipt of the decision/response. The Director will bring the appeal to the Appeals Committee. The Appeals Committee membership does not overlap with the TUSM OCE Continuing Education Advisory Committee and is comprised of the Dean of the Medical School, THCI board members (at least two) and the consulting Medical Director. The results of this appeal will be sent to the participant, no later than 10 working days after the meeting of the committee.

## **X. RESOURCES**

### Websites

Accreditation Council for Continuing Education (ACCME): [www.accme.org](http://www.accme.org)

American Nurses Credentialing Center (ANCC): <http://www.nursecredentialing.org>

Accreditation Council for Pharmacy Education (ACPE): [www.acpe-accredit.org](http://www.acpe-accredit.org)

American Academy of Family Physicians (AAFP): [www.aafp.org](http://www.aafp.org)

American Medical Association (AMA): [www.ama-assn.org](http://www.ama-assn.org)

Standards for Commercial Support: [www.accme.org/dir\\_docs/doc\\_upload/68b2902a-fb73-44d1-8725-80a1504e520c\\_uploaddocument.pdf](http://www.accme.org/dir_docs/doc_upload/68b2902a-fb73-44d1-8725-80a1504e520c_uploaddocument.pdf)

Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE):  
<http://medicine.tufts.edu/Education/Continuing-Education>

The National Faculty Education Initiative (NFEI): <http://www.nfeinitiative.org/>