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 35 years. The OCE provides approximately 250 activities per year, including live conferences, Internet-based activities, journals, and Regularly Scheduled Series (RSS) for regional, national and international audiences. The OCE is accredited by the national physician, nursing, and pharmacy accrediting bodies: Accreditation Council for Continuing Medical Education (ACCME), American Nurses Credentialing Center Commission on Accreditation (ANCC COA), and Accreditation Council for Pharmacy Education (ACPE).

MISSION STATEMENT

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.

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 addresses needs assessments and practice gaps derived 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-and practice-based and publicly reported quality and performance data.

TUSM 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.
**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 and performance gaps and educational needs, we will design our activities for inter-professional audiences.

**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.

**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.

**Continuing Pharmacy Education Goal**

- To provide educational activities to pharmacists as part of their life-long, professional learning;
- To maintain the TUSM OCE focus on inter-professional continuing education;
- To offer educational activities that are Knowledge, Application, and/or Practice-based, through multiple activity formats;
- To provide educational activities for pharmacists that are planned and implemented in accordance to ACPE standards for education and meet licensure requirements.

**REQUIREMENTS FOR ALL EDUCATIONAL ACTIVITIES**

**General Requirements**

- All CE activities must be reviewed by and planned in conjunction with the OCE.
- A TUSM OCE Continuing Education Activity Planning Form must be utilized for each activity.
- A TUSM OCE Provider and Joint Provider Collaboration Agreement, included in the TUSM OCE Continuing Education Planning Form, defining the responsibilities for activity planning, administration, documentation requirements, and budget management, must be signed by all joint providers/educational partners prior to the activity.
- Needs assessment should be conducted and reviewed by TUSM OCE to validate identified practice gaps and plan all continuing education activities. This is a required step in the activity planning process as the learner needs determine the activity goal(s), learner objectives/outcomes, desired results, competencies addressed, and content to be delivered.
• An ACCME-defined commercial interest-- any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients-- may not be involved in activity planning, implementation, evaluation, or faculty selection.

• The overall activity goal(s), learner objectives/outcomes, competencies addressed, and content will be determined by the TUSM OCE, the course director(s), 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 course director(s) and/or the activity planning 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 must be represented on the planning or review committee of the activity.

• The activity must be based on adult learning principles and active learning methods. 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 activity.

• All faculty, planning committee members, and other persons in a position to control the content of an activity must complete, sign, and return a signed TUSM OCE Disclosure Form prior to the activity date. If it is determined that a conflict of interest exists, it will be addressed and resolved by TUSM OCE staff, the course director, the medical director and the nurse planner (when applicable and as appropriate), prior to the start of the activity. TUSM OCE does not allow employees of an ACCME-defined commercial interest to be involved in planning of an activity. If this is reported on a disclosure form, that individual will be removed/replaced. All disclosure information (presence of relevant financial relationships with an ACCME-defined commercial interest or lack thereof) 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 and/or contact hours awarded for the activity based on ACCME, ANCC COA, ACPE and other criteria, as applicable.

Successful completion of an activity is determined by TUSM OCE and includes:

• Signing-in/registering to an activity
• Confirming number of participation hours (full or partial attendance)
• Completing the required activity evaluation
• For enduring activities: completing the learning assessment tool such as a post-test

• All print/marketing materials (i.e., brochures, flyers, journal advertisements, press releases, syllabi, evaluation forms, etc.) and web-based materials will be developed with and reviewed and approved by the OCE prior to printing/launch/distribution.

• 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 immediately upon completion of the activity and 8-10 weeks post-activity. The evaluation tool will be developed based on the criteria of the ACCME, ANCC COA, ACPE, and others, as applicable.

• Attendance verification for learners is required by an OCE staff person or designee identified by the OCE. Any travel costs incurred with this effort will be included with TUSM OCE accreditation/services fees.

• Official verification of participation and/or certificate of successful completion for a continuing education activity will be signed by the director of TUSM OCE. CE certificates will be mailed, emailed, or made available to participants online, after the required materials are submitted, i.e., completed evaluation, post-test, etc.
• Commercial support must be provided as an educational grant and/or in-kind support, and must be accompanied by a signed commercial support agreement. All commercial support and the nature of the 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 OCE must have an estimated and final budget for each activity.

• Complete records are kept on file by the TUSM OCE for a minimum of six (6) years.

• Any complaints and/or grievances by participants will be promptly addressed per TUSM OCE’s policy.

• TUSM OCE reserves the right to withdraw credit/contact hours at any time if the policies and procedures are not followed.

Content Guidelines & Policies

TUSM OCE follows the guidelines/policies of the AMA and ACCME regarding CME content.

AMA:

The content of all activities certified for AMA PRA Category 1 Credit™ must meet the AMA’s definition of CME, be non-promotional and be appropriate in depth and scope for the intended physician audience. The AMA’s definition of CME is:

Accredited CME providers may certify nonclinical subjects (e.g. office management, patient-physician communications, faculty development) for AMA PRA Category 1 Credit™ as long as these are appropriate to a physician audience and benefit the profession, patient care or public health. CME activities may describe or explain complementary and alternative health care practices. As with any CME activity, these need to include discussion of the existing level of scientific evidence that supports the practices. However, education that advocates specific alternative therapies or teaches how to perform associated procedures, without scientific evidence or general acceptance among the profession that supports their efficacy and safety, cannot be certified for AMA PRA Category 1 Credit™.

ACCME:

TUSM OCE follows the ACCME’s CME Clinical Content Validation Policy and definition of CME:

Accredited providers are responsible for validating the clinical content of CME activities that they provide. Specifically, all the recommendations involving clinical medicine in a CME 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.

All scientific research referred to, reported, or used in CME in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection, and analysis.

Providers are not eligible for ACCME accreditation or reaccreditation if they present activities that promote recommendations, treatment, or manners of practicing medicine that are not within the definition of CME, or known to have risks or dangers that outweigh the benefits or known to be ineffective in the treatment of patients. An organization whose program of CME is devoted to advocacy of unscientific modalities of diagnosis or therapy is not eligible to apply for ACCME accreditation.

Definition of CME: Continuing medical education consists of educational activities which 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 that 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.
TUSM OCE’s Content Review Policy:

TUSM OCE follows content validation guidelines of the AMA, ACCME, ANCC, and ACPE. TUSM OCE conducts a rigorous process to ensure that the content of activities is appropriate for CE. Content reviews can be conducted by all or any of the following individuals: course director/planners, TUSM OCE staff, TUSM OCE’s medical director and/or content expert/designated reviewer, and nurse planner (when applicable). The reviewer is chosen depending upon several factors, including if the content is clinical, if there is commercial support, and if relevant financial relationships with ACCME-defined commercial interests exist. The reviewer completes our Content Review & Resolution of Conflict of Interest (RCOI) form upon completion of their review. This form includes information on whether: the content is fair, balanced, and free of commercial bias; patient treatment recommendations are evidence-based and contribute to overall improvements in patient care; scientific studies cited in the content conform to standards accepted by the scientific community; content gives a balanced view of therapeutic options; no commercial interest logos are included; and generic drug names are used in place of trade names. This form is required to be completed prior to each activity. If it is determined that a potential conflict of interest exists because of a relevant financial relationship, this conflict must be resolved prior to the beginning of the activity.

Additional Review

The TUSM OCE participant evaluation form acts as an additional tool to determine whether or not the audience perceived any commercial bias in an activity. The results are reviewed internally, and if more than 10% of all participants report that they felt a presentation was not free of commercial bias, we will reeducate the Course Director/speaker on commercial bias. If this occurs again with the same speaker, we reserve the right to bar this individual from speaking at future TUSM OCE activities. This is documented on our Speaker Bias Form.

Commercial Support

Commercial Support is financial or in-kind contributions given by an ACCME-defined 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). When a commercial interest provides financial or in-kind support for an educational activity they are referred to as a commercial supporter of the activity. The two types of support are defined below:

- Financial Support: A monetary donation in the form of an educational grant
- “In-kind” Support: Non-monetary resource(s) (the loan or donation of equipment, supplies, and/or services) provided by a commercial interest in support of the educational activity

All commercial support (financial or in-kind) associated with an educational activity must be given with the full knowledge and approval of TUSM OCE and documented in a written agreement between TUSM OCE and the commercial supporter (and joint provider/educational partner, if applicable).

ACCME-defined commercial interests shall not make support contingent on the acceptance of advice about speakers or educational matters, such as content, learner objectives/outcomes or educational methods. Grant applications/requests for commercial support cannot include any exhibit opportunities. Arrangements for commercial exhibits cannot be a condition of the provision of commercial support for CE activities. Requests for exhibits and exhibit payments must be separate.

A commercial supporter may never disburse payments directly to faculty. Only TUSM OCE or the educational partner/joint provider if designated by (TUSM OCE) 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. Please see the Disbursement of Commercial Support, Budget Management, and OCE Fees section of the BUDGET AND FISCAL POLICY on page 14.

For further information on ACCME’s Standards for Commercial Support, please visit this link to their website.
Exhibitors

Commercial exhibits and advertisements are promotional activities and not continuing education. Therefore, funds paid by commercial interests for promotional activities are not considered to be commercial support. Requests for exhibits and exhibit payments must be separate from commercial support/educational grants approved/received. Commercial interests may not exhibit, promote or sell products or services during the introduction of an educational activity or any time while the educational activity takes place, regardless of the format of the educational activity.

Appropriate Management of Associated Commercial Promotion

From the ACCME Standards for Commercial Support:

STANDARD 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 CME activities.

STANDARD 4.2 Product-promotion material or product-specific advertisement of any type is prohibited in or during CME 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 CME. For print, advertisements and promotional materials will not be interleaved within the pages of the CME content. Advertisements and promotional materials may face the first or last pages of printed CME content as long as these materials are not related to the CME content they face and are not paid for by the commercial supporters of the CME activity. For computer based, advertisements and promotional materials will not be visible on the screen at the same time as the CME content and not interleaved between computer ‘windows’ or screens of the CME content. Also, ACCME-accredited providers may not place their CME activities on a Web site owned or controlled by a commercial interest. With clear notification that the learner is leaving the educational Web site, links from the Web site of an ACCME accredited provider to pharmaceutical and device manufacturers’ product Web sites are permitted before or after the educational content of a CME activity, but shall not be embedded in the educational content of a CME activity. Advertising of any type is prohibited within the educational content of CME activities on the Internet including, but not limited to, banner ads, subliminal ads, and pop-up window ads. For computer based CME activities, advertisements and promotional materials may not be visible on the screen at the same time as the CME content and not interleaved between computer windows or screens of the CME content. For audio and video recording, advertisements and promotional materials will not be included within the CME. There will be no ‘commercial breaks.’ For live, face-to-face CME, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CME activity. Providers cannot allow representatives of Commercial Interests to engage in sales or promotional activities while in the space or place of the CME activity. For Journal-based CME, None of the elements of journal-based CME can contain any advertising or product group messages of commercial interests. The learner must not encounter advertising within the pages of the article or within the pages of the related questions or evaluation materials.

STANDARD 4.3 Educational materials that are part of a CME activity, such as slides, abstracts and handouts, cannot contain any advertising, corporate logo, trade name or a product-group message of an ACCME-defined commercial interest.

STANDARD 4.4 Print or electronic information distributed about the non-CME elements of a CME 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. STANDARD 4.5 A provider cannot use a commercial interest as the agent providing a CME activity to learners, e.g., distribution of self-study CME activities or arranging for electronic access to CME activities.

Conflict of Interest

In accordance with the policies of TUSM Office of Continuing Education (OCE), the Accreditation Council for Continuing Medical Education (ACCMCE), the American Medical Association (AMA), the American Nurses Credentialing Center's Commission on Accreditation (ANCC COA), 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](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.

All faculty, course directors, planning committee members, and others in a position to control the content of an educational activity are required to complete TUSM OCE’s Disclosure Form noting all relevant financial relationships (or lack thereof) that they or their spouse has/had with any ACCME-defined commercial interest within the past 12 months. This disclosure information must be relayed to learners prior to the start of an activity.

If it is determined that a conflict of interest exists as a result of a relevant financial relationship with an ACCME-defined commercial interest, this will be resolved by TUSM OCE, the course director, our medical director and our nurse planner (if 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 with an ACCME-defined commercial interest, 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 of interest and assuring that content is free of commercial bias:

- A review of the content has been conducted to ensure that the presentation is fair balanced, that it is evidence-based and that generic names are substituted for trade names. Additionally, participant feedback to evaluate for commercial bias in the activity will be reviewed post-activity. (Note: this is required for all content, not just content with potentially conflicted speakers.)
- Focus of the activity will be away from the conflict of interest
- Conflict of interest is not relevant to the activity content presented
- Credits/Contact hours will not be awarded for a portion or all of the educational activity
- Alternate faculty member will be assigned

Resolution options for employees (self or spouse) of a commercial interest (if applicable):

- The content is not related to the business lines or products of their employer.
- The content is limited to basic science research (e.g., pre-clinical research, drug discovery) or the processes/methodologies of research, themselves unrelated to a specific disease or compound/drug. Content is not related to clinical applications of the research/discovery or clinical recommendations concerning the business lines or products of their employer.

**ACCME Definition of a Commercial Interest**

The ACCME defines a “commercial interest“ 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 - unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.

An entity that advocates for use of the products or services of commercial interest organizations is considered to be a commercial interest.

Exceptions are made for nonprofit or government organizations and non-health care-related companies.

TUSM OCE follows ACCME’s guidelines noted below:

**Financial Relationships**

Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria for promotional speakers’ bureau, 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 CE 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. The ACCME has not set a minimal dollar amount for relationships to be relevant. 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. With respect to personal financial relationships, contracted research includes research funding where an institution receives a grant and manages the funds and the individual is the principal or named investigator on the grant.

**Conflict of Interest**

Circumstances create a conflict of interest when an individual has an opportunity to affect CE content about products or services of a commercial interest with which he/she has a financial relationship. The ACCME considers financial relationships to create actual conflicts of interest in CME when individuals have both a financial relationship with a commercial interest and the opportunity to affect the content of CME about the products or services of that commercial interest. The ACCME considers “content of CME about the products or services of that commercial interest” to include content about specific agents/devices, but not necessarily about the class of agents/devices, and not necessarily content about the whole disease class in which those agents/devices are used.

**Joint Providership (ACCME):**

ACCME accredited providers that plan and implement CE activities with non-ACCME accredited organizations are engaging in “joint providership.” ACCME-defined commercial interests cannot engage in joint providership of accredited CME activities. The ACCME expects all CME activities to be in compliance with the ACCME Criteria, the Standards for Commercial Support, and policies (accreditation requirements). In cases of joint providership, it is the ACCME-accredited provider’s responsibility to be able to demonstrate this compliance to the ACCME. An agreement outlining the roles and responsibilities of the provider and the joint provider/educational partner must be in place for all jointly provided activities.

**Joint Providership (ANCC):**

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 who is responsible for the activity. An agreement outlining the roles and responsibilities of all providers must be in place for all jointly provided activities.

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 learner objectives/outcomes and content;
b) selection of the content specialist planners and activity presenters;
c) 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 all collaborating providers are 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 learner objectives/outcomes, (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.”

**Accreditation Statements**

The accredited provider must inform learners of the joint providership relationship through the use of the appropriate accreditation statement(s) prior to the start of each educational activity and on certificates of completion. TUSM OCE will ensure that all course and printed materials for jointly provided activities include the appropriate accreditation statement(s).

NOTE: The accreditation statement(s) do 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 learner objectives/outcomes, then the accreditation statement(s) must be included. The official Accredited Provider statement must be displayed clearly to the learner and worded correctly. For ANCC accreditation, when referring to contact hours, the phrase “accredited contact hour” should never be used. Contact hours are awarded. TUSM OCE must review and approve all marketing and course materials (including websites) before print/distribution/launch.

**(a) Physician Statement (ACCME)**

(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.

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 Credit(s)**™. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

(2) 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 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.

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 Credit(s)™. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

(b) Nurse Statement (ANCC)

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 [insert number of hours] contact hours for nurses.

(c) Pharmacist Statement (ACPE)

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)

Continuing Education Credit/Contact Hours

(a) Physician

TUSM OCE follows the AMA guidelines for AMA PRA Category 1 Credit™, which is awarded based on the formula that 60 minutes of academic content is equal to 1 AMA PRA Category 1 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 AMA PRA Category 1 Credit™. Certificates are usually distributed to participants electronically after the conclusion of the activity. Sign in sheet(s)/attendance verification and the completed participant evaluations are cross-checked before certificates are issued. Participants are notified prior to the beginning of an activity of the requirements for successful completion and how certificates will be awarded.

(b) 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.

(c) 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: 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 to set up a profile.

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

All TUSM OCE activities must be evaluated at the conclusion of the activity. A completed evaluation is required in order for participants to receive credit/contact hours. TUSM OCE has standard evaluation questions that must be included in each activity’s evaluation. In cases of joint providership, the educational partner is responsible for compiling the evaluation summary and submitting it to TUSM OCE.

A follow-up outcomes survey is sent to attendees 8-10 weeks post activity to assess the following based on what was learned at the activity:

- impact on competence and performance
- changes in practice and examples if applicable
- barriers/obstacles in attempting to change practice

Record Retention

As the accredited provider, TUSM OCE maintains specific CE Activity records. Record retention requirements relate to the following two topics:

1. 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.

2. Activity Documentation: TUSM OCE retains activity files/records of CE activity planning and presentation for a minimum of six years.

Live Activity Procedures

Responsibilities of the Course Director, in collaboration with TUSM OCE:

(a) Ensure that the activity is planned and executed in compliance with guidelines of the ACCME, ANCC COA, ACPE and other organizations, if applicable.

(b) Planning, content, and faculty
   - Identify course topic, target audience, needs assessment, goal, learner objectives/outcomes, appropriate faculty, date, and location
   - Make initial contact with potential faculty
   - Support faculty with topic development
   - 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
   - Suggest means of marketing the activity (target audience(s) for mailings, journals for notices, etc.)
   - Sign TUSM OCE Provider and Joint Provider Collaboration Agreement and communicate regularly regarding planning of the activity

   Comply with all requirements and time lines as noted on the TUSM OCE Checklist included in the Education Activity Planning Form, located on our website: http://medicine.tufts.edu/Education/Continuing-Education/Educational-Activities

Regularly Scheduled Series (RSSs)

TUSM OCE certifies over 150 RSS at Tufts affiliated hospitals each year for AMA PRA Category 1 credit™ only. TUSM OCE operates under the regulations of the Accreditation Council for Continuing Medical Education (ACCME) and defines a 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. 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 RSS, forms must be submitted annually for CME approval. RSS forms are available online at: [http://medicine.tufts.edu/Education/Continuing-Education/Regularly-Scheduled-Series](http://medicine.tufts.edu/Education/Continuing-Education/Regularly-Scheduled-Series).

Consultation and training on accreditation requirements, planning form completion, and certificate generation is offered periodically throughout the year and is required for new course directors and/or administrators.

**Enduring Activity Procedures**

**Enduring Materials**

TUSM OCE utilizes a combination of educational formats in addition to live educational activities. These include Internet, monograph, and other self-study formats. TUSM OCE follows the ACCME guidelines regarding enduring materials which state that enduring materials must comply with all applicable ACCME accreditation requirements and policies, including the ACCME Standards for Commercial Support: Standards to Ensure the Independence of CME Activities.

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(s) and/or faculty and the learner, TUSM OCE requires specific information to be communicated to participants prior to starting the educational activity. Please contact TUSM OCE for full requirements related to enduring activities.

Accredited providers may not enlist the assistance of ACCME-defined 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. Sometimes providers will create an enduring material from a live CME activity. When this occurs, 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.

**Journal-based CE**

A journal-based CME 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.

There are specific requirements for journal-based CE. Please contact TUSM OCE for full requirements.

**Internet CE**

TUSM OCE follows the ACCME guidelines regarding internet CE which state that internet CE must comply with all ACCME accreditation policies and the Standards for Commercial Support. However, there are special requirements for Internet CE because of the nature of the activities:

- **Activity Location**: Internet CME activities cannot be placed on a Web site owned or controlled by an ACCME-defined commercial interest.

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

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

**Requirements for Print Materials**
TUSM OCE must review and approval all educational materials (course brochures, syllabi, handouts, etc.) prior to printing and distribution. There is no commercial promotion of products, commercial logos, or any advertising allowed in educational materials (this includes course websites).

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

- Appropriate providership statement, prominently listed
- TUSM logo
- Accreditation statement(s)
- Designation of AMA PRA Category 1 Credits™, contact hours, etc.
- Target audience
- Activity goal(s)
- Learner objectives/outcomes
- 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.
- 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 Activity Planning Form):
http://medicine.tufts.edu/Education/Continuing-Education/Educational-Activities

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

- Appropriate providership statement, prominently listed,
- TUSM logo
- Accreditation statement(s)
- Designation of AMA PRA Category 1 Credits™, contact hours, etc.
- Target audience
- Activity goal
- Learner objectives/outcomes
- 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
• Policy on Privacy and Confidentiality
• TUSM OCE contact information

Additional Requirements for Pharmacy

• 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.

Additional Requirements for Nursing Accreditation
TUSM OCE’s Lead Nurse Planner is accountable for the overall functioning of TUSM OCE’s Provider Unit. 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. A separate evaluation summary shall be prepared for nurse participants.

BUDGET AND FISCAL POLICY
TUSM OCE adheres to both the University’s Finance Policies and Procedures (see http://finance.tufts.edu/policies-procedures/) and the ACCME Standards for Commercial Support) for all continuing education activities.

It is TUSM OCE’s expectation that continuing education activities will promote improvements of quality in health care (and not any proprietary interests of an ACCME-defined commercial interest). 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 and departments);
• Accreditation/management fees;
• Registration fees;
• Exhibitor fees (when appropriate);
• Educational grants from corporations, government agencies, and private and public foundations;
• Commercial Support (educational grants from ACCME-defined commercial interests)

As the accredited provider, TUSM OCE is responsible for ensuring that following decisions are made free from the control of any ACCME-defined commercial interests:
• Identification of CE needs
• Determination of learner objectives/outcomes
• 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 joint providers/educational partners to conduct continuing education activities, the OCE is always responsible for decisions regarding commercial support for CE activities, and requires final activity budgets 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 withdrawal of credits/contact hours from a CE activity.

Honoraria
Honoraria may only be paid by TUSM OCE or a designated joint provider/educational partner, and not by an ACCME-defined commercial interest. Faculty honoraria amounts are determined based on a number of factors and processed in compliance with Tufts University’s finance policies and procedures. 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 non-planner, non-teacher or non-author participants of a CME activity, with the exception of travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, and/or joint provider/educational partner. 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. TUSM OCE and our joint providers/educational partners convey this information in writing along with speaker reimbursement forms and instructions, as well as other necessary payment processing paperwork including W-9 forms, etc.

Travel Reimbursement
The OCE follows the University’s finance policies and procedures for processing faculty and staff travel reimbursement. As an internal OCE policy, faculty are reimbursed for round trip air travel at coach class (or best fare available) for domestic travelers and, with approval, advanced purchase business class for international travelers by the most direct route (and best available rate) from the traveler’s normal place of business to the location of the educational activity. Requests for travel reimbursements from faculty including planners and speakers must include receipts/other appropriate documentation such as completed and signed travel reimbursement forms within 30 days of the activity. Reimbursements forms/invoices will be processed and paid upon receipt, once approved by OCE staff and the University’s Finance/Accounts Payable Department.

Disbursement of Commercial Support, Budget Management, and OCE Fees
Disbursement of Commercial Support: As the accredited provider, TUSM OCE is responsible for maintaining financial documentation for all CE activities, including those with commercial support. Funds from commercial supporters must be in the form of an educational grant. Grant funds/payment is handled in one of the following ways:

1) Generally, grant funds are made payable to “Trustees of Tufts College” and sent directly to TUSM. A commercial supporter may never disburse payments directly to faculty.

2) In some cases, the grant may be made payable to a joint provider/educational partner/third party if designated by TUSM OCE. In this situation, the following information is included in our commercial support agreement:

‘Tufts University School of Medicine (TUSM) Office of Continuing Education (OCE) designates [Name of joint/provider/educational partner/designated payee] to receive $[Amount] for an educational grant from [Name of Commercial Supporter].’
3) Occasionally, TUSM OCE receives the grant funds and funds are transferred to our joint provider/educational partner/third party, with the agreement that TUSM OCE will oversee the budget and disbursement of funds.

Budget Management: For activity budgets directly managed by TUSM OCE, all income (registration fees, grants, etc.) and expenses will be allocated to either a designated account or general account assigned for smaller programs. For all activities, activity budgets are reviewed and approved by OCE staff, and all efforts are made to ensure that activity expenses are closely monitored and managed to meet requirements. Requests for faculty honoraria and travel reimbursements from activity faculty or planners must include receipts/other appropriate documentation. Reimbursements forms/invoices will be processed and paid upon receipt (typically within 30 days of the activity), once approved by OCE staff and the University’s Finance/Accounts Payable Department. When applicable, TUSM OCE will review grant reconciliations and ensure that unused funds are returned if applicable/required by commercial supporters.

For jointly provided activities --- if TUSM OCE designates the joint provider/educational partner to receive the grant, TUSM OCE works with them to ensure that the Standards for Commercial Support are followed. TUSM OCE reviews an estimated budget prior to the educational activity. Also, a final budget is submitted to TUSM OCE for review and approval to ensure that the commercial support was handled appropriately.

In-Kind Support: A commercial support agreement is required noting the nature of the in-kind support, and this must be acknowledged appropriately in course materials prior to the beginning of the activity. TUSM OCE will ensure that the educational activity is planned by course director(s), planners, and TUSM OCE without any control from ACCME-defined commercial interests. The commercial interest cannot have any say in the content, including in what procedures will be taught. Either an OCE staff member is present to oversee instruction or we designate an appropriate faculty member for this role. We require written documentation in which the OCE staff member or designated individual attests that equipment demonstration was about the safe and proper use of the equipment, and did not include clinical recommendations about the medical devices/equipment of the manufacturer(s). Additionally, we ensure that the instructor/faculty member assigned to demonstrate the equipment does not have a relevant financial relationship with the commercial interest who provided the in-kind support.

OCE Fees: Fees for OCE services may include course certification, conference/logistics planning and management, course consultation for planning, instructional design, evaluation distribution and management, and certificate generation and distribution. OCE accreditation/management fees and other applicable expenses are listed appropriately in activity budgets. Additional fees may apply as agreed upon and stipulated with a financial 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 (financial or in-kind):
- Estimated budgets must be submitted for review to the OCE prior to activity.
- The OCE must have full knowledge and approval of any commercial support for an educational activity in advance.
- An ACCME-defined commercial interest 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/educational partner. The agreement must specify the source of commercial support (financial or in-kind) 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 by the OCE.
- TUSM OCE Provider and Joint Provider Collaboration 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 joint providers/educational partners 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, free from commercial bias and do not display any logos or other trademarks.
- All marketing/promotional materials must be submitted to OCE staff for approval prior to print/distribution/launch to ensure that materials communicate appropriate accreditation requirements and are independent of commercial influence and/or promotion.
- Presenter materials as well as final syllabi or course materials are also submitted to OCE staff for review and 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’s medical director, the course director/committee, course planners, and/or OCE’s nurse planner (when applicable) prior to the start of the activity.
- Disclosure of relevant financial relationships with ACCME-defined commercial interests and disclosure of commercial support to the learners must occur prior to the beginning of any activity, with documentation submitted to TUSM OCE to verify that this occurred. Disclosure of commercial support is limited to the name of the commercial interest entity providing support.
- 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 commercial interest logos, advertising, trade name or product group messages.
- An ACCME-defined 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).
- For in-kind support, particularly durable equipment, TUSM OCE and joint provider/educational partner will confirm disbursement of the equipment directly with funder and coordinate details/instructions for delivery and pick-up to/from the educational activity venue. The equipment must be delivered prior to the start of the activity; company representatives cannot be present/involved in the activity. We will confirm that the educational activity is planned by course director(s), planners, and TUSM OCE without any control from the commercial supporter. The commercial supporter cannot have any say in what procedures will be taught, and either an OCE staff member is present to oversee and participate in the actual instruction or we designate an appropriate faculty member. We require written documentation to verify that equipment demonstration was about the safe and proper use of the equipment and did not include clinical recommendations about the medical devices/equipment from the manufacturer(s). Other types of in-kind support (Facilities/Space, Disposable supplies (Non-biological), Animal parts or tissue, Human parts of tissue, or other), follows the same policy.

**PRIVACY AND CONFIDENTIALITY POLICY**

TUSM OCE takes privacy protection very seriously. TUSM OCE collects specific learner data and contact information from all learners in our educational activities strictly for verification of participation and reporting purposes. By participating in our educational activities, learners acknowledge that we can share their data with the third parties responsible for administering those activities such as:

- Accrediting bodies (ACCME, ANCC, or ACPE) if learner is seeking credit/contact hours
- If applicable, third party vendors for payment of registration and activity fees
- Joint Providers/Educational partners associated with the activity for which the learner has registered/attended
- Any Maintenance of Certification program for which learner has registered
- Other accreditation/service providers, if learner requests credit/contact hours, with their permission
- If commercial support is received for an activity, physicians’ information may be reported under the Physician Payments Sunshine Act (Open Payments Program), which requires manufacturers of drugs,
medical devices, and biologicals that participate in U.S. federal health care programs to report certain payments and items of value given to physicians and teaching hospitals.

TUSM OCE will never sell, rent, or lease any personal information of learners who participate in our educational activities. As required by our accrediting bodies, TUSM OCE will maintain data for a minimum period of at least six years.

For questions regarding this policy, contact TUSM OCE at e-mail at med-oce@tufts.edu or via phone 617-636-6579.

Please visit the following link for Tufts University Privacy Statement and Terms & Conditions of Use when accessing tufts.edu or other Tufts University site: https://www.tufts.edu/about/privacy.

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.

NAME USE POLICY
TUSM OCE follows the University’s Name Use Policy. See full policy at: http://legal.tufts.edu/?pid=12

BUSINESS CONDUCT POLICY
TUSM OCE follows the University’s Business Conduct Policy. See full policy at: http://finance.tufts.edu/business-conduct-policy/

INTELLECTUAL PROPERTY POLICY
TUSM OCE follows the University’s Intellectual Property Policy. See full policy at: http://viceprovost.tufts.edu/?pid=6&c=6

GRIEVANCE POLICY
Grievances or complaints may be submitted online via email at 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. 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, TUSM OCE’s Medical Director, Lead Nurse Planner, and Pharmacy Consultant. The results of this appeal will be sent to the participant, no later than 10 working days after the meeting of the committee.
RESOURCES

Websites
Accreditation Council for Continuing Education (ACCME): www.accme.org
American Nurses Credentialing Center (ANCC): http://www.nursecredentialing.org
Accreditation Council for Pharmacy Education (ACPE): www.acpe-accredit.org
American Academy of Family Physicians (AAFP): www.aafp.org
American Medical Association (AMA): www.ama-assn.org
Standards for Commercial Support: 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/