



POLICY AND PROCEDURE

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ISSUED BY:MEDICAL EDUCATION

APPROVED BY:CONTINUING MEDICAL EDUCATION COMMITTEE, POLICY AND PROCEDURE COMMITTEE,
DEISE GRANADO-VILLAR (CHIEF STAFF-SVP MED AFFAIR)

POLICY DESCRIPTION:

CME_POLICY_GOVERNING_HONORARIA_AND_REIMBURSEMENT_OF_EXPENSES_FOR_PLANNERS

SCOPE:

Department-wide -: The department listed above including all employees and contractors or any and all personnel providing services.

PURPOSE:

The purpose of this policy is to delineate the rules and regulations governing honoraria and reimbursement of expenses for CME program planners, teachers, and/or authors. The **ACCME Standard 3.7** states that as a CME provider, (i.e. MCH Department of Medical Education) “*must have written policies and procedures governing honoraria and reimbursement of out-of-pocket expenses for planners, teachers and authors.*” The intent of this Standard is to ensure further separation of personal financial interests and commercial support from educational content. The Policy provides guidance to staff, faculty and joint sponsors in order to comply with the ACCME’s *Standards for Commercial Support.*

DEFINITIONS:

MCH Department of Medical Education defines an **honorarium** as:

- (1) A payment, fee or other compensation received as a gratuity, award or honor, e.g. for delivering a speech, writing or authoring an article or publication.
- (2) MCH does not allow MCH faculty (i.e. MCH medical staff member) to charge a fee to (receive an honorarium from) their home institution for participating in MCH-sponsored educational activities (as speaker or planner).
- (3) The MCH educational mission lies in three areas of physician education: medical students, residency training and the continuing education of physicians. A faculty member’s teaching efforts in these three areas are considered part of their official duties.

POLICY:

- CME activities sponsored by MCH for which honoraria are paid must be compliant with all ACCME policies for accreditation, including the ACCME Standards for Commercial Support.
- No speaker at a CME activity sponsored by MCH may receive payment directly from commercial interests for honoraria, travel or out-of-pocket expenses.

Please refer to the electronic copy for the latest version of the document.

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- Speakers, Medical Directors, Planning Committee members or individuals having any control over activity content may not receive payment directly from a financial supporter for honoraria, travel or out-of-pocket expenses.
 - Funds from commercial support may be used to cover appropriate expenses for the course director, speakers and other 'bona fide' employees of the educational activity, but those funds must come through the Office of Continuing Medical Education and **not** flow directly from the commercial supporter to the individual. (**ACCME Standard 3.12 Appropriate use of commercial support.**)
 - Out-of-pocket, per diem, airfare, ground transportation, and other travel expenses for planners, faculty, speakers, instructors, and authors will be paid in compliance with the MCH policy governing travel reimbursement
- I- MCH Medical Staff Members as Speakers:
- o MCH does not compensate its medical staff members for participating as invited speakers in MCH-Sponsored educational activities
 - o Expenses incurred by MCH medical staff in relation to their participation in the educational activity are reimbursed as outlined by the Institutional Policy on expense reimbursement.
- II- Non-MCH Medical staff invited speakers:
- a. Invited presenters or authors who agree to participate as faculty in MCH-sponsored CME activities may be paid honoraria by the MCH Department of Medical Education after completion of the CME activity.
 - b. The MCH-certified CME activities for which honoraria are paid must be compliant with all ACCME policies for accreditation, including the ACCME Standards for Commercial Support.
 - c. Reimbursement to faculty may be made for reasonable out of pocket expenses for travel (mileage), lodging and meals on receipt of itemized receipts, consistent with institutional policy e.g. coach air travel, meals excluding alcohol,...etc.
 - d. The amount of honoraria should be reasonable, as determined by MCH CME Committee and consistent with relevant institutional policy.
 - e. A reasonable honorarium for category 1 (CME-Approved) events sponsored by the MCH CME Department include amounts up ranging from:



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i. LOCAL INVITED SPEAKERS:

1. Up to \$500 per activity for Junior Faculty (Clinical instructors, assistant professors, or equivalent)
2. Up to \$750-\$1000 per activity for Senior Faculty (Associate Professors, Professors, or equivalent)

ii. NATIONAL/INTERNATIONAL INVITED SPEAKERS:

1. \$500-\$750 per activity for Junior Faculty (Clinical instructors, assistant professors, or equivalent)
2. \$750-\$1500 per activity for Senior Faculty (Associate Professors, Professors, or equivalent)
3. \$1500 or more per activity for Other Faculty (Internationally-recognized faculty) – **Requires Approval by the MCH CME Committee**

PROCEDURE: [description of principal tasks required for performance of an operation, usually constructed in a step-by-step format]

- The CME program planner confirms the speakers by extending the initial invitation.
- Once confirmed, the CME Department is given the list of names of confirmed speakers
- A formal invitation letter/Speaker Confirmation Form that delineates session(s) title(s), Date(s), Time(s), Locations(s), Honorarium (if applicable), ACCME requirements for Disclosures, MCH CME policy on reimbursement for expenses, etc.. The Speaker Confirmation Form is signed by the speaker and returned to MCH CME Department along with the required forms to be completed prior to the CME event
- After completion of the event, speakers eligible for expense reimbursement and honorarium (see above) are reimbursed after they submit their itemized receipts along with a completed “Expense Form” (attached).

REFERENCES: [list of supporting and source documentation used to validate the policy and procedure]