

**Appendix A**  
**FSS-551 Continuing Medical Education**

# UT SOUTHWESTERN POLICY HANDBOOK

## FSS-551 CONTINUING MEDICAL EDUCATION

### CHAPTER 8: FACILITIES AND SUPPORT SERVICES

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#### ADMINISTRATIVE INFORMATION

Responsible Office: Office of Continuing Medical and Public Education  
Executive Sponsor: Vice President and Chief Operating Officer for Academic Affairs  
Effective Date: 01/31/1998  
Last Updated: 01/03/2022  
Contact: [policyoffice@utsouthwestern.edu](mailto:policyoffice@utsouthwestern.edu)

### POLICY RATIONALE AND TEXT

The continuing medical education (“CME”) program of UT Southwestern seeks to maintain and enhance the knowledge, competence, and performance of physicians, scientists, and nursing and allied health professionals practicing in the state and the nation in order to improve patient outcomes. The Office of Public Education and Continuing Medical Education (“CME Office”) is responsible for developing and delivering a CME program that will support the highest levels of professional performance.

#### CME General Policies

1. The CME Office or its designee is required to provide oversight for any program designated for physician continuing education credit at UT Southwestern.
2. UT Southwestern requires that its faculty members and other individuals who act as CME course directors and CME faculty and presenters comply with the Accreditation Council for Continuing Medical Education (ACCME) policies and Standards for Integrity and Independence in Accredited Continuing Education.
3. Commercial exhibitors are allowed in association with continuing education programs as long as they comply with UT Southwestern policies (see [ETH-105 Relationships of UT Southwestern Faculty, Employees, and Trainees with Vendors](#)). In addition, ACCME Standards for Integrity and Independence in Accredited Continuing Education are to be followed when exhibits are employed in conjunction with a CME program. Each exhibitor will execute a letter of agreement for exhibit space separate from any agreement for commercial support.
4. Out-of-state programs are discouraged and may not be planned without the express approval of the UT Southwestern President.
5. Out-of-country programs are discouraged and may not be planned without the express approval of the UT Southwestern President and the Chancellor of the UT System.

## Accreditation and Designation of Credit

1. In order to provide accredited education, the CME Office is required to review and approve all aspects of programs and activities designated for credit, including the planning, delivery, attendance, promotion, and evaluation of each offering. Each proposal for CME activity must be submitted to the CME Office through a CME application, which requires review and approval of the CME Office Leadership and the CME Advisory Board.
2. A proposed program or activity must meet all ACCME criteria and essentials for designation of credit.
3. Any promotional material regarding an accredited CME program or activity must be submitted to the CME Office for approval in advance of distribution to ensure compliance with [ADM-201 Use of UT Southwestern Name, Logo, Logo Signature, and Seal](#) and [ADM-201P-01 Graphic Standards](#) and confirm that the appropriate accreditation and designation statements are included.

Commercial marketing as part of an educational program is prohibited by the State of Texas, the Food and Drug Administration, and the ACCME.

## Financial Policies

1. All income and expenses associated with an accredited CME program or activity must be handled by the CME Office or its designee.
2. The CME Office will comply with institutional requirements regarding expenses, reimbursements, travel, and fees for lecturers.
3. Fees for CME lecturers are limited to the amount allowable and approved by UT Southwestern's Prior Approval of Expenditures Matrix.
4. Positive operating margins from CME programs or activities (i.e., course revenue, minus course expenses, which includes overhead and CME administrative fees) will be returned to the sponsoring department, and negative operating margins will be recovered from the sponsoring department.

When the CME Office receives commercial support from an ineligible company for an accredited CME program or activity, the ineligible company and UT Southwestern must execute a letter of agreement to document the terms, conditions, and purposes of the commercial support and ensure compliance with the ACCME Standards for Integrity and Independence.

## Joint Providership

UT Southwestern may jointly provide and designate for credit CME activities for physicians in cooperation with unaccredited organizations and institutions. UT Southwestern reserves the right to refuse joint providership at any time or when it has been determined that accreditation requirements are not being met. The ACCME requires that joint providership activities be treated the same as any other CME program or activity provided by UT Southwestern and that the UT Southwestern CME Office be integrally involved in the organization, planning, execution, administration, evaluation, financial oversight, and record keeping of all continuing education activities designated for *AMA PRA Category 1 Credit™*. The ACCME standards and policies must be followed for joint providership activities as for any other activity designated for *AMA PRA Category 1 Credit™*.

To maintain required responsibility and control, as applicable, site visits may be performed to ensure that activities are taking place in accordance with the accreditation requirements for the designation of physician credit.

## SCOPE

This policy applies to all individuals associated with or on the premises of UT Southwestern Medical Center, including without limitation employees, faculty, residents and fellows, students, postdoctoral scholars appointed to academic training positions, patients, visitors, volunteers, contractors, and vendors.

## PROCEDURES

### Disclosure and Mitigation of Financial Relationships in CME Program Materials

1. All planners, faculty, and others in control of CME content must disclose to the CME Office all their financial relationships with ineligible companies in the past 24 months.
  - a. The CME Office must mitigate all relevant financial relationships of individuals in a position to control CME content before the individuals assume their roles for impacting content. The CME Office may use the mechanisms from the non-exclusive list below to mitigate relevant financial interests:
    - i. recusal of the individuals from controlling the aspects of content with which they have a relevant financial interest;
    - ii. peer-review of planning decisions (for planners) by persons who do not have relevant financial interests related to the content;
    - iii. peer-review of content (for authors/presenters) by persons who do not have relevant financial interests related to the content;
    - iv. use of evidence-based clinical recommendations free from commercial bias; and/or
    - v. use of other methods consistent with ACCME's content validation standards.
2. Prior to the start of a CME program or activity, the prospective audience must be made aware of an individual's relevant financial relationship by an acknowledgment in the program brochure, syllabus, or handouts that lists the following:
  - a. name of the disclosing individual;
  - b. the name of the ineligible company;
  - c. the nature of the financial relationship(s) with ineligible company; and
  - d. a statement that all financial relationships deemed relevant by the CME Office have been mitigated.
3. The following content validation statement must be included in the syllabus or handouts of all scientific information:

This CME program or activity has been planned to be well-balanced and objective in discussion of comparative treatment regimens, and format allows for the free scientific exchange of ideas. All treatment recommendations in a CME program or 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 conforms to the generally accepted standards of experimental design, data collection, and analysis.

Information and opinions offered by the speakers represent their viewpoints. Conclusions drawn by the audience should be derived from careful consideration of all available scientific information.

4. Prior to the start of a program or activity, all commercial support from ineligible companies must be disclosed to the audience on the activity web page, in the brochure, syllabus, and/or handouts. This disclosure or acknowledgement must not contain the use of a corporate logo, trade name, or product-group message of an ineligible company. The following statement is appropriate to use to disclose commercial support:

“This CME activity is supported by an independent medical education grant from (Insert name of company).”

### **Disclosure for Regularly Scheduled Series Activities**

In the case of Regularly Scheduled Series of ongoing events, such as grand rounds, disclosure shall be made by the moderator of the activity, with said disclosure displayed or distributed for learner review prior to the start of the activity. Written documentation that disclosure information was provided to participants shall be entered in the file for that activity.

### **Additional Disclosures for Conflict of Interest**

The process employed by the CME Office for the disclosure and mitigation of financial relationships in CME program materials is separate from, and in addition to, UT Southwestern’s conflict of interest requirements as described in [ETH-104 Conflicts of Interest, Conflicts of Commitment, and Outside Activities](#). Individuals in a position to control CME content are also responsible for following any relevant COI Management Plan requirements, in addition to any requirements from the CME Office.

## **DEFINITIONS**

**Ineligible company** – a company whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products currently used by or on patients or healthcare products in development for future use by or on patients (e.g., a healthcare product research company).

**Relevant financial relationship** – relationship of any monetary value between an individual in control of continuing medical education content and an ineligible company if the educational content of the proposed continuing medical education is related to the business lines or products of the ineligible company.

## **RELATED STATUTES, POLICIES, OR STANDARDS**

[ADM-201 Use of UT Southwestern Name, Logo, Logo Signature, and Seal](#)

[ADM-201P-01 Graphic Standards](#)

[ETH-105 Relationships of UT Southwestern Faculty, Employees, and Trainees with Vendors](#)

[ETH-104 Conflicts of Interest, Conflicts of Commitment, and Outside Activities](#)

[FIM-351 Prior Approval of Expenditures](#)

*Texas Government Code, Sec. 660.024*

Prior Approval of Expenditures Matrix

## **CONTACTS/FOR FURTHER INFORMATION**

Office of Public Education and Continuing Medical Education 214-648-2317

## **POLICY HISTORY**

January 3, 2022: Updated policy to align with new ACCME standards, which went into effect January 1, 2022.

February 20, 2019: Added a reference to ADM-201 Use of UT Southwestern Name, Logo, Logo Signature, and Seal to #3 under “Accreditation and Designation of Credit” and in the “Related Statutes” section.

October 29, 2018: Reviewed, revised, and published as FSS-551 Continuing Medical Education, combined and deleted FSS-552 Services of Continuing Medical Education, FSS-553 Continuing Medical Education Financial Policies, FSS-554 Accreditation Policies for Continuing Medical Education Programs, FSS-555 Joint Sponsorship of Continuing Medical Education Activities, and FSS-556 Continuing Medical Education Disclosure Policy.

August 23, 2011: Transferred to online *Handbook* as FSS-551 Continuing Medical Education, FSS-552 Services of Continuing Medical Education, FSS-553 Continuing Medical Education Financial Policies, FSS-554 Accreditation Policies for Continuing Medical Education Programs, FSS-555 Joint Sponsorship of Continuing Medical Education Activities, and FSS-556 Continuing Medical Education Disclosure Policy.

January 1998: Published as 6.5 Continuing Medical Education, 6.5.3 Services of Continuing Medical Education, 6.5.4 Continuing Medical Education Financial Policies, 6.5.6 Accreditation Policies for Continuing Medical Education Programs, 6.5.7 Joint Sponsorship of Continuing Medical Education Activities, and 6.5.8 Continuing Medical Education Disclosure Policy.