

<i>Policy #:</i>	11.0	<i>Origination Date:</i>	2003
<i>Subject:</i>	Faculty Management	<i>Date of Last Revision:</i>	July 2015

Upon acceptance of the Activity/Program Director's invitation to participate as faculty, electronic requests for faculty planning data are communicated (the PD is to provide the OCME with faculty name, title, affiliation and email address) as part of the CME application or by email after the planning of the activity has commenced. Timely completion of the faculty/speaker forms through ICMES is critical in the execution of the CME process. The faculty must complete all paperwork at least 7 days prior to the CME activity.

11.1 Copyright Agreement

When submitting a CME activity for OCME approval, the planner is warranting that the material used in the CME activity is original or adheres to copyright laws and/or the CME activity will be conducted in compliance with copyright laws. Copyright entitles the copyright holder to exclusive rights to the reproduction or distribution of his/ her work. If any part of an original work (e.g., text, graphics, tables, images, etc.) is used, the planner and/or presenter must obtain reprint permission from the copyright holder (i.e., author, publisher). The Inova OCME does not evaluate whether the educational material is original work and Inova OCME is held harmless (not responsible) for any copyright infringements by the planner/presenter.

Activity faculties are required to utilize citations for all diagnostic, therapeutic and scientific references.

11.2 Faculty Honoraria Travel and Expense Reimbursement Honoraria Guidelines:

Honoraria for program faculty who contribute to or participate in a CME activity will be determined by the Program Director. Industry supporters of the activity cannot determine honoraria amounts. The following honoraria ranges have been determined to be appropriate and usual by the Inova CME Advisory Committee. This policy governs only those activities sponsored by Inova OCME.

- In most cases Inova faculty speaking for an Inova CME event will not receive an honorarium for participation. In occasional instances, Inova faculty might be paid an educational stipend. This payment shall not exceed \$1,000.
- Honoraria for guest faculty for an Inova CME activity shall not exceed \$2500. In the case of an exceptional speaker that requires a larger honorarium, the Program Director must obtain approval from the Director of OCME.
- No payment shall be given to the director of the activity, planning committee members, teachers or authors, joint provider, or any others involved with the supported activity.
- If teachers or authors are listed on the agenda as facilitating or conducting a presentation or session, but participate in the remainder of an educational event as a learner, their expenses can be reimbursed and honoraria can be paid for their teacher or author role only.

Travel Guidelines:

- Speakers are requested to make their own travel arrangements.

- Travelers are expected to book the lowest available economy class airfare, consistent with business requirements. Inova will not reimburse for first class travel.
 - If a penalty is incurred due to a traveler violating airline ticketing rules, the traveler will be responsible for the additional cost. However, penalties for making changes to or not using non-refundable tickets can be reimbursed if the penalty was unavoidable due to business reasons or circumstances beyond the traveler's control.
- Travelers should choose a reasonably priced hotel with a single occupancy rate.
- Use the lowest cost ground transportation consistent with business needs. For example, many hotels offer free airport shuttles, which should be used whenever practical. Private car service will not be reimbursed unless there are extenuating circumstances.
- Travelers will be reimbursed for reasonable actual meal expenses. When it is not practical to claim actual meal expenses, travelers may use the federally published domestic per diem or foreign per diem rates for meals and incidental expenses applicable for the city of travel.

Process:

- Travelers are expected to submit reimbursement request to the OCME with required supporting documentation within 30 days of incurring the expense or returning from the trip. Out-of-pocket expenses (i.e. airfare, conference fees, mileage, hotel, meals, books, etc.) older than 120 days will not be reimbursed. This means that the faculty and staff have a maximum of 120 days from the date of the transactions to submit expenses to the OCME.

- Faculty should use the Faculty Reimbursement form and include original receipts.
- All expenses should be forwarded to the OCME point of contact for processing.
- CME staff will initiate all payments for speakers. Direct payments to speakers by commercial supporters and sponsoring departments are prohibited. The OCME must document a full account of the disbursing of funds.
- The Inova OCME will not use commercial support to pay for travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of a CME activity.

Payments from cost centers and foundation accounts

- The individual department must provide CME with a cost code to pay for the speaker's honorarium and travel expenses. The CME Office will initiate the transfer of funds.
- The Foundation must provide CME with the foundation fund name and number to pay for the speaker's honorarium and travel expenses. The CME Office will submit the proper paperwork to the foundation for processing.

11.3 Presentations

Slide sets must be submitted for content review two weeks prior to the activity for OCME review to ensure it is non-biased. If necessary, an expert not affiliated with the activity and/or Inova will be consulted to ensure content is evidence-based and non-biased

11.4 Disclosure, Bias & Conflict of Interest

Disclosure

Faculty must disclose real or apparent conflict of interest relating to the topics of the educational activity. In addition, faculty will also disclose any discussions of unlabeled or non-FDA approved drugs or devices, diagnostic or treatment therapies during their presentation(s). All faculties must complete the online Faculty Disclosure Form, linked to their profile in ICMES. This form is intended to disclose to the activity attendees the existence of any real or apparent significant financial interest or other relationship a speaker and their spouse or partner has:

- with the manufacturer(s) of any commercial product(s)
- with provider(s) of any commercial service(s)
- that exists at the time of the activity or existed in the 12 months preceding the activity
- discussed in an educational presentation, whether or not there is direct commercial support for the CME activity.

Each faculty member scheduled to speak at an approved CME activity is required to complete the online Faculty Disclosure Form, linked to their profile in ICMES, whether they are Inova-affiliated or guest faculty. The online form includes:

- name of the CME Activity, activity date and faculty names
- faculty member should answer questions by checking the appropriate box
- faculty member must disclose nature of relevant financial relationship(s), including that there are no relationships to disclose

- if there are relevant financial relationship(s) with non-governmental entities such as commercial supporters within the 12 months prior to the date of the activity, the faculty member must specify:
 - name of the commercial interest
 - nature of relationship the person has with the commercial interest (such as consultant, speaker's bureau)
 - faculty member signs and dates the form.

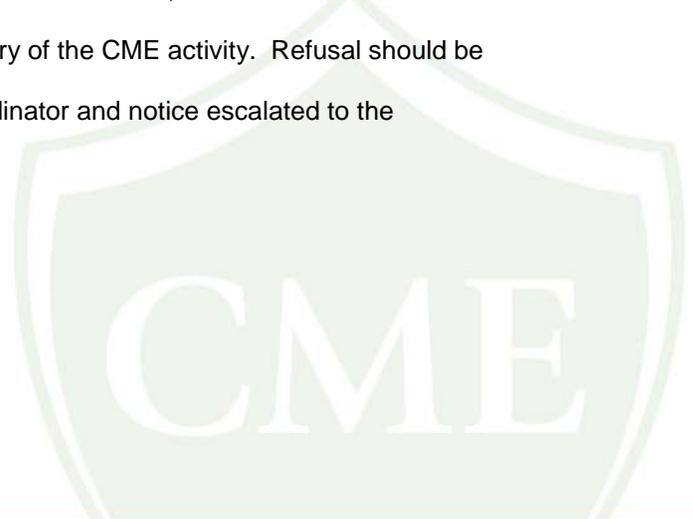
Verbal Disclosure

At the start of the activity, the activity director or speaker will announce to the attendees verbally and/or with visual media (i.e. a slideshow presentation) the disclosure information concerning the event faculty. This includes either:

- disclosure listing specific relations with any pharmaceutical companies
- no significant relationship to disclose

Refusal to Disclose

If a potential faculty member refuses to provide the disclosure, that individual will be not be eligible to serve in any capacity in the delivery of the CME activity. Refusal should be annotated on the online form by the CME coordinator and notice escalated to the Program Director and Director of CME.



Conflict of Interest

It is the policy of the Office of CME at Inova Health System to ensure balance, independence, objectivity, and scientific rigor in all its educational activities. The ACCME/Medical Society of Virginia defines a conflict of interest as existing in presence of any financial benefit to an individual who is in a position to control the content of a CME activity. They have delegated responsibility for defining implementation policy and procedures for this to the accredited providers.

Relevant ACCME/Medical Society of Virginia Standards

- The (CME) provider must be able to show that everyone who is in a position to control the content of an education activity has disclosed all relevant relationships with any commercial interest to the provider.
- An individual who refuses to disclose relevant financial relationships will be disqualified from being a planning committee member, teacher, or an author of CME, and cannot have control of or responsibility for, the development, management, presentation or evaluation of the CME activity.
- The (CME) provider must have implemented a mechanism to identify and resolve all conflicts of interest prior to the education activity being delivered to learners.
- An individual must disclose to learners any relevant financial relationship(s), to include the following information:
 - The name of the individual;
 - The name of the commercial interest(s);
 - The nature of the relationship the person has with each commercial interest.

Identification of Conflicts of Interest (COI)

Planning team members must disclose their relevant financial relationships prior to the activity planning using the *Faculty Disclosure & Conflict of Interest Resolution* form. The speakers, presenters and authors must submit their completed disclosure forms at least 30 days prior to their presentations. If this is not done and there is a conflict of interest found it will be up to the Program Director to find a replacement for the Planning Committee Member or exclude them from the planning of the activity.

Disclosures are used to determine whether or not a conflict exists. Factors to be considered in identifying whether an individual who is in a position to control the content of an activity has a COI include:

- The focus and content of the educational activity
- The individual's role in the activity
- An individual's past financial relationships with or interests in a commercial entity
- An individual's past financial relationships with or interests in a commercial entity pertaining to content of the activity

Procedure to Resolve Conflicts of Interest (COI)

If the individual has no financial relationship, no further action is required.

If the individual has financial relationships with one or more commercial interests, the CME staff assesses potential risk. If a conflict is suspected, the review is escalated to the Director of CME, and the Medical Director of CME, if necessary, for resolution. Inova CME may identify an independent content reviewer to conduct a secondary review.

Mechanisms to Resolve Conflicts of Interest (COI)

The following are potential mechanisms that can be used to resolve a conflict:

- Completion & OCME approval of the *Faculty Disclosure & Conflict of Interest Resolution* form
- Change the focus of the presentation so that the content is not about products or services related to the commercial entity and make recommendations that are based on structured review for best evidence
- Review the presentation slides and handouts prior to activity in light of evidence-based guidelines by the Program Director or the Department Chair and recommend changes if appropriate
- Limit the presentation or material to specific areas in which the financial relationship is not relevant (e.g., presentation limited to data/research – someone else address recommendations)
- Selecting an alternate speaker
- Omitting recommendations for specific products
- Refusal of credit

Monitoring

A variety of monitoring efforts will be implemented as part of this policy.

- Review of COI statements and actions taken in accordance with this policy
- The OCME review of materials to be presented, as appropriate to the Program Director the Director of CME and the Medical Director of CME, as needed.
- Review of evaluation data for presence of bias. Indications of >20% of participants indicating bias in a presentation or in the overall activity will trigger a

retroactive review of all materials presented to the participants, discussion with the Program Director, the Director of CME and/or the CME Advisory Committee. Individuals whose ratings indicate presence of bias may be precluded from future Inova CME activity planning or presentation.

