Inova OCME collects administrative fees, which help defray the costs of coordinating, promoting and executing each activity, as well as accreditation costs. Fees vary based on the type and scope of activity.

The following is an outline of Inova OCME’s event support:

- Full Day or multiple day program: Fees start at $10,000
  
  This includes course logistics, project management, marketing, financial oversight, accreditation, fundraising, and on-site support.

- Half day: Fees start at $6,500

- Activity Credit Fees: Minimum fee of $1500 to provide credit (no logistics or planning) for a CME Activity
  - 1-3 Credits - $1,500
  - 4-8 Credits - $3,000
  - 9-13 Credits - $5,000
  - 13+ Credits – Fees to be negotiated with the OCME

- RSS Planning Fees: varies based on size of operating unit and number of RSS activities.
  
  Fees are collected through medical staff dues.
• Joint Providership Fee: Minimum fee of $2,500. Fees and the terms for payment will be delineated in an aforementioned letter of agreement between Inova CME and the joint provider.

• Enduring Materials (Live for maximum of 1 year): Fee: $1,500

• Rush Fees: Any application that is submitted less than 45 days before the RSS/Activity/Enduring Material start date will be subject to a $500 rush fee. Inova CME does not accept applications less than 30 days from the start of the activity. Any lapse in application for a recurring RSS will incur a $500 fee.

Recovery of Fees: Planning fees will come directly from the sponsoring department/service line’s cost center. Fees will be the first line item taken out of any incoming funds, prior to other reimbursement.

13.1 Registration and Tuition Fees

Per Phase III of the Stark Law, CME providers cannot grant free or discounted CME to physicians or other health care professionals. This phase, released in 2007, clarified the relationship of Stark to CME. “Free or discounted CME could violate the law because CME has value (non-monetary compensation).”

The Stark Law allows non-monetary compensation to be provided by a Healthcare facility to a physician provided it is under the $359.00 annual limit and tracked by the facility.

There are exceptions to the Stark Law Phase III provision. CME can be granted for free if:
CME is for compliance training

CME programs that provide a DIRECT BENEFIT to hospitalized patients (ex. prevention of nosocomial infections)

CME addressing requirements of Federal, State or local laws that govern the conduct of physicians

Stark violation “Red flags”:

- Unique high-tech equipment at your facility
- CME program linked to marketing for the hospital

Based on these regulations, the Inova OCME charges for each credit hour it accredits an activity. This fee is regarded as “Tuition” or “Registration” fee and is charged to the learner to register for an event. Credit fees for RSS activities are collected in medical staff dues. The Fair Market Value for CME is $25/credit hour, unless specific information about the particular education in question indicates a different amount. The fair market value of related expenses must be determined from the course materials or, if no materials are available, from similar education programs.

13.2 Financial Responsibility

The department/service line sponsoring the activity is responsible for the activity’s cost and any deficit that the event may incur. The OCME does not directly fund CME activities from its operational budget; therefore, meetings must be funded through grants, exhibitor fees, tuition and the department/service line. Although the OCME will assist with funding efforts, the sponsoring department/service line must agree to fully fund any program that the OCME accredits and coordinates. If the OCME is coordinating the activity, a projected budget will be developed and
managed by the OCME. The sponsoring service line must provide a cost center to the OCME for payment of expenses.

Surplus funds derived from grants awarded to specific events cannot be dispersed to either party and will be returned to the commercial supporter or placed in a foundation account to be used the following year for the same activity, per commercial support accreditation policies. Additional surplus funds from CME events will be split between the OCME and the sponsoring department.

The activity expenditures include any and all expenses derived during the planning and execution of the activity, including a planning fee paid to the OCME. Any events or materials not related to the stated educational activity will not be coordinated by the OCME nor paid through the activity’s CME budget.

Fundraising contacts will be determined by the Program Director and the department/service line. The OCME coordinator will work with the potential sponsor(s) to obtain support for program costs. The Program Director, Co-Director and/or Planning Committee must take an active role in fundraising.

In the event that fundraising efforts do not cover the budget, the Program Director will be contacted as soon as possible prior to the program. At this time, it is the option of the Program Director and/or the Department Chairman to cancel the program. Depending on when the program is cancelled, there may be fees for which the Program Director and/or Department Chairman will be responsible.
If the program has a deficit and the Program Director and/or Department choose to continue with the program, or if there is a deficit post-event, the sponsoring department/service line is solely responsible for paying the balance of the deficit. At the completion of the program, the OCME coordinator will forward a copy budget to the accounting representative from the sponsoring department/service line.