

### **Purpose**

To ensure NYU School of Medicine (NYU SOM) is able to fulfill its responsibilities in Joint Providership as required by ACCME Essential Areas and policies and Updated Criteria.

### **Policy**

NYU SOM holds its jointly-provided activities to the same standards as the activities it directly provides with regard to fulfillment of its CME mission, needs assessment, evaluation, documentation, and compliance with the ACCME accreditation requirements and criteria, as well its policies with regard to commercial support and enduring materials. The following describes conditions that must be met in any joint providership into which NYU SOM may enter:

- **Educational Partner Questionnaire.** The proposed joint provider must complete the educational partner questionnaire to confirm they would not be considered a commercial interest under the updated ACCME definition (ACCME SCS 1.2) Furthermore, the mission of each potential joint provider will be reviewed by the Sr. Accreditation Manager and Administrative Director to determine if it is consistent with the NYU SOM mission statement.
  - An NYU SOM faculty member must be involved in the planning of any NYU SOM joint-provided activity. As such, an NYU SOM faculty may act as the course director or be a member of the activity planning committee.
  - NYU SOM must be involved in the planning and development of any jointly provided activity it designates for credit. As with other activities, the NYU SOM Sr. Accreditation Coordinator and Administrative Director must review and approve the needs assessment process, the learning objectives, design of the educational activity, faculty selection, and evaluation methodology through use of the NYU SOM application process (ACCME SCS 1.1). As with directly-provided activities, course directors and activity planners are required to submit their completed COI disclosure forms via the application. [See Policy on Standards for Commercial Support]
- **Grant Requests.** In order to assure compliance with the ACCME Standards for Commercial Support, all educational grant requests must be submitted by the NYU SOM, and NYU SOM must approve and sign all letters of agreement (ACCME SCS 3.3-3.6; 3.9) No other funds may be given without NYU SOM's full knowledge and approval. The commercial supporter(s) must be acknowledged in the activity's materials. At the end of the activity, the joint provider is required to submit a reconciled budget for the entire activity.
- **Responsibilities.** The responsibilities of the non-accredited provider will be clearly enumerated through this policy as well as the Joint Provider Timetable and Responsibility Chart (attached). NYU SOM will not certify any joint-providership activity if the non-accredited provider fails to meet its obligations as described in the Joint Provider Timetable and Responsibility Chart or fails to comply with this policy.
- **Accreditation Fee.** NYU SOM will charge an accreditation fee for its services as outlined in the application documents. Should NYU SOM require that outside clinician act as the independent reviewer, an additional honoraria for the reviewer will be charged.
- **Activity Announcements.** NYU SOM must review and approve all materials associated with the activity prior to their release. The following joint providership statement must appear on all material:
  - **Accreditation Statement** — This activity has been planned and implemented in accordance with the Accreditation Council for Continuing Medical Education accreditation requirements and policies through the joint providership of NYU School of Medicine and <insert name of joint provider(s)>. NYU School of Medicine is accredited

by the ACCME to provide continuing medical education for physicians.

- Additionally, the following information must be included in any promotional materials:
  - **Joint Providership Statement** (on front page) — “Jointly Provided by NYU School of Medicine and <name of joint provider>”
  - **Credit Designation** — The NYU School of Medicine designates this <insert activity type> for a maximum of \_\_\_ *AMA PRA Category 1 Credits*™. Physicians should claim only the credit commensurate with the extent of their participation in the activity.
  - **Statement of Need** — Add a simple one paragraph statement that summarizes the need identified in the application documents
  - Learning Objectives
  - Target Audience
  - Disclosure Policy
  - Acknowledgment of Commercial Support (if applicable)
- **Faculty Communications.** [See Policy on Faculty Honoraria and Policy on Faculty Reimbursement for Travel and Accommodations] The NYU SOM faculty and planner letter, which summarizes NYU SOM policies in regards to faculty honoraria and reimbursement of travel and accommodations, must be utilized by the joint provider. Additionally the NYU SOM COI disclosure form must be sent with the letter.
- **Identification of COI.** [See Policy on Disclosure] The joint provider shall be responsible for the collection of completed disclosure forms as well as the creation of a disclosure summary listing all individuals who are involved with planning the content of an activity, using the Disclosure Summary Checklist. All completed COI disclosure forms and disclosure summary must be submitted to NYU SOM for review and approval.
- **Resolution of COI.** [See Policy on Collection and Resolution of Conflicts of Interest (COI)] The NYU SOM Sr. Accreditation Coordinator will review the disclosure summary and submitted COI disclosure forms and identify any conflicts of interest as well as the action taken to resolve it, including a letter outlining the requirements for referencing evidence in context that will be sent to all individuals who have identified a conflict of interest. Additionally, all presentations by these individuals will be submitted for review by an independent reviewer. The joint provider shall be responsible for the selection of an independent reviewer (or request that NYU SOM identify an appropriate individual.) This reviewer shall confirm through completion of the COI disclosure form that he/she does not have relevant financial relationships regarding the activity.
- **Monitoring for Conflict.** A mechanism will be provided for participants to evaluate commercial bias within the activity. The SOM office will analyze data for each planner/presenter/author, and will use that data in making decisions about future jointly provided activities.