

SECTION: 14 Faculty Affairs

AREA: Continuing Medical  
Education

NUMBER: 14.05.06

SUBJECT: Continuing Medical Education Live Activities – Conferences, Symposia, RSS

## I. Purpose and Scope

- A. This policy establishes the requirements and procedures for planning and delivering live continuing medical education (CME) activities at the Tilman J. Fertitta Family College of Medicine. It is intended to ensure that all live CME activities – including in-person conferences, grand rounds, workshops, and live virtual or hybrid events – are designed and implemented in accordance with Accreditation Council for Continuing Medical Education (ACCME) standards and best practices. Adhering to these standards supports high-quality education that improves physician competence and patient care while maintaining compliance with accreditation requirements. The policy underscores the college's commitment to fair, balanced, evidence-based education that is free from commercial influence.
- B. This policy applies to all live CME activities provided or jointly provided by the College of Medicine's Office of Continuing Medical Education. It covers single live events, such as conferences and symposia, regularly scheduled series, such as grand rounds, and other live courses conducted in person, via live internet, or in hybrid format. All faculty, staff, activity directors, planning committee members, and presenters involved in live CME activities are expected to adhere to policy.
- C. This policy does not cover enduring materials or other non-live CME formats, which are addressed under separate policy.
- D. In cases where the college jointly provides an activity with a non-accredited entity, this policy applies in full.
- E. This policy is specific to accredited CME activities for physicians and does not govern non-CME educational events or activities offered outside the auspices of the college's accredited CME program.

## II. Policy

- A. The Tilman J. Fertitta Family College of Medicine will plan and implement all live CME activities in compliance with ACCME accreditation requirements, including the ACCME *Standards for Integrity and Independence in Accredited Continuing Education*, and in

alignment with the college's CME mission. All live activities (in-person, virtual, and hybrid) must be developed free of commercial bias and based on valid content to ensure learners receive accurate, evidence-based, and balanced education. The college is committed to maintaining the integrity of CME by upholding principles of independence, transparency, and scientific rigor in every live activity. No format of live activity has priority over another; regardless of whether an activity is conducted face-to-face, online, or in a hybrid setting, it must meet the same standards of quality, integrity, and compliance with this policy.

### III. Definitions

- A. **Continuing Medical Education (CME):** Educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance that physicians use to provide care for patients, the public, or the profession. CME content encompasses knowledge and skills generally recognized within basic medical sciences, clinical medicine, and healthcare delivery.
- B. **Live Activity:** A CME activity that occurs at a scheduled time, in which participants engage in real-time interaction with faculty (in person or remotely). Live activities may be single events (e.g., a conference or seminar) or part of an ongoing series. Examples include live conferences, workshops, grand rounds, and live webinars. A live activity may be conducted in-person (with faculty and learners physically attending at a venue) or as a Live Internet Activity (virtual participation via web/teleconference), or as a Hybrid Activity combining in-person and remote participants simultaneously. All such formats are considered “live” CME for the purposes of this policy.
- C. **Regularly Scheduled Series (RSS):** A type of live activity consisting of multiple, ongoing sessions (on a weekly, monthly, or quarterly schedule) that is primarily directed towards the institution's own professional medical staff. Each session in an RSS (for example, Grand Rounds) has a different educational topic and objectives, while the series as a whole has an overarching purpose and objectives. RSS's are planned as one CME activity with multiple occurrences.
- D. **ACCME:** The Accreditation Council for Continuing Medical Education, the accrediting body responsible for establishing standards and criteria for high-quality CME. The College of Medicine's CME program operates in accordance with ACCME requirements to provide *AMA PRA Category 1 Credit™* to physician learners.
- E. **Standards for Integrity and Independence:** Refers to the ACCME *Standards for Integrity and Independence in Accredited Continuing Education* (released in 2020) which all accredited CME providers must follow. These Standards are designed to ensure CME content is valid, evidence-based, and free from the control of commercial interests, creating a clear separation between education and any marketing or sales activities. Key aspects include ensuring content validity, preventing commercial bias, identifying and mitigating conflicts of interest, and managing any commercial support appropriately.
- F. **Ineligible Company:** An “ineligible company” is defined by ACCME as any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. This typically includes pharmaceutical manufacturers, medical device companies, and biotech firms. Providers of direct clinical services to

patients, such as hospitals or group clinical practices, are not considered ineligible companies. Ineligible companies are prohibited from participating in and influencing CME content and may not serve as joint providers for CME activities.

- G. **Financial Relationship:** A financial relationship is a relationship in which an individual benefits by receiving salaries, consulting fees, honoraria, ownership interests, stocks, stock options, royalties, intellectual property rights, or other financial benefits from an entity. For CME purposes, financial relationships usually refer to those with ineligible companies (e.g. serving as a consultant, speaker, advisor, employee, or investor in a company whose products are discussed in the CME content). Relevant Financial Relationship means a financial relationship of any amount, regardless of monetary value with an ineligible company, occurring within the past 24 months, that may pose a conflict of interest in relation to the content of the CME activity. Financial relevancy is determined by whether the educational content is related to the products or business lines of the ineligible company with which the person has a relationship.
- H. **Conflict of Interest (COI):** Circumstance in which an individual's financial relationship with an ineligible company has the potential to bias the content of the CME activity in favor of that company's products or services. In ACCME terms, a conflict of interest exists when there is a relevant financial relationship that could compromise the objectivity or integrity of educational content. All persons who have control over CME content (planners, faculty, reviewers, etc.) are required to disclose such relationships so that they can be identified and mitigated by the Office of Continuing Medical Education.
- I. **Activity Director:** The faculty member or designee responsible for the overall development and execution of a CME activity (also referred to as the Course Director or Program Director). The Activity Director leads the planning committee, identifies educational needs, formulates learning objectives, ensures content integrity, and serves as the primary contact with the Office of Continuing Medical Education for that activity.
- J. **Planning Committee/Planning Team:** A group of individuals, which may include the Activity Director, other faculty subject matter experts, target audience representatives, activity coordinators, Office of Continuing Medical Education staff and/or CME Committee members, who collaborate to plan and implement a CME activity. The planning committee is responsible for conducting needs assessment, content planning, speaker selection, and ensuring the activity meets all accreditation requirements. All planners must disclose any relevant financial relationships and uphold the Standards of Independence during the planning process.
- K. **Presenter/Faculty:** An individual (speaker, instructor, panelist, moderator, or author) who presents or develops content for a CME activity. Presenters are responsible for delivering content that is evidence-based, balanced, and free of commercial bias. They must disclose relevant financial relationships prior to the activity and adhere to any safeguards put in place to mitigate conflicts. "Faculty" in this context refers to all individuals in control of content, including speakers and moderators.
- L. **Joint Providership:** A collaborative arrangement where an accredited CME provider (e.g., the College of Medicine's Office of Continuing Medical Education) partners with a non-accredited entity to plan and implement a CME activity. In a jointly provided activity, the accredited provider remains responsible for ensuring ACCME compliance for the activity.

(ACCME prohibits ineligible companies from being joint providers of CME; the non-accredited partner must not be an ineligible company) A written agreement (Letter of Agreement) will outline roles and responsibilities between the College and the joint provider. By contrast, a directly provided activity is planned and executed solely by the College (the accredited provider) without outside partners, and a co-provided activity is one planned by two or more accredited providers in partnership.

- M. **Commercial Support:** Financial or in-kind contributions given by an ineligible company to support the costs of a CME activity. Examples include educational grants, donations of equipment or materials, or sponsorship of certain activity expenses. Commercial support must be managed in accordance with ACCME Standard 4 to ensure it does not influence the educational content or presentation. (Commercial support is distinct from exhibit or advertising income, which is a payment for marketing opportunities and not considered “support” of the educational content, though it too must be managed with strict separation from the CME content.)
- N. **Continuing Medical Education Committee (CMEC):** The College of Medicine’s Continuing Medical Education Committee is an oversight body that assists the Office of Continuing Medical Education in reviewing activity proposals, advising on educational quality, and ensuring compliance. The CMEC may review needs assessments, planning documents, and evaluation data, and provides guidance and final approval for CME activities as part of the accreditation oversight process.

## IV. Supporting Policy Information

### A. Roles and Responsibilities

To ensure successful planning, implementation, and compliance of live CME activities, the following parties have defined roles and responsibilities:

- a. **Office of Continuing Medical Education (CME Staff):** The Office of Continuing Medical Education has primary responsibility for oversight of all accredited CME activities. It provides guidance and support to activity planners from inception to completion of an activity. The Office of Continuing Medical Education is responsible for reviewing and approving CME activity applications and planning documents, ensuring that all accreditation standards and requirements are met during planning and execution, and maintaining all documentation for accreditation purposes. The office staff advises on ACCME compliance (e.g. appropriate disclosure collection, content review for bias, inclusion of required statements) and coordinate communication with the Continuing Medical Education Committee (CMEC) and accrediting bodies. They also facilitate the evaluation process and handle issuance of credit and certificates. In jointly provided activities, the Office of Continuing Medical Education ensures that agreements are in place and that the partner abides by all ACCME policies.
  - i. The Office of Continuing Medical Education does not handle event logistics, such as securing venues or managing audio-visual setups, or honoraria. Operational details are managed by the hosting department

or activity planners. The Office of Continuing Medical focuses only on the accreditation-related aspects.

- b. **Continuing Medical Education Committee (CMEC):** The CMEC is an advisory and oversight committee that works with the Office of Continuing Medical Education to uphold the quality and integrity of the CME program. The committee may review needs assessments, activity proposals, content outlines, and evaluation summaries. The committee aids in ensuring all activities address identified educational gaps and meet learner needs. The CMEC also participates in resolving conflicts of interest when identified and contributes to periodic review of CME policies and practices. The CMEC, along with the Office of Continuing Medical Education staff, may approve or deny CME credit for proposed activities based on compliance with requirements.
- c. **Activity Director (Course Director):** The Activity Director is accountable for the content and overall conduct of the CME activity. The Activity Director identifies the target audience and learning needs, establishes measurable learning objectives, and designs the educational format and agenda to address the identified gaps. The Activity Director leads the planning team, coordinates the involvement of speakers and moderators, and serves as the primary liaison with the Office of Continuing Medical Education for that activity. They must ensure that all planners and faculty for the activity submit the required disclosure of financial relationships in a timely manner to the Office of Continuing Medical Education and they assist in resolving any conflicts of interest. The Activity Director also oversees the evaluation process. e.g., encouraging participants to complete activity evaluations and using feedback for improvement. If an activity is jointly provided, the Activity Director works closely with the Office of Continuing Medical Education and the partner organization to fulfill all planning and documentation requirements. Activity Directors are expected to uphold ACCME Standards by ensuring the activity's content is scientifically valid and free of commercial bias.
- d. **Planning Committee Members (Activity Planners):** Individuals involved in the planning process share responsibility for needs assessment, content planning, and speaker selection. Planning committee members, including the Activity Director and any co-directors or content experts, must all disclose any relevant financial relationships with ineligible companies at the start of the planning process. The planning committee collaborates to develop evidence-based and balanced content, selecting topics and educational methods appropriate for the identified gaps. Planners must ensure that no commercial entity influences or controls the educational content or speaker selection. If a planner has a relevant financial relationship, they must recuse themselves from decisions where a conflict could influence educational content, or the conflict must be mitigated, (e.g., by peer review of content) as per ACCME guidelines. Planning committee members also assist in the review of speaker presentations, as needed, for scientific rigor and absence of bias. The planning committee is responsible for adhering to timelines for submitting planning documents, e.g., needs

assessment data, agenda, speaker disclosures, presentation materials, to the Office of Continuing Medical Education for review.

- e. **Presenters/Faculty (Speakers, Moderators, Authors):** All individuals delivering or controlling educational content in a CME live activity are required to follow the college's content and disclosure policies. Faculty must disclose to the Office of Continuing Medical Education, and the activity planners, all financial relationships with ineligible companies within the past 24 months, prior to content development. Presenters/faculty must cooperate with any required conflict of interest mitigation strategies – for example, agreeing to have their slides or lecture content peer-reviewed if a potential conflict is identified, or refraining from making recommendations related to a product of a company with which they have a relationship. During their presentations, faculty are expected to use generic names for therapies where possible and ensure that the educational content is scientifically valid, objective, and free of promotional bias. ***Under no circumstance are presenters to engage in marketing or sales of any product or service during an accredited CME activity.*** This includes avoiding overt product endorsements or urging learners to use a particular proprietary drug or device. Presenters must also not distribute any promotional materials, such as brochures or branded items, in the educational space. Faculty are responsible for delivering content that meets the stated learning objectives and for respecting time allocations and educational formats as planned. If discussion of unlabeled or investigational uses of products occurs, faculty should explicitly disclose this to learners. Finally, presenters should encourage and participate in audience discussions and questions in a balanced manner, and they are expected to adhere to any content validation requirements, e.g., not presenting recommendations outside the standard of care without clearly identifying them as experimental or opinion based.
- f. **Joint Provider (Non-Accredited Education Partner):** In cases of joint providership, the partnering non-accredited organization must collaborate closely with the college's Office of Continuing Medical Education and abide by all ACCME requirements. The roles and responsibilities of the joint provider will be specified in a written Letter of Agreement. Typically, the joint provider may assist with identifying educational needs, providing logistical support, recruiting attendees or faculty, and financially supporting the activity (if applicable), but they cannot circumvent or violate ACCME standards. The College of Medicine, as the accredited provider, retains final authority over activity content, speaker selection, and educational design to ensure independence. Joint providers are prohibited from engaging in any unapproved promotional or marketing activities in association with the CME event. If a joint provider fails to meet its obligations or comply with this policy and accreditation requirements, the college's Office of Continuing Medical Education reserves the right to withdraw from the joint providership arrangement or cancel the CME credit for the activity.
- g. **Learners (Participants):** Physician and health care professional attendees of CME live activities are expected to engage in the educational activity for its

entirety (or for the segments appropriate to their credit claim) and to provide feedback through evaluation mechanisms. Learners should claim only the credit commensurate with the extent of their participation. They are encouraged to evaluate the activity's objectivity, scientific rigor, and absence of commercial bias as part of the post-activity evaluation. If a learner perceives any bias or conflict of interest during the activity, they should report it in the evaluation or directly to the Office of Continuing Medical Education. Learners' personal information, e.g., contact details, will be protected. Per its policy, the Office of Continuing Medical Education will not release participant contact information to any commercial interests or ineligible companies without explicit consent of the individual, in accordance with ACCME standards and College policy.

#### **B. Planning Requirements for Compliance with ACCME Standards**

All live CME activities must be planned and conducted in a manner that fulfills ACCME accreditation criteria and the *ACCME Standards for Integrity and Independence*. The following requirements must be met by activity planners and the Office of Continuing Medical Education during the planning and implementation process:

- h. **Needs Assessment and Gap Analysis:** Each CME activity must be based on identified educational needs of the target audience. Planners will conduct a needs assessment through methods such as surveys, evaluations of prior activities, quality or performance data, literature review, or expert input to determine the gaps in learners' knowledge, competence, or performance that the activity will address. The identified professional practice gaps, i.e. the difference between current practice and best practice, should be documented, as they form the foundation for the activity's purpose and learning objectives.
- i. **Learning Objectives:** Clear, measurable learning objectives must be defined for the activity, derived from the needs assessment. These objectives should specify what the learners are expected to achieve or implement in practice after participation in the activity. Learning objectives guide content selection and teaching methods and will be communicated to learners in activity materials. For an RSS, such as grand rounds, both overall series learning objectives and individual session objectives are to be established.
- j. **Content Development and Validation:** The content of the CME activity must be evidence-based, up-to-date, and unbiased. All recommendations involving patient care must be based on current science, evidence, and sound clinical reasoning, and should offer a balanced view of available therapeutic options. Scientific research referenced in the activity should conform to accepted standards of experimental design and interpretation. New or emerging topics or approaches may be included; however, these should be clearly identified to learners as experimental or under investigation and not presented as established fact or endorsed practice. The college will not advocate or allow the promotion of unscientific or ineffective practices in any CME activity. Faculty, as content developers, are expected to ensure accuracy and avoid any bias. The Office of Continuing Medical Education and/or the CME Committee may require peer review of presentations or the content outline prior to the activity, especially if a

presenter disclosed a financial relationship, to validate content and ensure compliance with these standards.

- k. **Independence from Commercial Influence:** Planning and decision-making for CME content, faculty, and format must be conducted without any influence or control from ineligible companies. Owners and employees of an ineligible company cannot participate in or guide the planning of CME content. When selecting topics and speakers, activity planners must base decisions on identified educational needs and qualifications of faculty and not on any recommendations by a commercial entity or because of any financial incentives. Content about specific products or services should be presented objectively, with generic names used where possible and a fair discussion of alternatives. Absolutely no “scripting” or direction from industry is permitted in content development.
- l. **Disclosure of Financial Relationships:** All individuals in a position to educational control content, for example, activity directors, planning committee members, faculty/presenters, moderators, facilitators, and others who have influence over the content, must disclose to the Office of Continuing Medical Education **all** financial relationships with ineligible companies within the previous 24 months, regardless of the amount. This disclosure must occur prior to the individual assuming their role in the activity’s planning or delivery. The Office of Continuing Medical Education will collect and review the disclosures and the Office of Continuing Medical Education will determine relevant financial relationships – i.e., those relationships that relate to the content of the activity and thus could pose a conflict of interest. There is no minimum dollar threshold for disclosure; any financial relationship is considered, as even small interests could potentially bias education. The disclosure information or the lack of relevant relationships must also be made transparent to learners before the activity in handouts, slides, or announcements at the start of the activity in accordance with ACCME requirements.
- m. **Conflict of Interest Identification and Mitigation:** For any person with a relevant financial relationship, the Office of Continuing Medical Education and/or the CME Committee or Activity Director will implement strategies to mitigate conflicts of interest prior to the individual’s involvement in the CME activity. Mitigation actions may include but are not limited to: having content reviewed by an independent reviewer with no relevant conflicts; revising the content to remove bias; assigning a different speaker or planner without conflicts for portions of the content dealing with the related product or topic; or implementing peer review during the activity, for example, having a moderator monitor for bias. In some cases, an individual with an unresolvable conflict will be disqualified from participation in the planning or presentation. Mitigation steps will be documented. The goal is to ensure that no accredited education is influenced by the financial interests of those controlling content.
- n. **Transparency to Learners:** Prior to the beginning of a CME activity, the provider must inform learners of the presence or absence of relevant financial



relationships for all individuals in control of content. This typically involves disclosing the names of faculty/planners, the name of the ineligible company and nature of the relationship, and a statement of how the conflict was mitigated, OR a statement that an individual has no relevant financial relationships. Learners must also be informed of any sources of commercial support for the activity. All disclosure information should be communicated in written form on slides, program syllabus, electronic materials and verbally communicated at the activity's outset. The Office of Continuing Medical Education will ensure all disclosures are properly made and will provide standardized wording to be used. This transparency is crucial for maintaining a trust with the learner that the education is free of commercial bias.

- o. **Content Integrity and Absence of Commercial Bias:** CME content including presentation slides, abstracts, handouts, and verbal delivery, must be free from commercial bias for or against any product or service. Presenters should not promote or sell any products or services that derive from their professional or financial interests during the education. **Brand names of specific products should be used sparingly and only when necessary for clarity; generic or class names are preferred. No commercial logos or branding of an ineligible company may appear in educational materials or slides.** The Office of Continuing Medical Education will review materials to ensure compliance. CME presentations must not include any advertising, trade logo, or product-group messages. Live activities are to be structured to ensure educational content is kept separate from any ancillary promotional activities.
  - i. An industry exhibit or display must be in a different room or location and separate from the educational sessions. Exhibits and nonaccredited education developed by or with influence from an ineligible company or with planners or faculty with unmitigated financial relationships must not occur in the educational space within 30 minutes prior or 30 minutes after an accredited education activity.
- p. **Appropriate Use of Commercial Support (if applicable):** In the event that a live CME activity receives commercial support via financial grants or in-kind support from an ineligible company, such support must be solicited, accepted, and managed in strict accordance with ACCME Standard 4. All commercial support must be documented by a written agreement that is signed by the commercial supporter and the college (and joint provider, if applicable) prior to the activity. This agreement will detail the terms of the support, including that the funds are unrestricted and will be used solely for legitimate educational expenses which include speaker travel, meeting logistics, modest attendee meals, etc., and that the commercial supporter will have no influence over content, topic, speaker, or any other aspect of the CME activity. The Office of Continuing Medical Education is responsible for overseeing the budget and use of commercial support funds to ensure they are spent in compliance with both ACCME rules and University of Houston fiscal policies. All commercial support must be disclosed to learners prior to or at the beginning of the activity -- "This activity is supported by an

educational grant from XYZ Pharma”. Commercial supporters may not condition their contributions on the selection of content or faculty, and no promotional activities by the supporter are allowed to occur in the educational space or in a manner that interferes with the CME content.

- q. **Separation of Promotion from Education (Ancillary Activities):** Marketing, exhibits, or non-accredited educational activities, such as industry-sponsored presentations that are not part of the CME activity, must be kept separate from the accredited CME activity in both time and space. If the CME activity is part of a larger event that includes commercial exhibits or sessions, the CME content must not be intermixed with commercial content. For example, commercial exhibits should be located in a different room or area from where educational sessions take place. If in the same room, accredited education and nonaccredited activities may take place as long as they are separated by a 30-minute buffer and the nonaccredited activity is clearly labeled as a nonaccredited activity. Sales representatives or industry agents are not permitted to engage with learners during the educational sessions and should not distribute any promotional materials in the vicinity of the CME activity room. Ancillary promotional events like an optional industry-sponsored luncheon will not be designated for CME credit and should not compete with or overlap with the accredited education content time. The accredited provider will also ensure that learner information is protected: names or contact details of CME participants will not be shared with any ineligible company or its agents without the explicit consent of the individual, in compliance with privacy standards and college policy.
- r. **Participant Engagement, Evaluation Metrics and Outcomes:** Each live CME activity is expected to include mechanisms for learner engagement such as Q&A sessions, case discussions, audience response, etc., as appropriate to format to enhance learning and allow faculty to clarify content. Each activity must include an evaluation process to gather data on its effectiveness, compliance and intended changes in knowledge, competence, performance, and where applicable, patient outcomes. Post-activity evaluations are to include open ended and scaled questions to assess achievement of learning objectives, the quality and relevance of the content, the effectiveness of faculty, and whether the activity was free from bias. Learners must be asked what changes they intend to make in practice as a result of their participation in the activity. The Office of Continuing Medical Education and activity planners will review the submitted evaluations to assess outcomes and identify intended changes and improvements. Evaluation results will be used to make continuous improvements to future CME activities and to demonstrate compliance with ACCME criteria involving changes in learner competence or performance as required by ACCME. The Office of Continuing Medical Education is responsible for ensuring that evaluation data are collected and summarized to inform continuous quality improvement and to demonstrate impact across CME activities.

- s. **Integration with Faculty Development:** The CME program is a core component of the College of Medicine's broader faculty development strategy. The Office of Continuing Medical Education collaborates with academic departments and institutional leadership to align CME topics with faculty development priorities, clinical improvement initiatives, and strategic goals. CME activities may complement other faculty support programs such as teaching workshops, mentorship initiatives, and leadership training. This integrated approach ensures that CME contributes to sustained professional growth and excellence in medical education, research, and patient care.
- t. **Record Keeping and Documentation:** The Office of Continuing Medical Education will maintain comprehensive records for each CME activity in accordance with ACCME and institutional record retention policies.

The documentation retained will include:

1. Activity planning file
2. Needs assessment
3. Learning objectives
4. Agenda
5. Speaker list
6. Disclosures
7. Content materials
8. Slide decks
9. Evaluation tool and summary of results
10. Evidence of disclosure to learners
11. Commercial support agreements and acknowledgments, if any
12. Attendance records, and
13. Credit award documentation.

Per the college's Records Retention Policy, CME activity files will be retained for ten (10) years. Attendance records via sign-in sheet or electronic check-in must record physician participation for credit reporting and will likewise be kept per policy for ten (10) years. This documentation serves to verify compliance in the event of ACCME audit or reaccreditation review.

- u. **Accreditation and Credit Designation Statements:** All promotional or program materials for the CME activity such as brochures, agendas, flyers, email announcements, or online listings must include the appropriate accreditation statement and credit designation statement as required by ACCME and the American Medical Association (AMA). All materials for an activity must be reviewed and approved by the Office of Continuing Medical Education prior to distribution to learners. "Save the Date" announcements may only include the following information:

- i. Title of Activity
- ii. Date of Activity
- iii. Venue (Virtual or Address)

- iv. Activity Sponsor
- v. Link for More Information

The Office of Continuing Medical Education will insert the appropriate accreditation and credit designation statement with the ACCME logo on the final promotional and educational materials upon approval of the activity and the material will be returned to the course director and activity coordinator for distribution and/or presentation. The disclosure slide for the presentation(s) will be completed by the Office of Continuing Medical Education and inserted as Slide 2 into the slide deck upon review and approval of the presentation. The appropriate accreditation and credit designation statement with the ACCME logo will be inserted at the bottom of the flyer and/or brochure and returned to the course director and activity coordinator for distribution.

**For directly provided activities:**

Tilman J. Fertitta Family College of Medicine is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians.

The Fertitta College of Medicine designates this live activity for a maximum of *X.XX AMA PRA Category 1 Credit(s)<sup>™</sup>*.

Physicians should claim only the credit commensurate with the extent of their participation in the activity.

**For jointly provided activities**, the joint providership accreditation statement must be used:

This activity has been planned and implemented in accordance with the accreditation requirements and policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint providership of Tilman J. Fertitta Family College of Medicine and [Name of Nonaccredited Provider].  
Tilman J. Fertitta Family College of Medicine is accredited by the ACCME to provide continuing medical education for physicians.

The Fertitta College of Medicine designates this live activity for a maximum of *X.XX AMA PRA Category 1 Credit(s)<sup>™</sup>*.

Physicians should claim only the credit commensurate with the extent of their participation in the activity.

Initial “save-the-date” announcements are to omit the accreditation statement if they have only preliminary information; however, any materials with specific details such as faculty names, learning objectives, etc., must include the accreditation statement and must have been approved by the Office of Continuing Medical Education. Additionally, disclosure of faculty relationships or lack thereof and acknowledgment of commercial support, if applicable, should be included in the syllabus or handout materials for the learners.

- v. **Learner Credit Claim and Certificate:** A system must be in place for learners to claim their CME credit and receive documentation. Learners are expected to attest to their participation by signing in, completing an online attestation or Claim for Credit form, and completing the activity evaluation. The Office of Continuing Medical Education will issue a certificate of attendance or credit indicating the number of *AMA PRA Category 1 Credits™* earned by request. Physicians should only claim credit commensurate with their participation. For live virtual activities, mechanisms such as Zoom or Teams attendance records are used to verify attendance of learners. For learners joining an activity virtually, it is the learner’s responsibility to ensure their full name and degree/credential(s) are clearly denoted. Proper virtual naming of learners and participants provides accurate recording of attendance and ensures CME credit is provided to the learner. “iPhone,” “iPad,” or learner initials will not receive CME credit. To receive CME credit, learners must attend the full duration of the live activity. Signing in and leaving before the conclusion of the session does not meet attendance requirements and will result in ineligibility for credit. Learners who attend an activity for less than half of an accredited activity will not receive credit. The Office of Continuing Medical Education is responsible for reporting accurate credit to ACCME PARS.
- w. **Compliance Review:** The Office of Continuing Medical Education will review each activity for compliance with ACCME Standards both during planning and after execution. Internally, the Office of Continuing Medical Education or the CME Committee may use checklists to ensure all required steps including disclosure collection, mitigation, content review, etc., were completed. Post-activity, any issues noted such as a participant reported bias or a required disclosure was initially overlooked, will be documented and remedied. The CME Program will include such findings in its overall monitoring and, if necessary, report any serious violations to ACCME as required by ACCME’s policies. Continuous quality improvement processes will be applied – e.g., providing feedback or additional training to activity planners or faculty if areas of non-compliance or improvement are identified.
- x. **Accessibility Accommodations:** All CME activities must be planned with reasonable accommodations to ensure accessibility for learners with disabilities. For in-person activities, venues must comply with ADA standards, and virtual platforms should offer features such as closed captioning or screen reader compatibility when feasible. Learners may request accommodation through the Office of Continuing Medical Education or the hosting department.

All efforts will be made to support full participation in compliance with federal, institutional, and accreditor guidelines.

Fulfilling all the above requirements, the college ensures that its live CME activities meet ACCME expectations and standards of excellence, thereby providing physicians with continuing education they can trust to be independent, relevant, and effective in improving their practice. All stakeholders must work collaboratively to uphold these standards throughout the CME activity lifecycle.

## V. Disciplinary Action for Non-Compliance

- A. **Accountability for compliance** is crucial. All individuals and entities involved in CME activities are expected to adhere to CME policies and applicable ACCME standards. Failure to comply with CME policies – whether in planning, implementation, or follow-up – undermines the integrity of the CME program and will be addressed promptly by the college. Consequences for violating this policy or ACCME requirements include:
- a. **Corrective Action Plans:** In cases of minor or first-time non-compliance, for instance, a required disclosure was unintentionally omitted from learner materials or a presenter's slides included a brand name/logo by mistake, the Office of Continuing Medical Education will notify the responsible individual(s) and require immediate correction. A corrective action may involve revising materials, notifying learners of a disclosure post-activity if one was missed, or other remedial steps. The incident will be documented, and the person may be required to undergo additional training in CME compliance.
  - b. **Withdrawal or Denial of CME Credit:** For more serious breaches, the college reserves the right to withhold or withdraw CME credit for an activity. For example, if it is discovered that an activity was planned or delivered with significant commercial bias or without proper disclosure and mitigation of a conflict, the Office of Continuing Medical Education, in consultation with the CME Committee and leadership, may determine that the activity cannot be designated for credit or that credit already awarded must be nullified. Learners would be informed if an activity's credit is revoked. An activity director or department that does not follow required procedures will have their CME activity approval rescinded before the event. The event may proceed; however, it continues without CME credit.
  - c. **Faculty/Planner Restriction:** Individuals who are found to have willfully violated the independence or content validity standards, for instance, a presenter who inserts promotional content into their talk or a planner who conceals a conflict of interest, may be suspended or removed from CME roles. The Office of Continuing Medical Education may prohibit such an individual from speaking or planning any CME activities under the college's auspices for a defined period or until they have completed remediation and demonstrated an understanding of compliance expectations. Repeat offenders or egregious cases where an individually knowingly allows a commercial sponsor to dictate content may be permanently disqualified from participation in the college's CME program.

- d. **Department/Activity Probation:** If a particular department repeatedly fails to comply with CME policies, for example, consistently late in material submission or inadequate planning documentation, multiple instances of bias, etc., the college may suspend the department's CME activities or place the department on probation. Suspension or probation may entail heightened monitoring of all the departments CME activities, a required meeting between department leadership and the Office of Continuing Medical Education, and temporary suspension of any new CME activity approvals for that department until compliance issues are resolved. Department chairs and faculty leadership will be involved in addressing systemic issues.
  - e. **Joint Providership Termination:** In jointly provided activities, if the non-accredited partner does not fulfill its obligations or violates ACCME standards the college will take action as outlined in the joint providership agreement. This may include issuing warnings, requiring immediate corrective measures, or ultimately terminating the joint providership arrangement. The college will withdraw from any jointly provided activity if the partner fails to comply with agreed-upon CME policies and procedures. This may result in cancellation of the CME credit for the activity or transfer of the activity solely under college control if feasible.
  - f. **Institutional Disciplinary Action:** Significant non-compliance that reflects ethical lapses such intentional misuse of commercial funds or falsification of documentation may be referred to college or university administration for further investigation under faculty/staff conduct policies. Such behavior may invoke actions per university Human Resources or Faculty Affairs policies independent of the CME context. Additionally, if any violation breaches University of Houston System policies such as those on conflict of interest or ethical conduct, it will be addressed in accordance with those broader policies.
  - g. **Accreditor Notification:** In line with ACCME's monitoring policy, the college's Office of Continuing Medical Education will report to the ACCME any required information about compliance incidents. If a pattern of non-compliance is identified, it will endanger the college's accreditation status with the ACCME. Therefore, all stakeholders are expected to cooperate fully in any internal reviews or ACCME inquiries. Our program's accreditation is a privilege and responsibility – significant failures to comply will be taken seriously by the college, the university and the ACCME.
- B. The Office of Continuing Medical Education will maintain documentation of all compliance infractions and the remedial or disciplinary actions taken. Records will be reviewed during policy reviews and ACCME accreditation cycles to ensure that the CME program is continuously improving and that corrective measures are effective. The goal of disciplinary action is not only to penalize non-compliance but to educate and prevent future occurrences, preserving the integrity and trust in our CME offerings.

## VI. References

- A. **University of Houston Manual of Administrative Policies and Procedures (MAPP) –**  
Relevant university policies including those on conflicts of interest and ethical conduct

(e.g., requirements for disclosure of outside interests and avoidance of conflicts as outlined in UH System policies).

- B. **University of Houston System Administrative Memoranda (SAM)** – SAM 02.A.08 “Outside Activities/Interests Disclosures” and SAM 02.A.29 “Ethical Conduct of Employees,” which govern faculty/staff obligations to disclose and manage conflicts of interest and commitment in alignment with state law and university policy.
- C. **Accreditation Council for Continuing Medical Education (ACCME) Standards for Integrity and Independence in Accredited Continuing Education (2020)** – The ACCME’s current standards that replaced the former Standards for Commercial Support, outlining requirements for content validity, independence from industry influence, identification and mitigation of conflicts of interest, management of commercial support, and separation of marketing from education [accme.org](https://www.accme.org)[cme.org](https://www.cme.org).

## VII. Review and Responsibility

Responsible Party: Director, Continuing Medical Education

Review: Every 2 years

Date Issued: 01/01/2023

Date Approved: 10/06/2025

Next Review Date: 10/06/2027

Responsible Office(s): Office of Continuing Medical Education

Fertitta College of Medicine

### *Revision and Approval History:*

*Dean’s Cabinet Approval Date* 10/06/2025

*Date Approved by CMEC:* 07/30/2025

*Revised to reflect current best practices in CME Operations* 03/01/2025