

Policy for Non-Compliance with Joint Providership Requirements

The Pennsylvania Medical Society's (PAMED) CME Advisory Panel's (CAP) has established the following policy and procedure for joint providers who do not comply with PAMED's Policy for providership and joint providership of a Category 1 continuing medical education activity. Please direct any questions regarding these policies to the Director of CME in the PAMED CME office at cmeadmin@pamedsoc.org.

Definitions

Accredited Provider – the institution or organization accredited by the ACCME or a state medical society to award Category 1 credit to a continuing medical education activity. In this case PAMED is the Accredited Provider.

Joint Provider – providership of a CME activity by two institutions or organizations when only one of the institutions or organizations is accredited. The accredited provider must take responsibility for a CME activity when it is presented in cooperation with a nonaccredited institution or organization and must use the appropriate accreditation statement. An ineligible company cannot take the role of nonaccredited entity in a joint providership relationship. Another commonly used term for a joint provider is an *Educational Partner*.

Procedure

1. All current and potential joint providers are supplied with PAMED's *Continuing Medical Education Reference Manual*. In addition, all new and potential joint providers are required to meet with PAMED staff to review the process for applying for and awarding *AMA PRA Category 1 Credit™* for an educational activity.
2. If at any time following the approval of an award of *AMA PRA Category 1 Credit™* and prior to the educational activity, a joint provider refuses to adhere to PAMED's policies and procedures, the CME staff should report this to the CAP members immediately and provide them with a mechanism to vote on whether to reverse the award of *AMA PRA Category 1 Credit™*.
3. If the joint provider fails to provide any required wrap-up materials to the CME Office within 90 days of the educational activity, staff will follow-up with a request in writing from the Chair of CAP. This letter will advise the joint sponsor that the CAP will not go forward with any future applications for Category 1 credit until all documentation from prior programs is submitted.
4. If a joint provider is habitually noncompliant and requires follow-up action for multiple activities, staff will report the noncompliance to the CAP at their next meeting; CAP will then decide on an appropriate course of action. Possible actions may include, but are not limited to:
 - a. Assess additional management and administrative fees over a specified period of time (i.e. one year) or until the entity successfully submits all required documentation for a specific number of activities.
 - b. Denial of all future requests for *AMA PRA Category 1 Credit™*.