



## **GUIDE TO THE PROCESS FOR NMA INITIAL CME ACCREDITATION**

### **I. Purpose of Accreditation**

- A. Accredited CME is an essential component of continuing physician professional development in the eyes of U.S. organizations of medicine. Nebraska Medical Association (NMA) accreditation is a mark of quality continuing medical education (CME) activities that are planned, implemented, and evaluated by the NMA in accordance with the Accreditation Council for Continuing Medical Education's (ACCME) Accreditation Criteria, Standards for Commercial Support, and policies (accreditation requirements). NMA accreditation assures the medical community and the public that such activities provide physicians with information that can assist them in maintaining or improving their practice of medicine, to help them bridge the gap between today's care and what care should be. In addition, accredited CME activities are free of commercial bias and based on valid content.

### **II. The ACCME and NMA**

- A. The ACCME is the organization that sets educational standards for CME activities and monitors its accredited providers' adherence to those standards. The ACCME accredits organizations and does not accredit individual activities. Organizations that are not accredited that would like to partner with an ACCME accredited provider in the provision of quality CME can enter into joint providership with an accredited organization.
- B. It is important to note that the ACCME does not reward the continuing educational accomplishments of individual physicians. Rather, those accomplishments are rewarded by other organizations which, for example, require physicians to complete a certain amount and/or type of CME for membership or re-licensure. As such, CME providers are not ACCME accredited for the purpose of granting credit. The requirements for granting credit are maintained by the other organizations themselves. Since different credentialing bodies have varying requirements, CME providers should be aware of the requirements of the particular credentialing body for which credit is being granted.
- C. The NMA is recognized by the ACCME as an accreditor of CME providers in Nebraska whose target audience is composed of no more than 30% of physician learners from outside Nebraska and its contiguous states. NMA's system of accreditation is equivalent to that of ACCME's national system of accreditation; therefore, there are many references to ACCME policies, especially in the Standards for Integrity and Independence, which are trademarked by the ACCME. Additional information about the ACCME, headquartered in Chicago, IL, can be found at [www.accme.org](http://www.accme.org).

### III. NMA's Expectations

- A. The NMA has several expectations of those who apply for NMA accreditation:
  - 1. Eligible organizations that decide to apply for accreditation should be prepared to both describe and furnish evidence that demonstrates compliance with the accreditation requirements. For this reason, organizations must plan, implement, and evaluate at least two CME activities within approximately 24 months prior to the submission of materials for initial accreditation.
  - 2. The NMA expects its accredited providers to monitor their overall CME program for compliance with the accreditation requirements and to fulfill annual reporting requirements.
  - 3. Payment of certain fees is required to obtain and maintain NMA accreditation. Please see the fee schedule for the Application for Accreditation fee.
  - 4. Annual CME Provider Fee: In subsequent years of accreditation, each accredited organization will be charged a pro-rated share of the costs incurred by the NMA in administering the intra-state CME accreditation process. For hospitals, this pro-ration is based upon the number of beds licensed by the State of Nebraska. For organizations other than hospitals, the pro-ration is based on a percentage of the total expenses.

### IV. Determining Your Eligibility

- A. Only certain organizations are eligible to receive NMA accreditation. The following criteria must be met before an organization will be considered. The organization must:
  - 1. Located in Nebraska.
  - 2. Develop and/or present a program of CME for physicians on a regular and recurring basis.
  - 3. Serve a target audience of no more than 30% of physician learners from outside Nebraska and its contiguous states. Organizations with a national audience should apply for accreditation from the ACCME.
  - 4. Not a commercial interest. Companies that are ineligible to be accredited are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Examples of such organizations include:
    - a. Advertising, marketing, or communication firms whose clients are ineligible companies.
    - b. Bio-medical startups that have begun a governmental regulatory approval process.
    - c. Compounding pharmacies that manufacture proprietary compounds.
    - d. Device manufacturers or distributors.
    - e. Diagnostic labs that sell proprietary products.
    - f. Growers, distributors, manufacturers or sellers of medical foods and dietary supplements.
    - g. Manufacturers of health-related wearable products.
    - h. Pharmaceutical companies or distributors.
    - i. Pharmacy benefit managers.
    - j. Reagent manufacturers or sellers.
  - 5. Not be developing and/or presenting a program of CME that is, in the judgment of NMA, devoted to advocacy on unscientific modalities of diagnosis or therapy.
  - 6. Present activities that have "valid" content. Specifically, the organization must be presenting activities that promote recommendations, treatment or manners of practicing medicine that are within the definition of CME. Providers are not eligible for

accreditation if they present activities that promote treatments that are known to have risks or dangers that outweigh the benefits or are known to be ineffective in the treatment of patients.

- B. A commercial interest is not eligible for NMA accreditation. Commercial interests cannot be accredited providers and cannot be joint sponsors. Within the context of this definition and limitation, the NMA considers the following types of organizations to be eligible to be accredited and whose mission and function are: (1) providing clinical services directly to patients; or (2) the education of healthcare professionals; or (3) serving as fiduciary to patients, the public, or population health; and other organizations that are not otherwise ineligible. Examples of such organizations include:
  - 1. Ambulatory procedure centers
  - 2. Blood banks
  - 3. Diagnostic labs that do not sell proprietary products
  - 4. Electronic health records companies
  - 5. Government or military agencies
  - 6. Group medical practices
  - 7. Health law firms
  - 8. Health profession membership organizations
  - 9. Hospitals or healthcare delivery systems
  - 10. Infusion centers
  - 11. Insurance or managed care companies
  - 12. Nursing homes
  - 13. Pharmacies that do not manufacture proprietary compounds
  - 14. Publishing or education companies
  - 15. Rehabilitation centers
  - 16. Schools of medicine or health science universities
  - 17. Software or game developers
- C. When there is a question regarding eligibility, the NMA reserves the right to make decisions on the issue and has a formal process in place to do so.

## **V. The Pre-Application Process**

- A. The purpose of the pre-application is to provide you with an opportunity to explain your eligibility for accreditation, as well as to demonstrate that your organization has mechanisms in place to fulfill ACCME's Accreditation Criteria and Policies when producing CME activities.
- B. For first-time, or initial applicants, at least two activities should be planned, implemented, and evaluated within approximately 24 months prior to submission of materials for initial accreditation.
- C. Once your organization has completed and submitted the pre-application for accreditation, the NMA reviews the pre-application materials to determine your organization's eligibility and to verify that your organization has mechanisms in place to meet NMA's requirements. However, the NMA does not review the materials to determine if your organization has complied with accreditation requirements. The NMA determines compliance based on three

data sources: the self-study report, performance-in-practice review, and accreditation interview. Therefore, if the NMA approves your pre-application, it is not a guarantee that your organization will receive Provisional Accreditation.

## **VI. Initial Accreditation Process**

- A. The initial accreditation process is an opportunity for each applicant to demonstrate that its practice of CME is in compliance with the accreditation requirements through three primary sources of data:
  - 1. Self-Study Report
  - 2. Performance-in-Practice Activity Review
  - 3. Accreditation Survey/Interview

## **VII. Self-Study Report**

- A. The self-study process provides an opportunity for your organization to reflect on its program of CME. This process can help your organization assess its commitment to and role in providing continuing medical education and determine its future direction.
- B. Initial applicants are asked to provide narrative descriptions, documents, and examples to present the practice(s) your organization utilizes to demonstrate that your CME program is in compliance with the Core Criteria, applicable Standards of Integrity and Independence, and applicable Accreditation Policies.
- C. Your organization may choose to submit narrative and evidence for the Commendation Criteria, but it is not required. The NMA will give a compliance finding and feedback for evidence submitted for these criteria, but these findings will not affect your organization's accreditation status, nor will they extend a provisional accreditation.

## **VIII. Performance-in-Practice Activity Review**

- A. Initial applicants are asked to demonstrate that your CME activities are in compliance with accreditation requirements using the NMA Performance-in-Practice Structured Abstract form. You will select two educational activities, completed within the last 24 months, for review. These activities may have been conducted in joint providership with an accredited provider or activities offered by the initial applicant without CME credit.
- B. Meeting minutes and strategic planning documents are two examples of materials that might help an organization show how an activity meets the NMA's expectations with evidence not directly related to a specific CME activity. It is important to note, in all cases, the evidence of performance-in-practice presented from these activities will be an important data source upon which the initial applicant's accreditation findings and decision will be based.

## **IX. Accreditation Survey/Interview**

- A. Initial applicants are presented with the opportunity to further describe the practices presented in the self-study report and activity files, and provide clarification as needed, in conversation with NMA surveyors.
- B. At the interview, the surveyors will seek clarification about any questions they may have regarding the self-study materials you submitted. You can expect the surveyors to: 1) conduct their interactions with organizations in a professional manner, 2) be familiar with your materials and the ACCME's Accreditation Criteria and Policies, and 3) communicate clearly and effectively without offering consultative advice or feedback regarding compliance or the expected outcome of the accreditation review.
- C. The NMA will contact via email to schedule the accreditation interview. Once a date and time has been set, your organization will be asked to confirm receipt of this communication.
  - 1. To ensure the validity of the process and based on circumstances and available resources, the NMA reserves the right to make all final decisions regarding the interview format, date, time, and/or composition of the survey team.

## **X. Decision-Making Process**

- A. The NMA's review and initial accreditation decision will be based on your organization's demonstration of compliance with the Commendation Criteria, and all applicable ACCME Accreditation Policies. Compliance with these criteria and applicable policies will lead to an accreditation outcome of Provisional Accreditation with a two-year accreditation term. However, if any of these criteria are found to be in noncompliance, the accreditation outcome will be nonaccreditation.
- B. Upon completion of the survey, the surveyors will provide a recommendation to the NMA's CME Committee, and a vote will be taken regarding the accreditation decision. This system of review provides the checks and balances necessary to ensure fair and accurate decisions. An accreditation decision letter will be sent to you following the Committee's decision.
- C. At the end of the two-year term of Provisional Accreditation, your organization would be eligible for reaccreditation. If successful in reaccreditation, your organization would be eligible for a status of either Accreditation (four-year term) or Accreditation with Commendation (six-year term).

## **XI. Expectations about Materials**

- A. Materials submitted must not contain any untrue statements, must not omit any necessary material facts, must not be misleading, must fairly present the organization, and are the property of the organization.
- B. Materials must not include individually identifiable health information, in accordance with the Health Insurance Portability and Accountability Act (HIPAA).

## **XII. Submitting Materials to the NMA**

- A. Self-Study Report
  - 1. Submit two copies of the Self-Study Report with a cover page that clearly identifies your organization by name. Use the full name of your organization as it is known to the NMA (no acronyms or abbreviations).
  - 2. The Self-Study Report must be organized using a divider system that follows the self-study outline.
  
- B. Performance-in-Practice Activity Files
  - 1. Provide information on the front cover that specifies:
    - a. Activity title.
    - b. Activity date.
    - c. Activity format.
  
- C. Do not ship original documents as they will not be returned. Retain a duplicate set of materials including for your own reference at any time during the accreditation process, but especially at the time of the accreditation interview. If the need arises, the NMA may ask for additional copies.
  
- D. Application fee per the fee schedule.

Send to:

Nebraska Medical Association  
Attn: CME Director  
1045 Lincoln Mall, Suite 200  
Lincoln, NE 68508