



**Administrative Policies and Procedures Manual
Continuing Medical Education – Honorarium
Policy**

VMC # 154.03

June 2, 2014

TO: SCVMC Employees

FROM: Paul E. Lorenz
Chief Executive Officer, SCVMC

SUBJECT: **Continuing Medical Education (CME)– Honorarium**

REFERENCES: HHS #578.0 Conflict of Interest; County Conflict of Interest Policy
Board of Supervisors # 5.16 Conflict of Interest and Disclosure Requirements,
154.02 Accreditation Council for Continuing Medical Education (ACCME)
Standards for Commercial Support

DEFINITIONS:

Commercial Support – an unconditional, unrestricted financial educational grant or in-kind donation given by a commercial interest, to support all or part of the costs of a CME activity.

Commercial Interest – any proprietary entity producing, marketing, re-selling, distributing or otherwise participating in or profiting from the distribution, promotion or sale of health care goods or services consumed by or used on patients. Providers of clinical services directly to patients are not commercial interests. A commercial interest is not eligible for accreditation by the ACCME. The ACCME considers the following types of organizations to be eligible for accreditation and free to control the content of CME:

1. 501-C Non-profit organizations (Note: ACCME screens 501c organizations for eligibility. Those that advocate for ‘commercial interests’ as a 501c organization are not eligible for accreditation in the ACCME system. They cannot serve in the role of joint sponsor, but they can be commercial supporters.)
2. Government organizations
3. Non-health care related companies
4. Liability insurance providers
5. Health insurance providers
6. Group medical practices
7. For-profit hospitals
8. For-profit rehabilitation centers
9. For-profit nursing homes
10. Blood banks
11. Diagnostic laboratories

Honorarium – A payment given to a professional person in consideration for a speech or presentation given at a CME activity for which fees are not legally required or prohibited.

Provider – Santa Clara Valley Medical Center (SCVMC) or other ACCME Accredited Organization.

POLICY:

- CME activities sponsored by SCVMC for which honoraria are paid must be compliant with all ACCME policies for accreditation, including the ACCME Standards for Commercial Support, and all applicable laws, regulations and policies.
- This honorarium policy operates in accordance with County, SCVHHS and SCVMC policies, including but not limited to, HHS #578.0 Conflict of Interest; County Conflict of Interest Policy Board of Supervisors # 5.16 Conflict of Interest and Disclosure Requirements Accreditation Council for Continuing Medical Education (ACCME) Standards for Commercial Support. ‘Santa Clara Valley Medical Center Administrative Policies and Procedures VMC 154.2
- No speaker at a CME activity sponsored by SCVMC may receive payment directly from Commercial Support sources or Commercial Interests for honoraria, travel or out-of-pocket expenses.
- No Santa Clara County employee may be paid honoraria, travel, lodging, registration fees or personal expenses from Commercial Support sources, Commercial Interests, the VMC Foundation, or any other third party.
- The Director of the activity, planning committee members, speakers, teachers or authors or any others involved with the supported activity content may not receive payment directly from Financial Support sources or Commercial Interests.
- All eligible payments will be made by VMC Foundation in accordance with this policy. No County funds will be used for payment of honoraria, travel or out of pocket expenses.
- CME course directors/chair and/or the planning committee will set the actual honorarium amount. Factors to be considered in setting an honorarium include:
 - The amount of time and effort required to prepare the presentation(s);
 - Whether the speaker is local or out of area;
 - The sub-specialty and/or qualifications of the speaker
 - Market rate of the standard amount of honoraria for the discipline
 - Available funding.

Suggested honorarium for category 1 (CME-Approved) activity sponsored by SCVMC include amounts ranging from: (regardless of the source of funding)

➤ **LOCAL INVITED SPEAKERS**

- \$500 to \$1000 per CME activity (plus travel, lodging, and reasonable out of pocket expenses consistent with the County’s Travel Policy)
- Any honorarium exceeding \$1000 (inclusive of travel, lodging and reasonable out of pocket expenses) will require approval by the SCVMC CME Committee and the President of Medical Staff, SCVMC

- NATIONAL/INTERNATIONAL INVITED SPEAKERS
 - \$1000 per CME activity, up to a maximum of \$5000 (plus travel, lodging, and reasonable out of pocket expenses consistent with the County’s Travel Policy)
 - Any honorarium exceeding \$1000 (inclusive of travel, lodging and reasonable out of pocket expenses) will require approval by the SCVMC CME Committee and the President of Medical Staff, SCVMC

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Signature approval on file.

Revised: