Policy: CME Program – Honoraria and Reimbursement

Purpose: This policy delineates the rules and regulations governing payment of honoraria and reimbursement of expenses by PNWU to PNWU CME program planners, teachers, and/or authors. The Accreditation Council for Continuing Medical Education (ACCME) Standard 3.7 states that as a CME provider, there must be “written policies and procedures governing honoraria and reimbursement of out-of-pocket expenses for planners, teachers and authors.” The intent of this standard is to ensure further separation of personal financial interests and commercial support from educational content. This policy provides guidance to staff, faculty and joint sponsors in order to comply with the ACCME’s Standards for Commercial Support of Continuing Medical Education.

Definitions: PNWU Office of University CME (OUCME) defines an honorarium as a payment, fee or other compensation received as a gratuity, award or honor, e.g. for delivering a speech, writing or authoring an article or publication.

Policy: PNWU’s OUCME acknowledges the valuable contributions made by CME program planners, teachers, and/or authors to the development and provision of CME activities. Because of this contribution, PNWU may provide payment of “reasonable” honoraria and reimbursement of “reasonable” out-of-pocket expenses for PNWU CME program planners, teachers, and/or authors for directly and jointly sponsored activities.

During CME activity planning, the Director of CME will discuss honoraria and reimbursement requirements with the planners, teachers, and/or authors. Considerations for determining honoraria amount include the party’s expertise and reputation, the number and length of presentations, content preparation, and travel time. The PNWU CME Committee Chair Person and the Director of CME will determine honoraria amounts with reference to the suggested hourly pay rates identified by the PNWU CME Committee as reasonable, not to exceed $2,500 per activity. These rates equal the approved payment amounts listed in the PNWU-COM Guest Lecturer Guidelines and are based on an individual’s credentials.

In compliance with the ACCME Standards for Commercial Support of CME, if an activity has commercial support, under no circumstances is the commercial interest allowed to pay directly for honoraria or additional reimbursements. Funds from commercial support may be used to cover appropriate expenses, such as travel, lodging, honoraria, or personal expenses for ‘bona fide’ employees and volunteers of the CME provider, joint provider or educational partner, so long as the following are met:

- Those funds must come through the OUCME, the joint sponsor, or the educational partner and cannot flow directly from the commercial supporter to the individual (ACCME Standard 3.12 Appropriate use of commercial support).
• Documentation of payment made through either the joint sponsor or the educational partner, when applicable, must be provided to the PNWU OUCME.

• The use of commercial support funds must adhere to the following policies and standards:
  • PNWU Policy: Disclosure of Industry Relationships and Secondary Employment
  • PNWU Policy: Pharmaceutical and Biomedical Device Industry Relationships
  • PNWU Policy: Gift Acceptance and Fundraising
  • PNWU CME Program Policy: Identifying and Resolving Conflicts of Interest in CME
  • PNWU CME Program Policy: Commercial Support
  • ACCME Standards of Commercial Support of CME

When approved, out-of-pocket, per diem, airfare, ground transportation, and other travel expenses (except travel time) will be paid in compliance with the PNWU spending policy governing business and travel reimbursement.

Procedure:
1. The OUCME confirms the PNWU CME program planners, teachers, and/or authors for each approved activity by extending an initial invitation.
2. Once confirmed, each party is notified if they will receive payment of honoraria and reimbursement of “reasonable” out-of-pocket expenses.
   a. CME activity presenters receive a formal invitation letter that delineates details of the activity, honorarium (if applicable), and relevant policies on disclosure, reimbursement, expenses, etc.
3. Prior to the CME activity, all planners, teachers, and/or authors must complete and return disclosure/conflict of interest forms to the OUCME.
4. At the conclusion of the CME activity, honoraria will be processed for the amount that was predetermined. If revisions to the originally agreed upon honorarium amount should be made, such revisions will be documented in the activity file.
5. Parties eligible for expense reimbursement must submit their original itemized receipts along with a completed PNWU Expense Form within 30 days after the activity. The Accounts Payable Department may take 2-3 weeks to process payment of funds.
6. Exceptions to this policy may be granted by the University President with supporting documentation provided to the OUCME.

Related Documents:
• PNWU Policy: Spending - Business and Travel
• PNWU Policy: Disclosure of Industry Relationships and Secondary Employment
• PNWU Policy: Pharmaceutical and Biomedical Device Industry Relationships
• PNWU Policy: Gift Acceptance and Fundraising
• PNWU-COM Guest Lecturer Guidelines
• PNWU CME Program Policy: Identifying and Resolving Conflicts of Interest in CME (in development)
• PNWU CME Program Policy: Commercial Support (in development)
• ACCME Standards of Commercial Support of CME

This policy and procedure are not to be construed as an employment agreement or contract.
Pacific Northwest University of Health Sciences retains the right to amend or change any policy or procedure at any time without prior notice.