

<b>Policy Title:</b>	<b>Honorarium Policy for Dartmouth Health Accredited Continuing Education (ACE) Activities</b>	<b>Policy ID:</b>	<b>8312</b>
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## I. Purpose of Policy

This document establishes the policy and procedures regarding the awarding of honoraria for teaching, speaking in, or planning an Accredited Continuing Education (ACE) activity that is either provided exclusively by Dartmouth Health or jointly provided.

Dartmouth Health’s Center for Learning and Professional Development (CLPD) adheres to the requirements set forth in *The Standards for Integrity and Independence in Accredited Continuing Education* of the Accreditation Council for Continuing Medical Education (ACCME). The aim is to provide consumers of ACE activities with scientifically rigorous and unbiased education in the best interests of our patients and the public.

## II. Policy Scope

The scope of this policy includes all employees, eligible individuals and trustees of Dartmouth Health as defined in Section III.

## III. Definitions

**Eligible Individuals:** For the purposes of this policy, an “eligible individual” is defined as a person who is not an employee of Dartmouth Health and is not active in its core Human Resource database with a compensation rate or benefit status and, therefore, is unable to be paid through the payroll system but is a “person of interest” to Dartmouth Health. Examples of eligible individuals: Dartmouth Health Trustees, Dartmouth College employees, including Geisel School of Medicine at Dartmouth staff and students when working at the Dartmouth Hitchcock Medical Center or Dartmouth Health funded position, travelers and/or volunteers assigned to any Dartmouth Health location.

**Fair Market Value:** Compensation for professional services negotiated between parties where both have reasonable knowledge, no undue pressure, and take into account the prevailing rates for comparable services in setting the remuneration.

**Honorarium:** An honorarium is an amount of money paid to an individual for services performed. This is a one-time payment for services, including, but not limited to, speakers, visiting lecturers or instructors.

Honorarium is further defined as a payment, from a tax-exempt or governmental organization, made to a person for services provided in a volunteer capacity for which fees are not traditionally required or where there is no official charge for services rendered (e.g., invited speaker at a professional society meeting). A payment for similar services by a profit-making entity is not considered an honorarium.

**Ineligible Company** – The ACCME defines an “ineligible company” as any entity whose primary business purpose is producing, marketing, selling, re-selling or distributing healthcare products used by or on patients, with the exemption of non-profit or government organizations and non-health care related companies.

**Employees:** For the purposes of this policy, “employees” includes all privileged health care practitioners, physicians, advanced practice providers, nurses, administrators, technicians, ancillary staff, administrative and support staff, individual independent contractors, and all other individuals, including employees whose services have been purchased/contracted by external parties, receiving compensation directly or indirectly from any Dartmouth Health entity, and others who may be identified.

**Trustee:** Individuals who serve on Dartmouth Health Board of Trustees.

#### IV. Policy Statement

- The decision to award an honorarium for teaching or speaking in or planning a Dartmouth Health ACE activity lies within the discretion of the approved Dartmouth Health Lead Planner, generally in consultation with the planning committee. To be an approved Lead Planner, a person must meet the following criteria:

A qualified CME Lead Planner must meet all of the following criteria:

1. be a physician, researcher, doctorally prepared professional who possesses an official, current or emeritus/a faculty appointment from the Geisel School of Medicine at Dartmouth;
2. be an employee in good standing of a Dartmouth Health Member Organizations, the VAMC, or the Geisel School of Medicine at Dartmouth;

A qualified CNE Lead Planner must meet the following criteria:

1. be an active member of the Nursing Continuing Education Council (NCEC),
2. be an employee in good standing of a Dartmouth Health Member Organizations.

A qualified Pharmacy Lead Planner must meet the following criteria:

1. be a pharmacist who is actively engaged in practice and holds a current license,
2. be an employee in good standing of a Dartmouth Health Member Organizations.

- The amount of an honorarium should represent current “fair market value.” The teacher’s, speaker’s, or planner’s background and experience, the range of honoraria appropriate for the profession and discipline, and other relevant facts shall be considered in determining the amount. The same fair market value shall apply to honoraria amounts awarded to teachers, speakers or planners who function as independent contractors.
- As a general rule, an honorarium is **not** provided for teaching in a Dartmouth Health ACE activity to:
  - An employee of the Dartmouth Hitchcock Clinic (DHC) or Mary Hitchcock Memorial Hospital (MHMH)

- Anyone credentialed and privileged by DHC or MHMH
  - A medical, nursing and other professional allied health student who works or studies at Dartmouth Health.
- Mechanisms exist such that an employee of DHC or MHMH, a person credentialed and privileged by DHC or MHMH, or a medical, nursing or other professional allied health student who works or studies at Dartmouth Health may receive an honorarium for his/her teaching in or planning a Dartmouth Health ACE activity, under special circumstances. For example, when the activity is unrelated to the responsibilities of the employee in their role at Dartmouth Health, they can be paid as an established independent contractor. This decision is based upon the approval of the Medical Director of IPCE/Associate Dean for CME, Vice President for CLPD, or the Director of CNE.
  - In any circumstance in which an honorarium is deemed appropriate and approved, payment and management must be in compliance with Dartmouth Health institutional policies and national standards pertaining to honoraria including the *Accreditation Council for Continuing Medical Education (ACCME) Standards for Integrity and Independence in Accredited Continuing Education*.
  - All money from an ineligible company for an ACE activity must be received and managed by a Dartmouth Health department or the CLPD. At no time may an honorarium be paid directly by an ineligible company to a planning committee member, speaker, author, or other individual in a position to control content in a Dartmouth Health ACE activity.

## V. References

*Joint Accreditation Criteria* – [Joint Accreditation Criteria](#) | [Joint Accreditation](#).

*ACCME Standards for Integrity and Independence in Accredited Continuing Education* – [Standards for Integrity and Independence in Accredited Continuing Education](#) | [ACCME](#)

<b>Responsible Owner:</b>	Center for Learning and Professional Development	<b>Contact(s):</b>	Dwayna Covey, Director CLPD
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<b>Related Policies &amp; Procedures:</b>	<a href="#">Conflict of Interest (COI) Consulting and Vendor Sponsored Activities Policy-D-H</a> <a href="#">Code of Ethical Conduct-D-H</a>		
<b>Related Job Aids:</b>			
<b>References/Evidence:</b>			



