

Departmental Policy Title	Honorarium for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy	ID	31276	
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Department	Center for Learning and Professional Development CLPD)			

#### 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

Accredited Continuing Education (ACE) Activity – An ACE Activity is an educational offering (e.g., Live Activity/Conference/Course/Symposium, Regularly Scheduled Series/Grand Rounds/Morbidity and Mortality/Case Conferences/Journal Clubs, Enduring Material/online learning activities) that is planned, implemented, and evaluated in accordance with the Joint Accreditation Criteria associated Dartmouth Health policies and protocols.<sup>1</sup>

ACCME Standards for Integrity and Independence in Accredited Continuing Education – The Accreditation Council for Continuing Medical Education (ACCME<sup>®</sup>) Standards for Integrity and Independence are the rules that ACE providers, including Dartmouth Health, must follow. The Standards are designed to ensure that accredited continuing education serves the needs of patients and the public; present learners with only accurate, balanced, scientifically justified recommendations; assure healthcare professionals and teams that they can trust accredited continuing education to help them deliver safe, effective, cost-effective, compassionate care that

is based on best practice and evidence; and create a clear, unbridgeable separation between accredited continuing education and marketing and sales.<sup>2</sup>

**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. This also includes medical, nursing and other professional allied health students who work or study at Dartmouth Health.

**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** – Any entity whose primary business is producing, marketing, selling, re-selling or distributing healthcare products used by or on patients.

**Employees** – For the purposes of this policy, "employees" includes all health care professionals, including 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 at a Dartmouth Health ACE activity lies within the discretion of the approved Dartmouth Health Lead Planner, generally in consultation with the planning committee. See Lead Planner Eligibility for a Dartmouth Health Accredited Continuing Education (ACE) Activity Policy and Roles and Responsibilities of Lead Planners, Coordinators, and Center for Learning and Professional Development Staff for Live Accredited Continuing Education (ACE) Activities.
- 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 Dartmouth Health.
- If a Dartmouth Health employee is ineligible, mechanisms exist to receive an honorarium 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 & Associate Dean for Interprofessional Educational Practice (IPEP), Vice President of CLPD, or the Director of ACE.

- 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.

## References

<sup>1</sup> Joint Accreditation Criteria – Joint Accreditation Criteria | Joint Accreditation.

<sup>2</sup> ACCME Standards for Integrity and Independence in Accredited Continuing Education – <u>Standards for</u> Integrity and Independence in Accredited Continuing Education | <u>ACCME</u>

<b>Responsible Owner:</b>	Center for Learning and Professional Development	Contact(s):	Melinda Potter	
Approved By:	Office of Policy Support (OPS); Covey, Dwayna; Vergo, Maxwell	Version:		
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Related Polices & Procedures:	<u>Conflict of Interest (COI) Consulting and Vendor Sponsored Activities Policy</u> <u>Code of Ethical Conduct-D-H</u> <u>Lead Planner Eligibility for a Dartmouth Health Accredited Continuing Education</u> (ACE) Activity Policy			
	Roles and Responsibilities of Lead Planners, Coordinators, and Center for Learning and Professional Development Staff for Live Accredited Continuing Education (ACE) Activities Job Aid			
<b>References/Evidence</b> :				