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 of Commercial Support, which are trademarked by the ACCME. Additional information about the ACCME, headquartered in Chicago, IL, can be found at 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 two years 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.
5. Annual CME Provider Fee: In subsequent years of accreditation, each accredited institution / 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-rataion is based upon the number of beds licensed by the State of Nebraska. For organizations other than hospitals, the pro-ratio is based on the number of physician attendees for programming presented during the previous calendar year.

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. Be located in Nebraska.
   2. Be developing and/or presenting 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 be a commercial interest. A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The NMA does not consider providers of clinical service directly to patients to be commercial interests.
   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 for accreditation and free to control the content of CME:
   1. 501c Non-profit organizations (Note: NMA screens 501c organizations for eligibility. Those that advocate for commercial interests as a 501c organization are not eligible for accreditation in the NMA system. They cannot serve in the role of joint sponsor, but they can be a commercial supporter)
   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
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 Essential Areas and Elements and Accreditation Policies (Accreditation Requirements) when producing CME activities.

   B. For first-time, or initial applicants, at least two CME 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. Initial applicants are asked to provide descriptions, attachments, and examples to give the reader an understanding of CME practice(s) related to the ACCME’s Accreditation Criteria, Standards for Commercial Support, and policies. Descriptions are narrative explanations. Attachments are specific documents. Examples are demonstrations of the implementation of the practices described that may include narrative and/or attachments.

   B. Your organization is expected to provide narrative and evidence for Criteria 1-3 and 7-12, and all applicable accreditation policies. Your organization may choose to submit narrative and evidence for Criteria 5, 6, 13, and 16-22, as well. 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.

   C. The content of the Self-Study Report must be organized using divider tabs according to the following outline:
      1. Prologue
      2. Purpose and Mission (C1)
      3. Educational Activities (C2-7 and Policies)
      4. CME Program and Educational Activities (C8-9)
      5. Content of Educational Activities (C10 and Content Validation)
      6. Evaluation and Improvement (C11-13)
      7. Engagement with the Environment (C16-22)
VIII. Performance-in-Practice Activity Review

A. Initial applicants are asked to verify that their CME activities are in compliance with accreditation requirements using the NMA Performance-in-Practice Structured Abstract form. The initial applicant 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 may be 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. The NMA utilizes face-to-face meetings as its standard accreditation interview format; however, other interview formats are available, including conference call, or via video conference. Interviews typically average 90 minutes in length.
   2. 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 Criteria 1-3 and 7-12, 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 (NMACME). 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. Accreditation decision letters are sent to organizations following the NMACME’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 hard copies of the Self-Study Report in a three-ring binder. The binder covers should clearly identify 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 divider tabs as specified.
3. The Self-Study Report must be typed with at least 1" margins (top, bottom and sides), using 11-point type or larger; double-sided printing is acceptable.

B. Performance-in-Practice Activity Files
1. Submit labeled evidence for each activity in an 8 1/2" by 11" file folder; do NOT submit evidence in binders.
2. Affix a label on the front cover of each file folder that specifies:
   a. Full name of your organization (no acronyms or abbreviations)
   b. Activity title.
   c. Activity date.

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.

Send to:
Nebraska Medical Association
Attn: CME Director
233 13th Street, Suite 1200
Lincoln, NE 68508