



GUIDE TO THE PROGRESS REPORT PROCESS: DEMONSTRATING IMPROVEMENTS AND COMPLIANCE

A. Overview of the Progress Report Process

The NMA expects providers found to be in noncompliance with Core Accreditation Criteria (formerly 1-13) and/or applicable Standards for Integrity and Independence in Accredited Continuing Education and/or applicable Accreditation Policies to demonstrate compliance through the progress report process. Please refer to your recent NMA decision report for the descriptions of the specific performance issues that must be addressed in the progress report. Noncompliance findings in the Menu of Commendation Criteria should NOT be addressed in the progress report.

B. Contents of a Progress Report

For the specific performance issues described for noncompliance findings, providers must:

1. describe improvements and their implementation; and,
2. provide evidence of performance-in-practice to demonstrate compliance.

C. Expectations of Materials Submitted

All the materials submitted to the NMA 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. Materials submitted for accreditation (progress report, evidence of performance-in-practice, other materials) must not include individually identifiable health information, in accordance with the Health Insurance Portability and Accountability Act (HIPAA).

D. Decision Making

Providers will receive a decision from the NMA based on a review of all of the information and materials submitted as part of your progress report. A progress report review will result in the following feedback from the NMA:

1. All Criteria in Compliance: The provider demonstrated that it has corrected the criteria or policies that were found to be in noncompliance.
2. All Criteria Not Yet in Compliance: The provider has not yet demonstrated that it has corrected all of the criteria or policies that were found to be in noncompliance.

If all criteria or policies that were found to be in noncompliance are not corrected, the NMA may require another progress report, a focused interview, and/or a change of status may result. There may be circumstances when the NMA requires clarification at the time of the provider's next review to verify compliance, because, for example, a provider has not had sufficient time within the context of its CME program to implement improvements or to produce evidence to support compliance.

E. Format Requirements

1. Your progress report narrative should describe improvements made in areas of noncompliance. Provide concise narrative descriptions of policies, processes, and practices that support compliance with NMA requirements.
2. The information in the table below, provides a guide for determining the structure and content of the progress report to address noncompliance findings with Core Accreditation Criteria and/or applicable Standards for Integrity and Independence in Accredited Continuing Education and/or applicable Accreditation Policies. Responses should be developed in the context of the specific performance issue(s) identified in the decision report from your recent review.

CORE ACCREDITATION CRITERIA	
CME Mission and Program Improvement	
Area	Required for Progress Report
Mission	<i>In the Progress Report Narrative:</i> 1. Describe the expected results component of your CME mission statement. The expected results must be articulated in terms of competence, performance, or patient outcomes.
Program Analysis	<i>In the Progress Report Narrative:</i> 1. Describe your conclusions on the degree to which you have met the expected results of your mission. These conclusions should be based on the data you have obtained in your analysis of learner change across your overall program of accredited activities. <i>In the Analyzes Change section of EACH Progress Report Performance-in-Practice Structured Abstract:</i> 2. Describe the strategies used to obtain data or information about changes achieved in learners' competence or performance or patient outcomes as a result of their participation in this activity, including, for example, questions you asked the learner about changes in competence or performance or other change data such as quality improvement or patient outcomes. 3. Provide the compiled or summative data or information generated from the activity about changes achieved in learners' competence or performance or patient outcomes.
Program Improvements	<i>In the Progress Report Narrative:</i> 1. Describe the needed or desired changes in the overall program required to improve on your ability to meet your CME mission that have been identified, planned, and implemented during the accreditation term.
Educational Planning and Evaluation	
Area	Required for Progress Report
Educational	<i>In the Progress Report Narrative:</i>

Needs	<ol style="list-style-type: none"> 1. Describe how your organization identifies the professional practice gaps of your learners and the educational needs that underlie the practice gaps. <p><i>In the Educational Needs section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 2. State the professional practice gap(s) of your learners on which the activity was based. 3. Check the educational need(s) that apply: knowledge; competence; performance. 4. State the educational need(s) that you determined to be the cause of the professional practice gap(s).
Designed to Change	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> 1. Describe how your organization designs activities to change the competence, performance, or patient outcomes of your learners. <p><i>In the Designed to Change section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 2. Explain what competence, performance, or patient outcome this activity was designed to change.
Appropriate Formats	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> 1. Explain the basis for determining that the formats you choose are appropriate for the setting, objectives, and desired results of your activities. <p><i>In the Appropriate Formats section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 2. Explain why this educational format is appropriate for the activity.
Competencies	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> 1. Describe how your activities/educational interventions are developed in the context of desirable physician attributes. <p><i>In the Competencies section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 2. Select the desirable physician attribute(s) this activity addresses. The list below includes the Competencies of: ACGME/ABMS, Institute of Medicine, and Interprofessional Education Collaborative, or you may enter other competencies recognized by your organization.
Analyzes Change	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> 1. Describe the strategies you use to obtain data on change in learners' competence, performance or patient outcomes and your conclusions as to whether or not you were able to change learner competence, performance or patient outcomes across your overall program of accredited activities. <p><i>In the Analyzes Change section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p>

	<ol style="list-style-type: none"> Describe the strategies used to obtain data or information about changes achieved in learners' competence or performance or patient outcomes as a result of their participation in this activity, including, for example, questions you asked the learner about changes in competence or performance or other change data such as quality improvement or patient outcomes. Provide the compiled or summative data or information generated from the activity about changes achieved in learners' competence or performance or patient outcomes.
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Accreditation Policies

Area	Required for Progress Report
Accreditation Statement Policy	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> Describe what you do to ensure that your CME activities meet the requirements of the Accreditation Statement Policy. <p><i>In the Accreditation Statement Policy section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> Include evidence of the use of the appropriate accreditation statement for the activity, as presented to learners.
Attendance Records Retention Policy	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> Describe the mechanism your organization uses to record and verify physician participation for six years from the date of your CME activities. Provide an example of the information or report(s) your mechanism can produce for an individual participant.
Activity Records Retention Policy	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> Describe the improvements you have identified and the timeline for implementation to ensure that your organization retains activity files/records of CME activity planning and presentation during the current accreditation term or for the last twelve months, whichever is longer. <p><i>In the CME Attendance Records Retention Policy section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> As applicable, produce the activity files/records of CME planning and presentation as requested for any noncompliance findings being addressed in the progress report.

Standards for Integrity and Independence

Area	Required for Progress Report
Standard 1: Ensure Content Is Valid	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> Describe what you do to ensure that the content of your CME activities and your accredited CME program meet all four elements of Standard 1. <p><i>In the Standard 1 section of EACH Progress Report Performance-in-Practice</i></p>

	<p><i>Structured Abstract:</i></p> <ol style="list-style-type: none"> 2. Provide the required documentation described based on the type of the activity. <ol style="list-style-type: none"> a. If the activity is an Internet, Journal-Based or Enduring Material CME activity: Include the CME product itself, so reviewers may experience the activity as your learners experience it. With your documentation, provide a URL/link to the activity and generic login(s) and password(s), if necessary for access. The product must be available for review from the point of submission through the end of your current accreditation term. If internet activities are no longer available online, you may provide access to an archived website. If this is not an option, then screen shots are acceptable. b. If the activity is a Regularly Scheduled Series (RSS): provide a listing of the dates, faculty, location, and topics of each session. c. If the activity is any other type of activity: provide the activity topics/content, e.g., agenda, brochure, program book, or announcement. The documentation must include the nature and the scope of the content of the CME activity.
Standard 2: Prevent Commercial Bias & Marketing in Accredited CME	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> 1. Describe what you do to ensure that the content of accredited activities and your accredited CME program meet expectations of elements 1 AND 2 of Standard 2. 2. Describe what you do to ensure that names are not shared without the explicit consent of learners. <p><i>In the Standard 2 section of the EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 3. Attest that the activity meets the expectations of all three elements of Standard 2. <p><i>In the Standard 1 section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 4. Provide the required documentation described based on the type of the activity. <ol style="list-style-type: none"> a. If the activity is an Internet, Journal-Based or Enduring Material CME activity: Include the CME product itself, so reviewers may experience the activity as your learners experience it. With your documentation, provide a URL/link to the activity and generic login(s) and password(s), if necessary for access. The product must be available for review from the point of submission through the end of your current accreditation term. If internet activities are no longer available online, you may provide access to an archived website. If this is not an option, then screen shots are acceptable. b. If the activity is a Regularly Scheduled Series (RSS): provide a listing of the dates, faculty, location, and topics of each session. c. If the activity is any other type of activity: provide the activity topics/content, e.g., agenda, brochure, program book, or announcement. The

	documentation must include the nature and the scope of the content of the CME activity.
Standard 3: Identify, Mitigate, and Disclose Relevant Financial Relationships	<p><i>In the Progress Report Narrative:</i></p> <ol style="list-style-type: none"> 1. Describe the process(es) you have in place to collect information from all planners, faculty, and others in control of educational content about all financial relationships with ineligible companies. 2. Provide a single example of each of the form(s) or mechanism(s) that you use to collect information that meets the expectations of Standard 3.1. Ensure that this/these mechanism(s) include: <ol style="list-style-type: none"> a. the complete definition of an ineligible company b. the individual completing the form/mechanism is instructed to include ALL financial relationships with ineligible companies for the prior 24 months. 3. Indicate if your organization uses employees or owners of ineligible companies in its accredited activities. (Yes/No) <ol style="list-style-type: none"> a. If YES: Describe what you do to meet the expectations of Standard 3.2 (a-c). 4. Describe the process(es) you use to determine which financial relationships are relevant to the educational content. 5. Describe the method(s) you use to mitigate all relevant financial relationships appropriate to the role(s) of individuals in control of content. Note that the method(s) used for planners are likely different than those used for faculty. 6. Describe the method(s) you use to inform learners of the presence or absence of relevant financial relationships of all individuals in control of content. 7. Describe the method(s) you use to inform learners that all relevant financial relationships have been mitigated. <p><i>In the Standard 3 section of the EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <ol style="list-style-type: none"> 8. Did this activity meet one of the exceptions listed below? (Yes/No) <ol style="list-style-type: none"> a. Accredited education that is non-clinical, such as leadership or communication skills training. b. Accredited education where the learner group is in control of content, such as a spontaneous case conversation among peers. c. Accredited self-directed education where the learner controls their educational goals and reports on changes that resulted, such as learning from teaching, remediation, or a personal development plan. When accredited providers serve as a source of information for the self-directed learner, they should direct learners only to resources and methods for learning that are not controlled by

	<p>ineligible companies.</p> <p>d. If YES: describe how the activity met the exception.</p> <p>9. Did owner(s)/employee(s) of ineligible companies participate as planners or faculty in this activity? (Yes/No)</p> <p>a. If YES: describe which of the three situations listed in Standard 3.2 was applicable to their participation as planners or faculty.</p> <p>10. Did an ineligible company take the role of non-accredited partner in a joint provider relationship in this activity? (Yes/No)</p> <p>11. Provide a single completed example of the form(s), tool(s), or mechanism(s) used to collect information from all planners, faculty, and others in control of the educational content of this activity about their financial relationships with ineligible companies.</p> <p>12. Provide the information, as disclosed to learners, about the presence or absence of relevant financial relationships for all individuals in control of CME content, if applicable. Also, if applicable, provide the statement, as disclosed to learners, that all relevant financial relationships were mitigated.</p> <p><i>In the Standard 1 section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <p>13. Provide the required documentation described based on the type of the activity.</p> <p>a. If the activity is an Internet, Journal-Based or Enduring Material CME activity: Include the CME product itself, so reviewers may experience the activity as your learners experience it. With your documentation, provide a URL/link to the activity and generic login(s) and password(s), if necessary for access. The product must be available for review from the point of submission through the end of your current accreditation term. If internet activities are no longer available online, you may provide access to an archived website. If this is not an option, then screen shots are acceptable.</p> <p>b. If the activity is a Regularly Scheduled Series (RSS): provide a listing of the dates, faculty, location, and topics of each session.</p> <p>c. If the activity is any other type of activity: provide the activity topics/content, e.g., agenda, brochure, program book, or announcement. The documentation must include the nature and the scope of the content of the CME activity.</p>
Standard 4: Manage Commercial Support	<p><i>In the Progress Report Narrative:</i></p> <p>1. Indicate if your organization accepts commercial support. (Yes/No)</p> <p>a. If YES: Describe what you do to meet the expectations of all four elements of Standard 4.</p> <p><i>In the Standard 4 section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p>

	<p>2. Indicate if the activity received commercial support. (Yes/No)</p> <ol style="list-style-type: none"> If YES ... Provide a list of the name(s) of the commercial supporter(s) of the activity and the dollar value of any monetary commercial support and/or indicate non-monetary (in-kind) support. Include each executed commercial support (monetary and non-monetary) agreement for the activity. <p>3. Provide the information for disclosure of commercial support (monetary and non-monetary), as presented to learners.</p> <p><i>In the Standard 1 section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <p>4. Provide the required documentation described based on the type of the activity.</p> <ol style="list-style-type: none"> If the activity is an Internet, Journal-Based or Enduring Material CME activity: Include the CME product itself, so reviewers may experience the activity as your learners experience it. With your documentation, provide a URL/link to the activity and generic login(s) and password(s), if necessary for access. The product must be available for review from the point of submission through the end of your current accreditation term. If internet activities are no longer available online, you may provide access to an archived website. If this is not an option, then screen shots are acceptable. If the activity is a Regularly Scheduled Series (RSS): provide a listing of the dates, faculty, location, and topics of each session. If the activity is any other type of activity: provide the activity topics/content, e.g., agenda, brochure, program book, or announcement. The documentation must include the nature and the scope of the content of the CME activity.
<p>Standard 5: Manage Ancillary Activities Offered in Conjunction with Accredited Continuing Education</p>	<p><i>In the Progress Report Narrative:</i></p> <p>1. Indicate if your organization offers ancillary activities, including advertising, sales, exhibits, or promotion for ineligible companies and/or nonaccredited education in conjunction with your accredited CE activities? (Yes/No)</p> <ol style="list-style-type: none"> If YES: Describe what you do to meet expectations of all three elements of Standard 5. <p><i>In the Standard 1 section of EACH Progress Report Performance-in-Practice Structured Abstract:</i></p> <p>2. Provide the required documentation described based on the type of the activity.</p> <ol style="list-style-type: none"> If the activity is an Internet, Journal-Based or Enduring Material CME activity: Include the CME product itself, so reviewers may experience the activity as your learners experience it. With your documentation, provide a URL/link to the activity and generic login(s) and password(s), if necessary for access. The product must be available for review from the point of submission through

	<p>the end of your current accreditation term. If internet activities are no longer available online, you may provide access to an archived website. If this is not an option, then screen shots are acceptable.</p> <p>b. If the activity is a Regularly Scheduled Series (RSS): provide a listing of the dates, faculty, location, and topics of each session.</p> <p>c. If the activity is any other type of activity: provide the activity topics/content, e.g., agenda, brochure, program book, or announcement. The documentation must include the nature and the scope of the content of the CME activity.</p>
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F. Submission Instructions

- Materials must be submitted by the established deadlines. Failure to do so may result in a delay of your progress report review and/or a change of your organization's accreditation status.
 - Be sure to include evidence of performance-in-practice for each activity selected, as applicable.
 - Place a label on the front of each activity file folder that includes: full name of your organization; activity title; activity date; activity type; if activity was directly or jointly provided; and whether the activity accepted commercial support. Example:

(ORGANIZATION NAME) Title of Activity Date of Activity Type of Activity Direct or Joint Providership Commercial Support Yes/No

- Do NOT send original documents, because the materials will not be returned to you. Submit two hard copies of the progress report and supporting documents to:

Nebraska Medical Association
 CME Director
 1045 Lincoln Mall, Suite 200
 Lincoln, NE 68508