

# The Good, The Bad, and The Ugly of Continuing Education



**CONTINUING EDUCATION PROVIDER WORKSHOP  
CPME CONTINUING EDUCATION COMMITTEE  
2<sup>ND</sup> ANNUAL PODIATRIC MEETING PLANNERS  
SUMMIT**



# The Good, The Bad, and The Ugly of Continuing Education



- No commercial interest provided financial support for this continuing education activity.

The following contributors have no relevant financial relationships with commercial interests to disclose:

- Rodney Peele, JD; Chair Continuing Education Committee, Council member
- Alyssa Stephenson, DPM; Continuing Education Committee, Council member
- Sandy Saylor – CPME Associate Director

# The Ugly - Forms



- Joint provider agreement (requirement 1.6)
- Commercial support agreement (6.1)
- Financial disclosure form (5.3)
- Evaluation form (4.1)

# The Ugly - Forms



- Joint Provider – collaborative educational undertaking between an approved provider and an another organization (approved or unapproved)
  - ❖ Signed joint provider agreement (1.6) shall be established to delineate the specific responsibilities of the provider and the organization.
    - Activity information (title, date, location)
    - Name of the joint provider and representative
    - Description of services
    - Role of the approved provider
    - Disclosure of financial interest and off label use
    - Commercial support
    - Continuing education approval statement

# The Ugly - Forms



- Educational activity evaluation
- Compensation
- Termination
- Joint provider responsibilities before and after the activity
- Information to be submitted to the provider before the activity
- Information to be submitted to the provider after the activity

# The Ugly - Forms



- Commercial Support – monetary or in-kind contributions given by a commercial interest for the continuing education activity.
  - A commercial interest cannot take the role of a non-approved provider in a joint provider relationship.
  - The funds received from a commercial interest must be unrestricted, **if not no** continuing education contact hours (CECH) can be awarded.
  - The funds received from a commercial interest must be made payable to the provider of the joint provider.
  - Identification of commercial interest providing financial support must be identified in the final activity publication. If none, that must be identified also.
  - All financial relationships with commercial interests must be disclosed to the learners.

# The Ugly - Forms



- ❖ Signed commercial support written agreement (6.1) between the provider and each commercial interest must include the following:
  - Name of the provider, joint provider (if applicable), commercial interest, amount of the unrestricted grant and/or in-kind support
  - Title, date(s), and location of the continuing education activity
  - Printed names, and dated, authorized signatures
  - Confirmation that the provider is solely responsible for the design and the educational content of the activity, production of the educational and audiovisual materials, and selection of all instructors
  - Confirmation that the provider ensures the separation of commercial exhibits or activities from the activity
  - Confirmation that the provider exercises full control in managing unrestricted funds provided by the commercial interest

# The Ugly - Forms



- Financial Disclosure – the reporting of relevant financial relationships with commercial interests
  - ❖ The provider is encouraged to explore a wide variety of sources to select qualified instructors. Instructors must:
    - have expertise and demonstrated competence in the appropriate subject area;
    - possess demonstrated teaching ability to communicate effectively with professional colleagues;
    - be familiar with a sufficient repertoire of instructional strategies to achieve the intended outcomes of the continuing education activity;
    - understand the principals and methods of adult education; and
    - be made aware of the specific learning objectives, design, and educational methods of the continuing education activity.



# The Ugly - Forms



- ❖ Signed financial disclosure agreement (5.3) for each educational activity from ALL individuals responsible for, or, who have influence over, the content of the activity (e.g., planning committee, instructors, members, content authors).
  - Name of the individual
  - Name of the commercial interest(s)
  - Nature of the relationship the individual has with each commercial interest
  - Absence of a relevant financial relationship(s) if applicable

# The Ugly - Forms



- Evaluation – measurement tool used to assess and determine the effectiveness of the continuing education activity
  - ❖ The evaluation (4.1) must request learners to assess areas including, but not limited to, the following:
    - Educational content (comprehensive, appropriate, and adequately in-depth to meet the stated objectives)
    - Methods by which the activity enhances professional competence, performance, and patient outcomes
    - Quality of the instructional process and presentations including the effectiveness of educational methods and teaching materials
    - Individual instructor quality, effectiveness, and presence of commercial bias
    - Adequacy of facilities and resources
    - Overall management of the activity
    - Identification of professional needs or interest for future activities

# The Ugly - Forms



- ▣ At the conclusion of the continuing education activity, the provider shall assess the effectiveness of the continuing education activity in meeting the learning objectives in terms of improving strategies, skills, and/or patient care. This assessment may be achieved through a variety of methods including pre-and–post-test, pre-and-post-audience response polling, post-activity evaluation, learner interview, etc.
- ▣ Evaluation and/or assessment summaries must be reported to appropriate administrative and planning staffs and **instructors**.
- ▣ Describe how the evaluation and/or assessment summaries are reported to appropriate administrative and planning staffs and **instructors**.

# The Bad – Additional Paperwork



- Conflict of interest policy (requirement 5.2)
- Final activity publication (7.1)
- Roster (7.5)
- Certificate (7.6)

# The Bad – Additional Paperwork



- Conflict of Interest – when an individual or organization has an opportunity to affect the content of educational activities regarding products or services in which they have a financial relationship.
- The provider must implement a documented mechanism for the identification and resolution of all known conflicts of interest prior to the delivery of the educational activity.
  - ❖ Conflict of Interest Policy (5.2) is to ensure that any potential conflict will be identified openly so that the activity participants may form their own judgments about the presentation following the full disclosure of facts

# The Bad – Additional Paperwork



- ❖ Methods to resolve conflicts of interests include but are not limited to the following:
  - Peer review of presentation materials to ensure balance and unbiased content
  - Recusal of the conflicted person from planning or presenting
  - Divestiture of the financial relationship
  
- ❖ If the identified COI cannot be resolved –
  - Non-speaker – has an identified COI he/she will be asked to recuse themselves from any discussion/decision making process associated with COI.
  - If no disclosure form is received that person will be disqualified and cannot have control of or responsibility for the development, management, or evaluation of the activity

# The Bad – Additional Paperwork



- ❖ If the identified COI cannot be resolved –
  - Speaker - has an identified COI, resolution methods may include, but not be limited to, one or more of the following:
    - Peer review of content prior to the activity to ensure balance and unbiased content. The activity faculty or authors must be responsive to revision requirements
    - Assigning a different topic for the individual
    - Assigning a different faculty/author for a topic
    - Recusal /Cancellation of the faculty/author
    - Divestiture of the financial relationship
  - If a speaker refuses to disclose they must be replaced and not considered to present until a disclosure is received
- Resolution of the COI must be disclosed to the audience in advance

# The Bad – Additional Paperwork



- Final activity publication

- ❖ The following information must be published in the final activity publication (7.1):

- Title
- Learning objectives
- Detailed hourly agenda
- Intended audience, including any prerequisite levels of skill, knowledge, or experience required of learners if applicable
- Costs to the learner (activity is identified as complimentary if there is no charge)
- Contact information (phone and/or e-mail address)
- List of instructors and professional degree(s)
- Learner refund and activity cancellation policy
- Identification of joint provider



# The Bad – Additional Paperwork



- Final activity publication – continued
  - Identification of commercial interests providing financial support. If none, the following statement must be used:  
  
“No commercial interest provided financial support for this continuing education activity.”
  - location(s), date(s), and times(s)
  - Approval status of the provider and the number of continuing education contact hours to be awarded

# The Bad – Additional Paperwork



- Final activity publication - continued
  - ❖ Approval statement approved providers must use:
    - (Name of provider) is approved by the Council on Podiatric Medical Education as a provider of continuing education in podiatric medicine. (Name of provider) has approved this activity for a maximum of \_\_\_\_ continuing education contact hours.
  - ❖ Approval statement joint approved providers must use:
    - This activity has been planned and implemented in accordance with the standards and requirements for approval of providers of continuing education in podiatric medicine through a joint provider agreement between (name of provider) and (name of non-approved provider). (Name of provider) is approved by the Council on Podiatric Medical Education as a provider of continuing education in podiatric medicine. (Name of provider) has approved this activity for a maximum of \_\_\_\_ continuing education contact hours.

# The Bad – Additional Paperwork



## ● Roster

- ❖ The provider shall maintain a roster (7.5) of individuals participating in each continuing education activity. The roster must include the following information:
  - Name of provider
  - Title of activity
  - Maximum continuing education contact hours available
  - Date(s) of activity
  - Names of individual learners
  - Number of continuing education contact hours awarded each learner



# The Bad – Additional Paperwork



## ● Certificate

- ❖ The provider shall provide a documented record (7.6) of attendance to each learner upon satisfactory completion of the continuing education activity. The documented record of attendance must include the following information:
  - Name of provider
  - Title of activity
  - Date(s) of activity
  - City/State
  - Name of learner
  - Number of continuing education contact hours awarded each learner
  - Approval statement

# The Bad – Additional Paperwork



*(Name of approved provider)*  
*Continuing Education Activity*  
awarded to:

**Name of Learner**

for receiving number of CECH awarded to learner Continuing Education Contact Hours for participation in (title of activity), (date of activity) at the (location City/State of activity)

**(Name of approved provider) is approved by the Council on Podiatric Medical Education as a provider of continuing education in podiatric medicine. (Name of approved provider) has approved this activity for a maximum of \_\_\_\_ continuing education contact hours.**

\_\_\_\_\_  
Continuing Education Administrator

\_\_\_\_\_  
Continuing Education Director

\_\_\_\_\_  
Date certificate issued

# The Good



- Mission Statement (requirement 1.1)
- Learning Objectives (3.1)
- Educational Methods (3.2)
- Needs Assessment (2.1)
- Self-Assessment (4.2)
- Patient Protection (8.1)
- HIPAA (8.2)
- Instructional Media (Standard 9; requirements 9.1 – 9.8)

# The Good



- Mission Statement - broad, long-range goals, expectations, and purposes of the provider in delivering continuing education.
  - ❖ The continuing education mission statement (1.1) must:
    - include the type of activities provided;
    - describe the expected results of the overall program;
    - describe the scope and nature of the provider's continuing education activities;
    - identify the target audience; and
    - relate to the health care needs of the public and/or the educational needs and interest of the podiatric medical professional.



# The Good



- Learning Objectives (3.1) - written, measurable statements indicating what the learner is expected to accomplish by expressing specific, short-range outcomes. Objectives are stated in behavioral or action-oriented terms.
- Educational Methods (3.2) – the systematic plan or procedure by which information or educational materials is made available to the learner. Examples include lectures, discussions, grand rounds, case reviews and presentations, question and answer periods, laboratory work, workshops, discussion groups, self-instruction, and Internet-based or other electronically-mediated formats.

# The Good



- Needs Assessment - the process of identifying specific information or skills directly benefiting or of interest to learners, based on information provided by prospective learners and/or objective sources. The specific needs provide the rationale and focus for the educational activity.
- ❖ Needs assessment (2.1) must be:
  - Conducted at least annually and documented in some written format:
    - committee minutes
    - report to the committee
    - PowerPoint presentation

# The Good



- Identified from multiple data sources – at least one method from each of the data sources below
  - Learners Data Sources
    - A committee representing a cross section of the prospective audience
    - Surveys of prospective learners and/or experts
    - Analysis of learner’s post-assessment results and activity evaluations from previous continuing education activities
  - Scientific Data Sources
    - Review of epidemiological data
    - Patient care outcomes, morbidity and mortality data, etc.
    - Searches of current literature including that available through national repositories of relevant medical and health information
    - Consensus of experts
    - Regional census information
    - Hospital quality data

# The Good



- Self-Assessment (4.2) - data and observations collected by the provider to document its accomplishments assess areas where improvements may be necessary, and outline a plan for making those improvements. The annual self-assessment must include the following items:
  - Identification of individuals involved
  - An analysis of the mission statement
  - The extent to which the mission statement is being achieved through its continuing education activities
  - How effectively evaluation data from individual continuing education activities are used in planning future continuing education activities
  - The extent of the provider's compliance with the standards and requirements of the council
  - Results of the review and program modifications, if any

# The Good



- Patient Protection (8.1)

- ❖ N/A. Most providers do not utilize patients in continuing education activities

- HIPAA (8.2)

- ❖ Prior to the educational activity, speakers are required to sign a letter of agreement which states they agree to protect patient confidentiality by removing any identifying factors within their materials. The director also reviews the materials to ensure all identifying patient information is removed. HIPAA protection applies to all patients mentioned in lectures, not just those patients who are utilized in person.

# The Good



- Instructional Media (standard 9) - a type of continuing education activity utilizing instructional materials including but not limited to printed, recorded, and/or computer-assisted materials. Instructional media may be used over time at various locations and in themselves constitute a planned continuing education activity.
  - ❖ Examples of instructional media include but are not limited to books, journals, audiotapes, videotapes, and computer-assisted instructional programs. The intent of the Council is to anticipate the inclusion of the development of future technologies and methods of providing continuing education in the definition.

# The Good



- The provider shall be responsible for ensuring quality educational content and production of the activity (9.1).
  - ❖ Providers developing instructional media must:
    - consult with individuals who have technical expertise in both media and self-directed learning techniques and the application of these techniques to adult learning.
    - review the instructional material at least bi-annually or more frequently when indicated by new scientific developments.
  - ❖ The instructional media may not be certified for contact hours for more than three years without some review on the part of the provider ensuring current and accurate educational content.

# The Good



- Because there is no direct interaction between provider and/or faculty and the learner, the provider must communicate the following conditions to learners so they are aware of the information prior to starting the educational activity (9.2).
  - Medium or combination of media used
  - Method of participation in learning process
  - Estimated time to complete the activity
  - Date of original release, most recent review, or update
  - Post-assessment and evaluation methods, including the passing score for the post-assessment
  - Contact information
  - Instructor(s) credentials
  - Learning objectives
  - Instructor(s) financial disclosure
  - Termination date (date after which instructional media is no longer certified for credit)



# The Good



- ❑ The provider shall have and abide by a policy on privacy and confidentiality and must inform the learner about its policy (9.3).
- ❑ The provider shall document ownership of the copyright, permission, or otherwise permitted use of materials in a continuing education activity (9.4).
- ❑ Each activity shall include a content-oriented post-assessment (9.5 more on next slide).
- ❑ The provider shall ensure appropriate regulation of advertisement (9.6).
- ❑ The provider shall establish a justifiable, standard number of continuing education contact hours to be granted for completion of each activity (9.7).

# The Good



- Each activity shall include a content-oriented post-assessment (9.5).
  - ❖ The post-assessment must allow the provider to both measure the extent to which activity learning objectives have been accomplished and assess their mastery of the materials in terms of enhanced knowledge, skills, and/or competence.
  - ❖ The provider must ensure the existence of a process for the post-assessment validation. Validity is defined as the degree to which a test measures what it is supposed to measure. Validity, which is the most important quality of any test, emerges from the process of test construction.

# The Good



- The provider shall provide opportunity for learners to complete an evaluation process at the completion of the activity (9.8). The evaluation must request learners to assess areas including but not limited to the following:
  - Educational content (comprehensive, appropriate, and adequately in-depth to meet the stated objectives)
  - Methods by which the activity enhanced professional strategies, skills, and/or patient care
  - Quality of the instructional process and presentations including the effectiveness of educational methods and teaching materials
  - Individual instructor quality and effectiveness
  - Avoidance of commercial bias
  - Overall management of the activity
  - Identification of professional needs or interests for future activities

**Thank  
You!**