

Utah Medical Association Accreditation Policies Including Information for Provider Implementation

Utah Medical Association (UMA) policies supplement the Essential Areas and Elements and result from actions taken by UMA’s Accreditation Committee. These policies were developed by the ACCME’s Board of Directors and then adopted by the UMA Accreditation Committee.

These policies are organized according to topic, and presented in a format that is intended to assist providers in understanding the policies themselves, as well as UMA’s expectations for their implementation. If you have questions regarding these accreditation policies, please contact us at cmeaccreditation@utahmed.org.

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Accreditation Statement

The accreditation statement identifies the UMA accredited organization that is responsible for demonstrating the CME activity's compliance with the UMA's *Essential Areas and Elements* (including the *Standards for Commercial Support*) and *Accreditation Policies*. The accreditation statement must appear on all CME activity materials and brochures distributed by accredited organizations. The accreditation statement does not need to be included on initial, save-the-date type activity announcements since such announcements contain only general, preliminary information about the activity such as the date, location, and title. If more specific information is included, for example faculty and objectives, the accreditation statement must be included.

The UMA accreditation statement should read as follows:

For directly sponsored activities:

"The (name of accredited provider) is accredited by the Utah Medical Association to provide continuing medical education for physicians."

For jointly sponsored activities:

"This activity has been planned and implemented in accordance with the Essential Areas and policies of the Utah Medical Association (UMA) through the joint sponsorship of (name of accredited provider) and (name of non-accredited provider). The (name of accredited provider) is accredited by the UMA to provide continuing medical education for physicians."

There is no "co-sponsorship" accreditation statement. If two or more accredited providers are working in collaboration on a CME activity, one provider must take responsibility for the compliance of that activity. Co-sponsored CME activities should use the directly sponsored activity statement, naming the one accredited provider that is responsible for the activity.

The UMA has no policy regarding specific ways in which providers may acknowledge the involvement of other UMA or ACCME accredited providers in their CME activities.

CME Content Validation

Accredited providers are responsible for validating the clinical content of CME activities that they provide. (See the ACCME's *Validation of the Clinical Content of CME: The ACCME Expectations of Providers and of the Accreditation Process*.) Specifically,

1. All the recommendations involving clinical medicine in a CME activity must be based on evidence that is accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients.

2. All scientific research referred to, reported or used in CME in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection and analysis.

Commercial Support and Disclosure

These policies and definitions supplement the 2004 Updated ACCME Standards for Commercial Support: Standards to Ensure the Independence of CME Activities (“SCS”). The UMA has adopted the updated ACCME Standards for Commercial Support.

Relevant to SCS1 (Ensuring Independence in Planning CME Activities):

A **commercial interest** is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.

The ACCME does not consider providers of clinical service directly to patients to be commercial interests.

A commercial interest is not eligible for ACCME or UMA accreditation. Within the context of this definition and limitation, the ACCME and the UMA consider the following types of organizations to be eligible for accreditation and free to control the content of CME:

- 501-C Non-profit organizations (*Note: 501c organizations that advocate for 'commercial interests' as a 501c organization are not eligible for accreditation. They cannot serve in the role of joint sponsor, but they can be a commercial supporter.*)
- Government organizations
- Non-health care related companies
- Liability insurance providers
- Health insurance providers
- Group medical practices
- For-profit hospitals
- For profit rehabilitation centers
- For-profit nursing homes

ACCME reserves the right to modify this definition and this list of eligible organizations from time to time without notice.

ACCME’s Definition of a Commercial Interest as It Relates to Joint Sponsorship

In August 2007, the ACCME modified its definition of a "commercial interest." As has been the case since 2004, commercial interests cannot be accredited providers and cannot be "joint sponsors."

In joint sponsorship, either the accredited provider or its non-accredited joint sponsor can have control of identification of CME needs, determination of educational objectives, selection and

presentation of content, selection of all persons and organizations that will be in a position to control the content of the CME, selection of educational methods, and evaluation of the activity. To maintain CME as independent from commercial interests, control of identification of CME needs, determination of educational objectives, selection and presentation of content, selection of all persons and organizations that will be in a position to control the content of the CME, selection of educational methods, and evaluation of the activity cannot be in the hands of a commercial interest.

The ACCME's deadline of August 2009 is the date by which ACCME and UMA will hold accredited providers accountable to the August 2007 revised definition of commercial interests. The ACCME and UMA have given accredited providers that might be affected by the revised definition of commercial interest two years (until August 2009) to modify their corporate structures so that the CME component of their organization will be an independent entity.

This timeline would also apply for organizations involved in joint sponsorship. After August 2009, accredited providers will not be able to work in joint sponsorship with non-accredited providers that produce, market, re-sell, or distribute health care goods or services consumed by, or used on, patients.

If an accredited provider has questions related to its own corporate structure or that of a joint sponsor in the context of the definition of commercial interest, or clarification of their status or eligibility as joint sponsor, please contact the UMA at cmeaccreditation@utahmed.org.

Relevant to SCS2 (Identifying and Resolving Conflicts of Interest):

Financial Relationships: Financial relationships are those relationships in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. Financial benefits are usually associated with roles such as employment, management position, independent contractor (including contracted research), consulting, speaking and teaching, membership on advisory committees or review panels, board membership, and other activities from which remuneration is received, or expected. ACCME considers relationships of the person involved in the CME activity to include financial relationships of a spouse or partner.

With respect to personal **financial relationships**, 'contracted research' includes research funding where the institution gets the grant and manages the funds and the person is the principal or named investigator on the grant.

Conflict of Interest: Circumstances create a conflict of interest when an individual has an opportunity to affect CME content about products or services of a commercial interest with which he/she has a financial relationship.

The ACCME considers **financial relationships** to create actual conflicts of interest in CME when individuals have both a financial relationship with a commercial interest and the opportunity to affect the content of CME about the products or services of that commercial

interest. The ACCME considers “content of CME about the products or services of that commercial interest” to include content about specific agents/devices, but not necessarily about the class of agents/devices, and not necessarily content about the whole disease class in which those agents/devices are used.

With respect to **financial relationships** with commercial interests, when a person divests themselves of a relationship it is immediately not relevant to conflicts of interest but it must be disclosed to the learners for 12 months.

Relevant to SCS3 (Appropriate Use of Commercial Support)

Commercial Support is financial, or in-kind, contributions given by a commercial interest (see Policies relevant to SCS1), which is used to pay all or part of the costs of a CME activity.

An accredited provider can fulfill the expectations of SCS 3.4-3.6 by adopting a previously executed agreement between an accredited provider and a commercial supporter and indicating in writing their acceptance of the terms and conditions specified and the amount of commercial support they will receive.

A provider will be found in Noncompliance with SCS 1.1 and SCS 3.2 if the provider enters into a commercial support agreement where the commercial supporter specifies the manner in which the provider will fulfill the requirements of the UMA’s *Essential Areas and Elements* (including the *Standards for Commercial Support*) Accreditation Policies. Element 3.12 of the ACCME’s Updated Standards for Commercial Support applies only to physicians whose official residence is in the United States.

Relevant to SCS4 (Appropriate Management of Commercial Promotion)

Commercial exhibits and advertisements are promotional activities and not continuing medical education. Therefore, monies paid by commercial interests to providers for these promotional activities are not considered to be ‘commercial support’. However, accredited providers are expected to fulfill the requirements of SCS 4 and to use sound fiscal and business practices with respect to promotional activities.

Relevant to SCS6 (Disclosure to Learners)

Disclosure of information about provider and faculty relationships may be disclosed verbally to participants at a CME activity. When such information is disclosed verbally at a CME activity, providers must be able to supply UMA with written verification that appropriate verbal disclosure occurred at the activity. With respect to this written verification:

1. A representative of the provider who was in attendance at the time of the verbal disclosure must attest, in writing:
 - a) that verbal disclosure did occur; and
 - b) itemize the content of the disclosed information (SCS 6.1); or that there was nothing to disclose (SCS 6.2).

2. The documentation that verifies that adequate verbal disclosure did occur must be completed within one month of the activity.

The provider's acknowledgment of commercial support as required by SCS 6.3 and 6.4 may state the name, mission, and areas of clinical involvement of the company or institution and may include corporate logos and slogans, if they are not product promotional in nature.

Credit Certificates for CME

It is the responsibility of the accredited provider to maintain attendance records for six years. (See "Records Retention") As a courtesy to the participant, an accredited provider may award a Certificate of Award to the attending physician at the conclusion of the activity, although the issuance of CME credit certificates to participants is not a requirement for UMA accreditation. The *AMA PRA Category 1 Credit*TM designation is owned by the American Medical Association; the AMA has determined that only US licensed physicians may be awarded *AMA PRA Category 1 Credit*TM. Non-physicians attending a category 1 designated activity may be given a Certificate of Attendance.

The AMA requires that Certificates of Award be worded as follows:

Certificate of Award for physicians:

The [name of accredited provider] certifies that [name of physician] has participated in the educational activity titled [title of activity] at [location, when applicable] on [date] and is awarded [number of credits] category 1 credit(s) toward the AMA Physician's Recognition Award.

Certificate of Attendance for non-physicians:

The [name of accredited provider] certifies that [name of participant] has participated in the educational activity titled [title of activity] at [location, when applicable] on [date]. The activity was designated for [number of credits] AMA PRA category 1 credit(s).

Credit Designation Statement

To designate (or certify) an activity for *AMA PRA Category 1 credit*TM refers to the process by which an accredited provider establishes that an activity meets AMA PRA Standards. The AMA delegates to accredited providers, who comply with all AMA PRA rules, the ability to award AMA PRA category 1 credit to those physicians who participate in their appropriately certified activities. Along with complying with the definition of CME and adherence to the *Essential Areas and Elements* (including the *Standards for Commercial Support*) the accredited provider must ensure that the content of the educational activity designated for credit is scientifically based, accurate, current, and objectively presented.

The designation statement for AMA PRA credits must be worded as follows:

The [name of accredited provider] designates this educational activity for a maximum Of [number of credits] AMA PRA *Category 1 Credit(s)*TM. Physicians should only claim credit commensurate with the extent of their participation in the activity.

As printed in the AMA's *The Physician's Recognition Award and Credit System: Information for Accredited Providers and Physicians*

“AMA PRA Category 1 Credit is a trademark of the American Medical Association. Accredited providers are required to use “AMA PRA Category 1 CreditTM whenever the complete phrase is first used in any publication and periodically through the publication. This standard language, along with the Designation Statement, benefits both the providers and physicians by clearly communicating the provider's privilege to award AMA PRA *Category 1 Credit*TM on behalf of the AMA.”

The credit designation statement should immediately follow the accreditation statement and be included in all CME activity materials and brochures distributed by the accredited organization.

Definition of CME

The ACCME and UMA definition of CME describes what content is acceptable for activities that are certified for credit:

Continuing medical education consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public, or the profession. The content of CME is that body of knowledge and skills generally recognized and accepted by the profession as within the basic medical sciences, the discipline of clinical medicine, and the provision of health care to the public.

A broad definition of CME, such as the one found above, recognizes that all continuing educational activities which assist physicians in carrying out their professional responsibilities more effectively and efficiently are CME. A course in management would be appropriate CME for physicians responsible for managing a health care facility; a course in educational methodology would be appropriate CME for physicians teaching in a medical school; a course in practice management would be appropriate CME for practitioners interested in providing better service to patients.

Not all continuing educational activities which physicians may engage in however are CME. Physicians may participate in worthwhile continuing educational activities which are not related directly to their professional work and these activities are not CME. Continuing educational activities which respond to a physician's non-professional educational need or interest, such as

personal financial planning or appreciation of literature or music, are not CME. CME that discusses issues related to coding and reimbursement in a medical practice falls within the definition of CME.

All CME educational activities developed and presented by a provider accredited by the UMA and associated with *AMA PRA Category 1 CreditTM* must be developed and presented in compliance with all UMA accreditation requirements -- in addition to all the requirements of the AMA PRA program. All activities so designated for, or awarded, credit will be subject to review by the UMA accreditation process as verification of fulfillment of the UMA accreditation requirements. For information on the AMA PRA program, go to www.ama-assn.org and search "AMA PRA."

Providers are not eligible for UMA accreditation or reaccreditation if they present activities that promote recommendations, treatment or manners of practicing medicine that are not within the definition of CME or are known to have risks or dangers that outweigh the benefits or known to be ineffective in the treatment of patients. An organization whose program of CME is devoted to advocacy of unscientific modalities of diagnosis or therapy is not eligible to apply for UMA accreditation.

Eligibility for UMA Accreditation

Only certain organizations are eligible to receive UMA accreditation. Organizations whose programs of CME primarily serve physician learners, 70 percent or more of whom are from the home or contiguous state(s) of the organization, can be accredited by the UMA. In addition to the audience served, the following criteria must be met before an organization will be considered for accreditation:

The organization must,

- Be located in the state of Utah.
- Be developing and/or presenting a program of CME for physicians on a **regular and recurring** basis.
- Not be a commercial interest.
- Not be developing and/or presenting a program of CME that is, in the judgment of the UMA, devoted to advocacy on unscientific modalities of diagnosis or therapy.
- 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.

The ACCME accredits the following institutions, if they choose to seek accreditation:

- State medical societies
- Liaison Committee for Medical Education (LCME)-accredited schools of medicine

- National physician membership organizations
- National medical specialty societies and
- Other organizations whose programs of CME serve physician learners, 30 percent or more of whom are from **beyond** the home or contiguous state(s) of the organization.

Note that a CME provider may not maintain both ACCME and UMA accreditation at the same time. If a UMA accredited provider alters its function and successfully achieves ACCME accreditation, that provider must notify the UMA. A similar process follows for ACCME accredited providers that become accredited by the UMA.

Enduring Materials

An enduring material is a non-live CME activity that "endures" over time. It is most typically a videotape, monograph, or CD ROM. Enduring materials can also be delivered via the Internet. The learning experience by the physician can take place at any time in any place, rather than only at one time and one place, like a live CME activity.

Enduring materials must comply with all *UMA Essential Areas and Elements* (including the *Standards for Commercial Support*) and Accreditation Policies. However, there are specific communication requirements for enduring materials because of the nature of the activities. Because there is no direct interaction between the provider and/or faculty and the learner, the provider must communicate the following information to participants so that they are aware of this information prior to starting the educational activity:

1. Principal faculty and their credentials;
2. Medium or combination of media used;
3. Method of physician participation in the learning process;
4. Estimated time to complete the educational activity (same as number of designated credit hours);
5. Dates of original release and most recent review or update; and
6. Termination date (date after which enduring material is no longer certified for credit).

For CME activities including those in which the learner participates electronically (e.g., via Internet, CD-ROM, satellite broadcasts), all required UMA information must be transmitted to the learner prior to the learner beginning the CME activity (see also see UMA's policies regarding disclosure in the Standards for Commercial Support). All new CME activities released on or after January 1, 2008 must conform to this policy. Existing CME activities that are reviewed and re-released after January 1, 2008 must conform to this policy.

Providers that produce enduring materials must review each enduring material at least once every three years or more frequently if indicated by new scientific developments. So, while providers can review and re-release an enduring material every three years (or more frequently), the enduring material cannot be certified for credit for more than three years without some review on the part of the provider to ensure that the content is still up-to-date and accurate. That

review date must be included on the enduring material, along with the original release date and a termination date.

Accredited providers may not enlist the assistance of commercial interests to provide or distribute enduring materials to learners.

UMA policy does not require 'post-tests' for enduring materials. UMA records retention policies do, however, require participants to verify learner participation and evaluate all CME activities. So, accredited providers often choose to include a post-test in their enduring material activities as a way to comply with those two requirements.

Sometimes providers will create an enduring material from a live CME activity. When this occurs, UMA considers the provider to have created two separate activities – one live activity and one enduring material activity. Both activities must comply with all UMA requirements and the enduring material activity must comply additionally with all UMA policies that relate specifically to enduring materials.

Fees

UMA providers are accountable for timely submission of fees that are required either to attain or maintain accreditation. UMA's Accreditation Fee Schedule lists current fees and describes all related policies.

Internet CME

Live or enduring material activities that are provided via the Internet are considered to be "Internet CME." Internet CME must comply with all UMA *Essential Areas and Elements* (including the *Standards for Commercial Support*) and Accreditation Policies. However, there are special requirements for Internet CME because of the nature of the activities:

Activity Location: UMA accredited providers may not place their CME activities on a website owned or controlled by a "commercial interest."

Links to Product Websites: With clear notification that the learner is leaving the educational website, links from the website of a UMA accredited provider to pharmaceutical and device manufacturers' product websites are permitted before or after the educational content of a CME activity, but shall not be embedded in the educational content of a CME activity.

Transmission of information: For CME activities in which the learner participates electronically (e.g., via Internet, CD-ROM, satellite broadcasts), all required UMA information must be transmitted to the learner prior to the learner beginning the CME activity. All new CME activities released on or after January 1, 2008 must conform to this policy. Existing CME activities that are reviewed and re-released after January 1, 2008, must conform to this policy.

Advertising: Advertising of any type is prohibited within the educational content of CME activities on the Internet including, but not limited to, banner ads, subliminal ads, and pop-up window ads. For computer based CME activities, advertisements and promotional materials may not be visible on the screen at the same time as the CME content and not interleaved between computer ‘windows’ or screens of the CME content.

Hardware/Software Requirements: The accredited provider must indicate, at the start of each Internet CME activity, the hardware and software required for the learner to participate.

Provider Contact Information: The accredited provider must have a mechanism in place for the learner to be able to contact the provider if there are questions about the Internet CME activity.

Policy on Privacy and Confidentiality: The accredited provider must have, adhere to, and inform the learner about its policy on privacy and confidentiality that relates to the CME activities it provides on the Internet.

Copyright: The accredited provider must be able to document that it owns the copyright for, or has received permissions for use of, or is otherwise permitted to use copyrighted materials within a CME activity on the Internet.

Joint Sponsorship

UMA accredited providers that plan and present one or more activities with non- accredited providers are engaging in “joint sponsorship.”

Whether directly or jointly sponsored, the UMA expects all CME activities to be in compliance with the *Essential Areas and Elements* (including the *Standards for Commercial Support*) and Accreditation Policies. In cases of joint sponsorship, it is the UMA accredited provider’s responsibility to be able to demonstrate this compliance through written documentation to the UMA. Materials submitted that demonstrate compliance may be from either the UMA accredited provider’s files or those of the non-accredited provider.

Note that if a jointly sponsored activity is found to be in Non-Compliance with UMA’s content validation policies or policies for disclosure and commercial support, the accredited provider in the relationship may be asked to provide one or more Progress Reports related to the issue. Similarly, special requirements exist for accredited providers that jointly-sponsor activities with non-accredited organizations that have a history of joint-sponsoring activities that do not comply with UMA’s content validation policies or policies for disclosure and commercial support. The accredited provider must inform the learner of the joint sponsorship relationship through the use of the appropriate accreditation statement. All printed materials for jointly sponsored activities must carry the appropriate accreditation statement.

If a provider is placed on probation, it may not jointly sponsor CME activities with non-accredited providers, with the exception of those activities that were contracted prior to the probation decision. A provider that is placed on probation must inform the UMA of all existing

joint sponsorship relationships, and must notify its current contracted joint sponsors of its probationary status.

The UMA maintains no policy that requires or precludes accredited providers from charging a joint sponsorship fee.

Journal CME

A journal-based CME activity includes the reading of an article (or adapted formats for special needs), a provider stipulated/learner directed phase (that may include reflection, discussion, or debate about the material contained in the article(s)) and a requirement for the completion by the learner of a pre-determined set of questions or tasks relating to the content of the material as part of the learning process.

The UMA considers information required to be communicated before an activity (e.g., disclosure information, disclosure of commercial support, objectives), CME content (e.g., articles, lectures, handouts, and slide copies), content-specific post-tests, and education evaluation all to be elements of a journal-based CME activity.

The educational content of journal CME must be within the UMA's Definition of CME. Journal CME activities must comply with all UMA *Essential Areas and Elements* (including the *Standards for Commercial Support*) and Accreditation Policies. Because of the nature of the activity, there are two additional requirements that journal CME must meet:

- 1) The UMA does not consider a journal-based CME activity to have been completed until the learner documents participation in that activity to the provider.
- 2) None of the elements of journal-based CME can contain any advertising or product group messages of 'commercial interests'. Disclosure information cannot contain trade names. The learner should not encounter advertising within the pages of the article or within the pages of the related questions or evaluation materials.

Logo/Press Releases

The UMA's logo may be used only by the UMA. Providers, therefore, **may not** use the UMA's logo in their promotional or educational materials.

For providers that would like to distribute a press release announcing their success in obtaining either initial or continued UMA accreditation, the following language may be used for that purpose only:

“FOR IMMEDIATE RELEASE

The [name of accredited provider] has been (re)surveyed by the Utah Medical Association (UMA) and awarded accreditation for (number of years) years as a provider of continuing medical education for physicians.

UMA accreditation seeks to assure both physicians and the public that continuing medical education activities provided by [name of accredited provider] meet the high standards of the *Essential Areas and Elements* and Accreditation Policies as specified by the UMA. The UMA evaluates the overall continuing medical education programs of institutions according to standards adopted by the Accreditation Council for Continuing Medical Education (ACCME) and its sponsors. These sponsors are the American Board of Medical Specialties, the American Hospital Association, the American Medical Association, the Association for Hospital Medical Education, the Association of American Medical Colleges, the Council of Medical Specialty Societies, and the Federation of State Medical Boards of the U.S., Inc.” The UMA is recognized by the ACCME as a state accrediting body for CME.

Records Retention

Specific CME activity records must be maintained by all accredited providers. Records retention requirements relate to the following two topics: Attendance Records and Activity Documentation.

Attendance Records: An accredited provider must have mechanisms in place to record and, when authorized by the participating physician, verify participation for six years from the date of the CME activity. The accredited provider is free to choose whatever registration method works best for their organization and learners. The UMA does not require sign-in sheets.

Activity Documentation: An accredited provider is required to retain activity files/records of CME activity planning and presentation during the current accreditation term or for the last twelve months, whichever is longer. Maintenance of this documentation enables the provider to, at the time of reaccreditation, demonstrate to the UMA how the activities it provided during its current term of accreditation were compliant with UMA’s *Essential Areas and Elements* (including the *Standards for Commercial Support*) and Accreditation Policies. For guidance on the nature of documentation that UMA will expect to review at the time of reaccreditation, please review the UMA’s Documentation Review for a CME Activity form that accreditation surveyors use, as well as the Documentation Review Form Labels which providers use to identify evidence of compliance within their files/records.

Additionally, if UMA receives a complaint about an accredited provider and the complaint relates to the provider’s implementation of one or more *UMA Essential Areas or Elements* or Accreditation Policies, UMA may ask the provider to respond to the complaint according to UMA’s Procedure for Handling Complaints/Inquiries.

Regarding UMA’s Procedure: The length of time during which an accredited provider must be accountable for any complaints/inquiries received by the UMA is limited to twelve months from the date of the activity or in the case of a series, twelve months from the date of the activity which is in question. Information and correspondence generated via the Procedure is maintained as confidential.

Regularly Scheduled Series (RSSs)

UMA defines “regularly scheduled series,” (also known as regularly scheduled conferences) as weekly or monthly CME activities that are primarily planned by and presented to the provider’s professional staff. Providers that furnish these types of activities must describe and verify that they have a system in place to monitor these activities’ compliance with the *Essential Areas and Elements* (including the *Standards for Commercial Support*) and Accreditation Policies. Examples of regularly scheduled series include grand rounds, tumor boards, and morbidity and mortality conferences.

The monitoring system must:

1. Be based on real performance data and information derived from the RSCs that describes compliance (in support of UMA Elements 2.1, 2.5 and 3.1 – 3.3), and
2. Result in improvements when called for by this compliance data (in support of UMA Elements 2.4, 2.5 and 3.1), and
3. Ensure that appropriate Letters of Agreement are in place whenever funds are contributed in support of CME (in support of UMA Element 3.3).

The provider also is required to make available and accessible to the learners a system through which data and information on a learner’s participation can be recorded and retrieved. The critical data and information elements include learner identifier, name/topic of activity, date of activity, hours of credit designated or actually claimed.