

<u>SUBJECT</u>	<u>EFFECTIVE DATE</u>
Honoraria Policy, Procedures, and Guidelines	<u>1/1/2015</u>



Boston Children's Hospital
 Continuing Medical Education Department
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Purpose

This policy outlines the payment of honoraria for contributors to CME activities certified by Boston Children's Hospital. This policy is established in accordance with requirement 3.7 of the ACCME's *Standards for Commercial Support of Continuing Medical Education*SM. *Standards to Ensure the Independence in CME Activities (SCS)*. It covers all Boston Children's- affiliated and non-Boston Children's affiliated individuals considered to be planners, faculty, authors and reviewers of CME activities (e.g., course directors, guest speakers and lecturers, authors of online courses or enduring materials, etc.).

Honoraria Policy

Postgraduate continuing medical education (CME) activities offered by Boston Children's Hospital may pay reasonable honoraria to the academic planners, faculty, authors, and reviewers who develop and implement these activities.

The decision to offer honoraria payment is at the discretion of Course Directors and their Department Chair. Boston Children's Hospital does not prescribe honoraria levels, but rather provides guidelines for determining appropriate amounts (see below).

All honoraria payments, particularly those paid from activities receiving commercial support are predicated on the faithful adherence of individuals and partner institutions to the Boston Children's Hospital conflict of interest policies and ACCME SCS.

Role of Commercial Support and Honoraria

- If an activity is receiving commercial support, funders may not play any role in determining honoraria rates.¹
- No individual involved in a CME activity may receive payment directly from a commercial interest, including honoraria, travel, out-of-pocket expenses or other payments.²
- Specific honoraria amounts are based on a variety of factors and will be determined on a case-by-case basis. Some considerations include but are not limited to: type of activity, role played in the activity (e.g., advisor, speaker, author, reviewer, etc.), preparation time and amount of time the activity commitment may take away from practice, number of presentations, length of presentation(s), credentials, faculty's professional reputation, complexity of outcomes data needed, budget available for the individual activity, etc.

¹See ACCME Standards 3.1 and 3.2.

²See ACCME Standards 3.8 and 3.9.

- The submitted budget for the CME activity must be approved by the Department Chair and must include all projected honoraria expenses. CMED will require specific Department Chair approval of any deviations from the approved activity budget.

Guidelines for External (Non-BCH) Speakers:

- For budgeting purposes, the rate structure below provides a potential range of acceptable honoraria that is informed by a survey of 36 medical schools conducted on behalf of the Alliance for Continuing Medical Education (ACME).

Live In-Person Activities Faculty Honorarium Range (e.g. traditional live courses, community programs, clinical preceptorships)	
Activity Type	Guidelines
Local, State-wide or Regional Audience (Presentation)	Up to \$2,000
National or International Audience (Presentation)	Up to \$2,500
National or International Audience (Keynote Address)	Up to \$3,000

- Honoraria that exceed the maximum listed above should be fully justified in the budget. The CMED will review extraordinary rate requests for possible approval, and may seek counsel from the BCH Standing Committee on Continuing Medical Education.

Guidelines for Boston Children’s Speakers in Traditional Live Courses:

- As part of a faculty member’s key responsibilities associated with their academic appointment, it is customary for Boston Children’s faculty to participate in CME activities without additional remuneration. Thus, Course Directors and their Department Chairs may determine that no honoraria should be paid to Boston Children’s faculty who speak in their courses. This policy, however, does not preclude such payments, and it is recommended that honoraria levels not exceed \$500 per engagement for these individuals.

Guidelines for Course Directors:

- The decision to bonus Course Directors with an additional honorarium is at the discretion of the Department Chair, though for many departments, this is not a customary practice. In order for CMED to process such bonuses to Course Directors, CMED must have written authorization from the Department Chair.

Guidelines for Distance Learning Activities:

- Levels of participation in distance learning activities (e.g. live or enduring Internet CME, telephone, CD, DVD, MP3/MP4, print monographs, etc.) can be highly variable. Consequently, honoraria for participating in all of these types of continuing education activities will be set by CMED based on the factors listed above with specific attention to the amount of effort entailed.

Honoraria Payment Procedures

Payment of honoraria may be made by Boston Children's Hospital; if commercial support is received for a specific activity, honoraria payments must be approved by CMED. Further, if faculty members wish to participate as learners in the remainder of an educational event after their teaching assignment, reimbursement may only be paid for their teacher or author role.³

The following process will be followed for payment of honoraria*:

1. During the activity proposal submission, the Course Director will complete the budget included in the Activity Proposal and provide honoraria payments detail by individual.
2. The budget will be approved by the Department Chair.
3. After the CME activity has taken place, the Course Director or Course Administrator will submit honoraria payment requests through CMED.
4. CMED's Financial Coordinators will review payment requests and check them against the approved budget.
5. If a request deviated from the approved budget, CMED will request verification form the Course Director or Course Administrator; special approval by the Department Chair will be required for variances over \$500 from the total honoraria budget.
6. If a requested rate approved by the Department Chair significantly exceeds suggested guidelines, the Medical Director for Continuing Education will provide further review.
7. CMED will approve honoraria requests for payment and then the Department can work with Finance for payment.
8. Finance honorarium policy and forms can be found here - <http://web2.tch.harvard.edu/finance/mainpageS2601P70.html#Q33>

Other Support for Academic Planners, Faculty, and Authors

Travel-related expenses, hotel accommodations, and other activity- related expenses for academic planners, faculty and authors are also supported by tuition revenue and commercial support. Such expenses must be paid in accordance with the [Boston Children's Hospital Travel Policy](#):

See attached Travel Expense Form

Costs of personal expenses, expenses of travel companions, or entertainment will not be supported by either tuition revenue or commercial support.

* The CME Department is not responsible for processing payment of honorarium(s) or any expenses. The department sponsoring the conference is responsible for handling and processing all payments through Accounts Payable.

³See ACCME Standard 3.10.