Hartford Care	Policy for Continuing Education Probation	
Continuing Education Department	<b>Original Date:</b> 4/22/2020	Approved By:
	<b>Revision Date:</b> 10/22/2020	Thomas Nowicki, MD System Director of Medical Education
	<b>Effective Date:</b> 10/22/2020	
		<b>Approval Date:</b> 10/22/2020

# **Purpose:**

The purpose of this policy is to define the penalties when the Continuing Education (CE) Policies of the Hartford HealthCare CE team, Joint Accreditation (JA), or any other professional education accrediting agency are not followed.

This Policy is to be used in conjunction with the HHC CE Policy for Independence and Commercial Support. Failure to follow this policy will adversely affect the status of Hartford HealthCare as an accredited provider of CE.

## Scope:

This policy applies to all educational activities approved for CE.

## **Policy:**

- The CE Team reserves the right to take disciplinary action against an Activity Medical Director or Sponsoring Department of an HHC-approved CE activity who fails to meet the HHC CE Policies.
- The HHC System Director of Medical Education will inform the Activity
  Director and Department Chief in writing (via e-mail, read receipt requested)
  of non-compliance with HHC CE Policies and the intended disciplinary action
  against the Activity Medical Director or Sponsoring Department.
- The term/length of the disciplinary action will be specified in the notification.
- Disciplinary action is at the discretion of the System Director of Medical Education, and may include, but is not limited to,
  - The Activity Medical Director or Sponsoring Department requiring oversight by an individual assigned by the CE Team
  - Removal of the Activity Medical Director or Sponsoring Department from planning and hosting any CE activity for a specific length of time
  - Mandatory education on the CE Policies
  - Denial of CE approval
- The Activity Medical Director or Sponsoring Department may appeal within thirty (30) calendar days of written notification.
  - If the applicant does not appeal within thirty (30) calendar days of written notification, the decision will be considered final.
- Upon receipt of an appeal, the HHC System Director of Medical Education will appoint a 3-person appeal panel to review the disciplinary action, the letter of appeal, and any supporting documentation.
  - The HHC System Director of Medical Education will notify the Activity Medical Director or Sponsoring Department within sixty (60) calendar days of receipt of the appeal of the final decision.

#### **Definitions:**

- Activity Medical Director: The individual in charge of planning, implementing, and evaluating the CME/CE activity and who is responsible for collaborating with HHC CE to ensure compliance
- Sponsoring Department: The department, organization, hospital, or institute responsible for planning, presenting, and evaluating the CE Activity
- CE Team: The Hartford HealthCare Continuing Education Team

### **References:**

ACCME Standards for Integrity and Independence

## **Related Policies:**

- HHC Vendor Interaction Policy
- HHC Conflict of Interest Policy
- HHC CE Policy for Independence and Commercial Support

# **Related Documents:**