



<b>TITLE:</b> <i>Continuing Pharmacy Education (CPE) for Pharmacists and Pharmacy Technicians</i>			
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**TITLE:** *Continuing Pharmacy Education (CPE) for Pharmacists and Pharmacy Technicians*

**I. Purpose/Expected Outcome:**

The purpose of this policy is to describe the guiding principles of Continuing Pharmacy Education (CPE) operations as administered by Banner Boswell Medical Center – Department of Pharmacy on behalf of Banner Health and to identify the regulatory standards, internal policies and accreditation requirements that govern continuing pharmacy education.

**II. Definitions:**

A. Accreditation Council for Pharmacy Education Definition - ***Continuing education for the profession of pharmacy is a structured educational activity designed or intended to support the continuing development of pharmacists and/or pharmacy technicians to maintain and enhance their competence. Continuing pharmacy education (CPE) should promote problem-solving and critical thinking and be applicable to the practice of pharmacy.***

B. **Mission Statement**

The mission of Banner Health’s Continuing Pharmacy Education (CPE) Program as administered by Banner Boswell Medical Center, Department of Pharmacy is to provide educational opportunities and programs that support any of the following: evidence based care and quality improvement, facilitation of integrated interdisciplinary teams and professional growth, efficient utilization of information technology and other tools and aid pharmacists and pharmacy technicians in delivering patient-centered care.

**Goals of the CPE Program**

1. To facilitate the professional and educational development and ensure the competency of the pharmacy by enhancing awareness of current and new pharmacological agents and safe and effective medication management principles
2. To showcase current and new therapeutic, pharmacy practice- related guidelines, consensus statements, evidence-based treatment options, and standards of care.
3. To assist in the development of skills needed to meet the challenges of a changing pharmacy professional landscape by providing education on topics related to, but not limited to professionalism, strengthening work relationships, group dynamics and team development, mentoring and research.



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4. To directly affect and result in the advanced education of our pharmacy staff thereby promoting the optimal patient care.
  5. To facilitate and enhance the knowledge and competency around new and emerging pharmacy systems focused on the safe dispensing, delivery and monitoring of medication.
  6. Pharmacist goals
    - a. In accordance with Banner Health's mission statement ((We exist to make a difference in people's lives through excellent patient care")), educational offerings will be provided to enhance the clinician's ability to positively affect the care of our patients.
    - b. To further our professional and integration of pharmacist in the collaborative approach to patient-centered care.
  7. Pharmacy Technician goals
    - a. To identify process improvement opportunities that allows more efficient delivery of patient-centered care.
    - b. To identify areas of desired growth, Banner Health CPE Granting Board hopes to provide educational offerings that enhance the engagement of our pharmacy technicians.

### III. Policy:

Banner Health *has been accredited* to provide pharmacist and pharmacy technician continuing education credit by the Accreditation Council for Pharmacy Education (ACPE). Banner Health adheres to the *Policy and Procedures and Standards* set forth by ACPE. The CPE program supports the mission and care management goals of Banner Health which are based on providing excellent patient care through continual quality improvement. The CPE program will be evaluated as outlined by ACPE.

- A. **ADMINISTRATOR:** There shall be a Banner Health CPE Administrator reporting to the Banner Boswell Medical Center Director of Pharmacy, or designee, with responsibility for the Banner CPE program, including the responsibilities specifically set forth in this policy. This administrator will work closely with the Banner Department for CME in any program that applies for both CPE and CME credit. The administrator shall be chosen and comply with all requirements set forth in the *ACPE Policies and Procedures* including those governing the selection, responsibilities and function. If a change in administrator is necessary, the following must occur:
  1. *Prompt notification to ACPE whenever a change takes place*
  2. *Adequate training of the new administrator to ensure familiarity with ACPE standards, ACPE policy and procedures, general administrative and other liaison responsibilities between the provider and*
  3. *Adequate training in all other areas of operational and policy responsibility for the Banner Health's continuing pharmacy education efforts*
- B. **GOVERNING BODY FOR APPROVAL:** Continuing Pharmacy Education activities sponsored by Banner Health must be planned and implemented in accordance with the *ACPE Policies and Procedures*. Pharmacist and Pharmacy Technician involvement in the activity planning process is essential. All CPE requests will be reviewed by the **Banner Health CPE Granting Board** which will include at minimum the CPE



Administrator, one pharmacist and one technician. Other members may include the Director for Graduate Education, the Director for CME education and any other member of the health care team who might enhance the ability to meet the mission of the Banner Health CPE program.

**1. ACPE Granting Board Review Process/procedure**

- a.  $\geq 45$  days prior to CPE activity: Review and approve/deny application for CPE credit, Needs Assessment, and Disclosure Statement document related to CPE activity, etc.
  - i. Title of CPE activity, measurable learning objectives, learning assessment questions with explanations/citations, etc.
- b.  $\geq 14$  days prior to CPE activity: Review close to finalized presentation content and assess for bias. Citations/references (if warranted) may be reviewed to ensure it is evidence based and relevant to pharmacy practice.
- c.  $\geq 3$  days prior to CPE activity: Final draft of presentation due for review by ACPE Granting Board to verify if suggested revisions have been implemented.

**C. PLANNING:** Banner-sponsored CPE activities will comply with the following:

1. Per ACPE definition, all activities accredited by Banner Health for both pharmacists and pharmacy technicians will fit into one of the following categories:
  - a. Knowledge-based CPE activity: These CPE activities are primarily constructed to transmit knowledge (i.e., facts). The facts must be based on evidence as accepted in the literature by the health care professions. The minimum amount of credit for these activities is 15 minutes or 0.25 contact hour.
  - b. Application-based CPE activity. These CPE activities are primarily constructed to apply the information learned in the time frame allotted. The information must be based on evidence as accepted in the literature by the health care professions. The minimum amount of credit for these activities is 60 minutes or one contact hour.
2. The applicant or Activity Director will determine which activity designation they would like to apply for and the CPE administrator will confirm. The type of activity will be displayed in the activity announcement.
3. Needs Assessment - Each activity will be preplanned to:
  - a. address an identified professional practice gap in knowledge, competence or performance, and/or
  - b. encourage a change in practice of the target population of pharmacists or pharmacy technicians
4. A variety of methods will be utilized to identify areas of need which may include, but are not limited to,
  - a. identification of new or unmet regulatory requirements
  - b. introduction of new practice standards, new information technology tools or new therapies
  - c. Quality improvements identified through known or perceived deficits solicited directly from the target audience or their customers.
5. The practice gap and desired result of the education will be discussed prior to the event with faculty to support development of content that will best address the identified educational need and accomplish the desired results.



6. Objectives - Measurable learning objectives will be developed based on the identified performance gap, identified as a gap in knowledge, competence or performance.
7. Format/Design – The educational format of activities will vary. The activity format will be appropriate for the setting, objectives and to achieve the desired results.
8. Evaluation – An evaluation mechanism must be incorporated that will indicate whether the activity met the stated objectives and promoted a change in practice.
  - a. Learners will receive feedback on assessment directly at the completion of the activity or within one week. Banner Health encourages *point-in-time* feedback whenever feasible.
  - b. Feedback will be delivered constructively and will be utilized as a teaching tool by giving the learners the correct answers to questions or case studies along with details supporting the correct answer.
  - c. Evaluations and comments from learners will be tabulated and tracked as a quality measure of the Banner Health CPE program and will also be utilized as part of the needs assessment.
  - d. Overall Banner Health CPE program evaluation
    - i. Compile individual evaluations and assess the data
    - ii. Determine if collected data *reflects that the education provided* meets the CPE mission statement and goals
    - iii. Discuss results-*what is the impact on the system?*
    - iv. Develop plan for future improvement of BH CPE program
9. Faculty - Faculty will be selected clearly based on their ability to address the identified educational need.
  - a. Faculty may be selected from a variety of appropriate sources. Selection is the responsibility of the individual(s) planning the event or designee authorized to act on behalf of the planning individual(s).
  - b. Educational needs will be communicated to faculty and feedback may be provided regarding content as needed to meet the mission, goals and needs of the program.
  - c. Honorarium amount shall be set in advance, with no adjustments after the fact. Amount should be suitable and customary and may not exceed fair market value, without consideration of referrals generated, tax implications for faculty, or inclusion of specific content in the presentation(s). Fair market value will be determined according to Banner Health policy. A written agreement between faculty and Banner Health is required and must be executed prior to the CE activity, as directed by Banner Health policy.
10. Objectivity/Disclosure of Conflicts of Interest - Educational activities must be free of commercial bias and influence. To that end, the following policies and procedures have been implemented:
  - a. CE Disclosure Policy - It is the policy of Banner Health to ensure balance, independence, objectivity, and scientific rigor in all the organizations sponsored or jointly sponsored continuing pharmacy education (CPE). To this end, all program planners and faculty participating in Banner Health sponsored CPE must disclose relevant financial interest in any commercial organization or product. Failure to provide disclosure information will result in disqualification from participation. The



- intent of this policy is to identify conflicts of interest, facilitate resolution according to Banner policy, and ensure disclosure information is provided to participants prior to the activity, so they may form their own judgment as to the objectivity of the educational content.
- b. Prior to the presentation of an educational activity, the provider will disclose the following:
    - i. Name of the individual;
    - ii. Name of the commercial interest(s) including a statement of disclosure if no relevant financial relationship(s) exist;
    - iii. Nature of the relationship the person has with each commercial interest;
    - iv. Source of all support from commercial interests who supplied financial grants or 'in-kind' support for the CE activity
    - v. Limitations on information, including, but not limited to: data that represents ongoing research; interim analysis; preliminary data; unsupported opinion; or approaches to care that, while supported by some research studies, do not represent the only opinion or approach to care supported by research.
  - c. Resolution of Conflicts of Interest - If a speaker or planner reports a conflict of interest on the disclosure form, the CPE office will initiate resolution. The CPE Chairman or appropriate representative(s), as determined by the chairman, will review the nature of the conflict of interest, and may review the activity content, to determine an acceptable resolution, which may include:
    - i. no further action required - the potential conflict reported does not influence the content of the activity
    - ii. requesting the speaker be replaced
    - iii. limiting a planner's involvement to a portion of the content; or
    - iv. revising the content of the activity.
11. Program Content - Information provided will be based on scientific principles generally accepted by the medical community. If a speaker's presentation contains discussion of unlabeled or investigational use of any product, they are informed that they must disclose that information to the audience.
  12. Banner Policies - Compliance with pertinent Banner Health policies and guidelines is required.
  13. Agreements - Appropriate written agreements will be executed with speakers, industry or other commercial entities, as required by Banner Health policies.
  14. Location – Activities will be held at locations appropriate to support an educational activity.
  15. Activity Announcements should be provided in advance providing learners with adequate and timely information regarding CPE programs or activities and will be in compliance with ACPE policies and procedures.
- D. ADMINISTRATIVE**
1. **Record Keeping**
    - a. All records will be maintained and kept available for a period of not less than 6 years.
    - b. Record keeping will be in compliance with ACPE Policy and Procedures



- c. Records may be shared with state boards of pharmacy when investigating a participant's continuing education compliance.
  - d. Confidentiality – Records will be maintained in accordance with Banner Policy. Internet education will contain specific confirmation defining how confidentiality will be maintained.
2. **Food and Drink**
- a. Refreshments will be reasonable, customary, and consistent with other Banner policies and in keeping with the circumstances of the event
  - b. For activities with commercial support, under no circumstance should social events occur or meals be served **during** the educational activity.
3. **Assignment of CEUs**
- a. The number of contact hours or CEUs to be awarded for participation and successful completion of an activity shall be determined by the provider in advance of offering the activity and comply with the requirements set forth for the types of CPE activities.
  - b. Determination of credits approved, including those granted for home study, will comply with ACPE Policy and Procedure Standards.
    - i. 60 minutes of credit equates to 1 contact hour (0.1 CEU)
  - c. Use of one Universal Activity Number (UAN) for a multi-hour activity is discouraged and requires prior approval from the Banner Health CPE administrator.
    - i. In the case where the administrator approves one UAN for a multi-hour activity, credit will only be issued in increments of one hour and participants will be required to validate participation by obtaining a participation code given during the live session and recorded on the evaluation form.
    - ii. Ability to obtain partial credit and requirements thereof will be disseminated prior to the activity.
4. **Joint or Co-Sponsorship** - Banner Health may partner with other accredited or non-accredited organization or organizations to develop and joint-sponsor educational activities.
- a. When Banner is the only accredited organization, Banner takes full responsibility for planning, development, promotion, delivery, evaluation and revision and may delegate related duties. Potential partnerships will be considered by the CPE Accreditation Board Chairman, on a case by case basis. The primary consideration will be whether the partnership is in alignment with Banner Health's strategic direction.
  - b. Joint-sponsored activities will comply with the following:
    - i. Banner will maintain responsibility and the non-accredited entity will be accountable for handling of funds, subject to requirements listed under "*Funding.*"
    - ii. A projected budget must be submitted with the application. Banner CPE representatives will review and approve the management of funds during the planning process.
    - iii. A report of income and expenses must be provided at the completion of the event, and upon request during the planning process.



- iv. Commercial Support Agreements will be between Banner Health and the commercial entity. Commercial interests cannot be accredited providers and cannot be cosponsors. To maintain CPE activities as independent from commercial interests, the following cannot be in the hands of a commercial interest:
    - 1. control of identification of CPE needs
    - 2. determination of educational objectives, selection and presentation of content
    - 3. selection of all persons and organizations that will be in a position to control the content of the CPE
    - 4. selection of educational methods
    - 5. evaluation of the activity.
  - v. Banner Health's name and logo must appear prominently on all promotional materials.
  - vi. All CPE activities will comply with Accreditation Standards for Continuing Pharmacy Education and will be documented in writing.
  - vii. A Co-sponsorship agreement is required and at minimum it will clearly define the working relationships between parties; include completion dates for various tasks; and recourses in the event that the parties involved fail to meet their responsibilities. Since non ACPE-accredited organizations cannot assume responsibility for compliance with ACPE standards, the agreement will explicitly document Banner's responsibility to assure compliance.
5. **Regularly Scheduled Series (Grand Rounds; tumor boards)** – One application will be submitted for a series of regularly scheduled sessions. General objectives will be developed to support the goal of the series. Specific objectives will be developed for each session and will correlate with the goal of the series, with the exception of case-based series. Monitoring - The Banner CPE administrator will monitor activities to ensure ongoing fulfillment of CPE requirements.
6. **Funding**
- a. Funds may be provided from a variety of sources, and may never have “strings attached”, (i.e., funding sources will have no influence over topic, content or faculty selection.)
  - b. Income and Expenses will be clearly accounted for.
  - c. Banner CPE, or other department(s), budgeted funds may be used to decrease registration fees.
  - d. Any honoraria or expense paid will only be provided in direct support of the work required to prepare and deliver the specific education activity. No support will be provided to learners or other non-faculty/ non-author participants.
  - e. Commercial Support - Unrestricted grants or fees for exhibit space may be accepted from commercial entities, subject to Banner policies that apply. Important points include:
    - i. Banner Health maintains control of the content and production of the activity.
    - ii. Commercial entities may not pay honorarium or any expenses directly to anyone involved in the planning or execution of the event. All payment to individuals involved in the development and/or execution of the event must



be paid by the provider or provider designee. In no circumstances will payment be accepted by anyone involved in the planning or implementation of and educational activity.

- iii. An agreement must be signed between Banner and the commercial entity. A commercial supporter's standard agreement may be acceptable if it correlates with the stipulations of Banner's commercial support agreement.
- iv. Commercial displays will not interfere with the educational activity (planning, presentation or be contingent on receiving support funding)
- v. Commercial interests will not engage in sales/marketing/promotion during the educational activity
- vi. Only non-educational materials may contain promotion and/or product specific advertisements
- vii. A commercial interest may not provide CPE activities to learners during the education event.
- viii. Commercial support should be in the form of an unrestricted grant.
- ix. Participants will not be manipulated into interaction with commercial entities.
- x. Promotional activities are not allowed in the meeting room(s) or directly outside the room immediately before or after the activity. This includes commercial representatives actively engaging meeting participants for promotional purposes.
- xi. All records for commercial support received and expended will be kept for a minimum of 6 years and will be made readily available for auditing purposes.

**7. Statements of Credit**

- a. Only signed credit statements will be distributed to participants.
- b. All statements of credit, whether printed or electronic, will include informational items in compliance with ACPE Policy and Procedures
- c. Statements of credits will be distributed immediately after the completion of the activity. If immediate distribution is not possible, it may be acceptable to ship statements up to 7 business days after completion of the activity. If immediate delivery is not feasible, the time line for the statement of credit delivery should be stated in the promotional material.
- d. Any statement of credit should use the word, "granted" to describe the number of credits issued.

**8. Provider Web Tool**

- a. The Provider Web Tool will be utilized to; update Activity Description Forms, update contact information using the Provider Verification Form and submit activity information using the Annual Activity Update Form.
- b. Banner Health will comply with all requirements pertaining to the Provider Web Tool as outlined in ACPE Policy and Procedures including, but not limited to change in administrator, submission of activity description forms, assignment of universal activity numbers and annual activity updates.

**9. Changes In Organization Name, Merger or Substantive Changes**

- a. ACPE's definition of substantive change includes, but is not limited to:
  - i. Any change in the established mission or goals of the provider;





- ii. Change in the legal status, governance, ownership or resources of the program;
  - iii. Change in CPE administrator;
  - iv. Change in supervisor;
  - v. Change in organizational structure;
  - vi. Any other changes that the CPE administrator feels require notification of ACPE.
- b. Organization Name Change or Merger or Substantive change as defined by ACPE Policy and Procedures will be reported to ACPE in accordance with ACPE policy guidelines.
- 10. Quality Plan**
- a. The Banner Health CPE program will be self evaluated annually utilizing the ACPE self assessment tool. The mission and goals will be evaluated annually.
  - b. The Banner Health CPE Granting Board will document in the minutes at least twice a year a self-evaluation of the program's success in achieving its mission and goals with supportive evidence (number of programs, types of programs, and comments from participants.) In addition, a summary of overall participant satisfaction will be reviewed utilizing data collected from activity evaluations. This information will be broken out by activity category (knowledge based versus application based) as to allow for individual improvement in either domain.
  - c. Information provided by the participants regarding topics for education will be reviewed at each meeting for merit and inclusion in the gap analysis.

### **Procedure/Interventions:**

- A. Banner Health CPE Administrator processes applications for CPE across the system. Where applicable, facility CPE contact or staff initially reviews the application according to criteria listed under *Section II.C.*, and submits the completed application to the CPE Administrator for final review and inclusion on the agenda of a CPE Accreditation Board meeting.
- B. Banner Health, the ACPE accredited provider, has authorized the CPE Granting Board (CPE GB) to designate credit for educational activities.
  1. Meeting times and constituency of the membership are managed by the CPE Administrator.
  2. The CPE AB Chairman (if unavailable, the Vice-Chair or acting chairman) serves as the final authority in decisions related to credit approval.
  3. The Chairman or Vice-Chairman, the CPE Administrator and another member of the CPE AB may review and approve credit outside a formal committee meeting, if the situation necessitates, provided the activity meets the criteria listed in this policy. The approved activity will be presented at the next CME AB meeting.
- C. Activity directors and coordinators are responsible for providing all required documentation as described in the application. This would include, but is not limited to:
  - needs assessment data (relevant to quality and performance gaps)
  - faculty confirmation and letters of agreement
  - commercial support agreements



- faculty and steering committee disclosure information
  - evaluation questionnaires and responses
  - registration and sign-in forms
  - projected budget and accounting of actual income and expenses.
- C. Record Keeping
1. Every effort will be made to maintain all documents electronically on a backed up Banner Health secure server.
  2. Any documents that cannot reasonably be scanned will be archived to a central document storage and be accessible within 5 business days or less. These documents will be maintained for a period of not less than 6 years.
- D. Changes In Organization Name, Merger or Substantive Changes
1. Based on ACPE guidelines, the CPE Administrator will determine if a change warrants communication to ACPE.
  2. Guidance from the current ACPE Policy and Procedures can be found at <http://www.acpe-accredit.org/ceproviders/CEpolicies.asp>

#### **IV. Procedural Documentation:**

- A. Application for Continuing Pharmacy Education Credit
- B. Co-sponsorship and or commercial support agreement

#### **V. Additional Information:**

- A. The Pharmaceutical Research and Manufacturers of America (PhRMA): *Code on Interactions with Healthcare Professionals*, July 1, 2002
- B. Food and Drug Administration: *Final Guidance for Industry*, 1997
- C. DHHS Office of Inspector General: *OIG Compliance Program Guidance for Pharmaceutical Manufacturers 2003*
- D. Joint Commission on Accreditation of Healthcare Organizations, MS.5.10

#### **VI. References:**

- A. ACPE -CPE Policies and Procedures Manual |Version 2.0 – Approved June 2008; Updated Feb 2009, June 2010

#### **VII. Other Related Policies/Procedures:**

- A. Sponsored Training and Education Policy
- B. Contract Review Policy
- C. Business Gifts Policy
- D. Business Courtesies, Meals and Entertainment Policy
- E. Business Travel and Expenses Policy
- F. Confidentiality Policy

#### **VIII. Keywords and Keyword Phrases:**

- A. Education, pharmacy
- B. Education, pharmacists, pharmacy technicians

#### **IX. Appendix:**



A. N/A