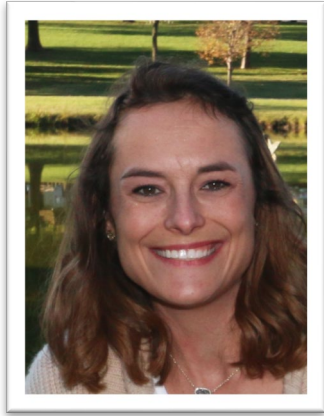


# AAFP Audit Webinar: The Why and What

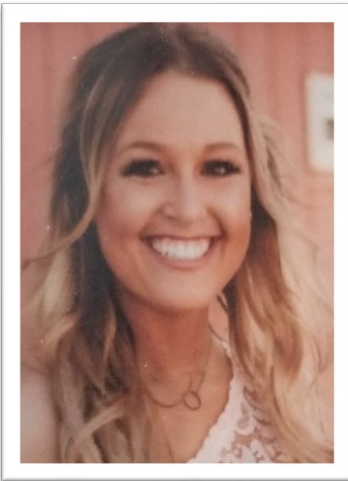
Leslie Christy  
October 22, 2019

# Introductions



**Leslie Christy (presenter)**

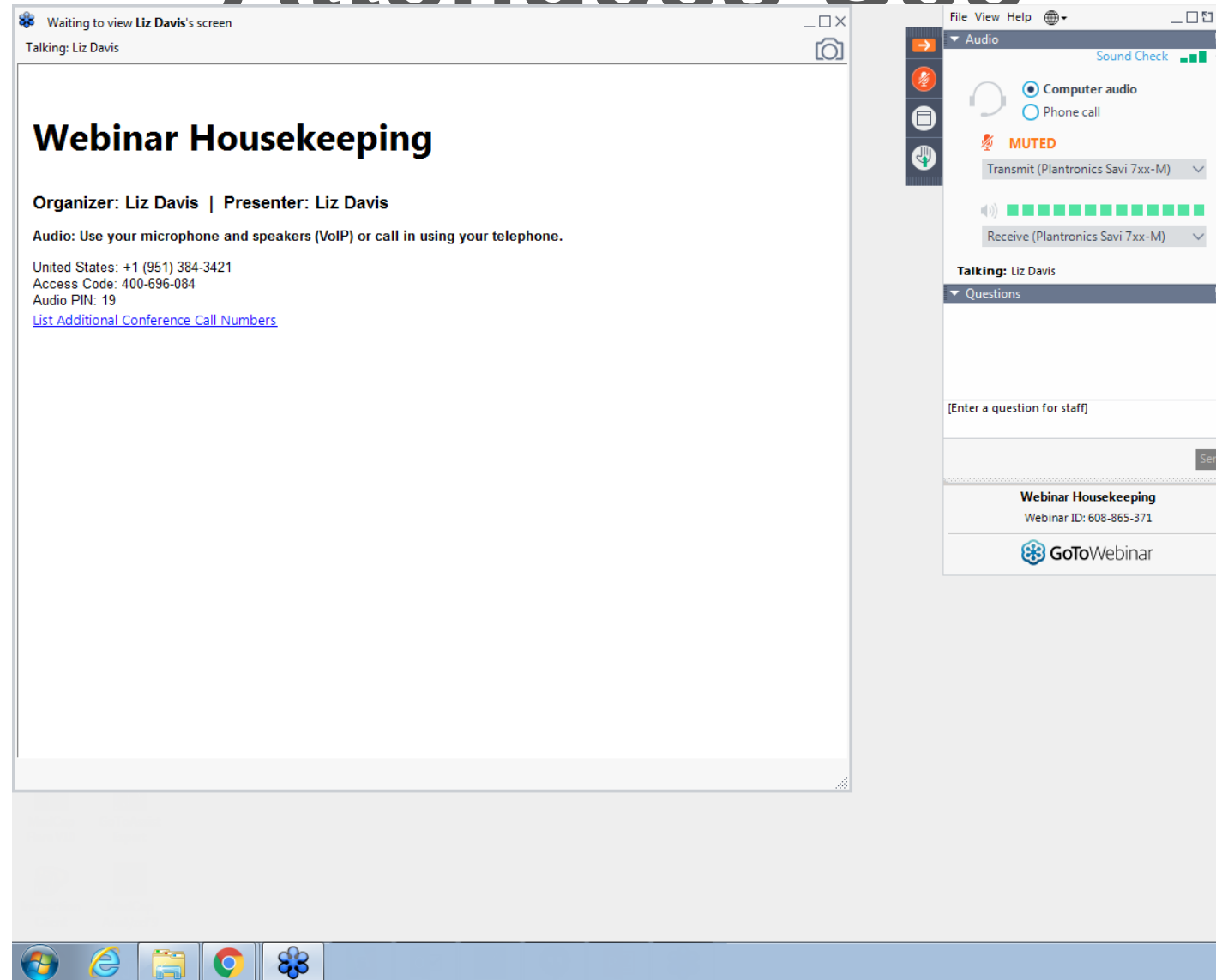
- AAFP, AAFP Credit System Specialist



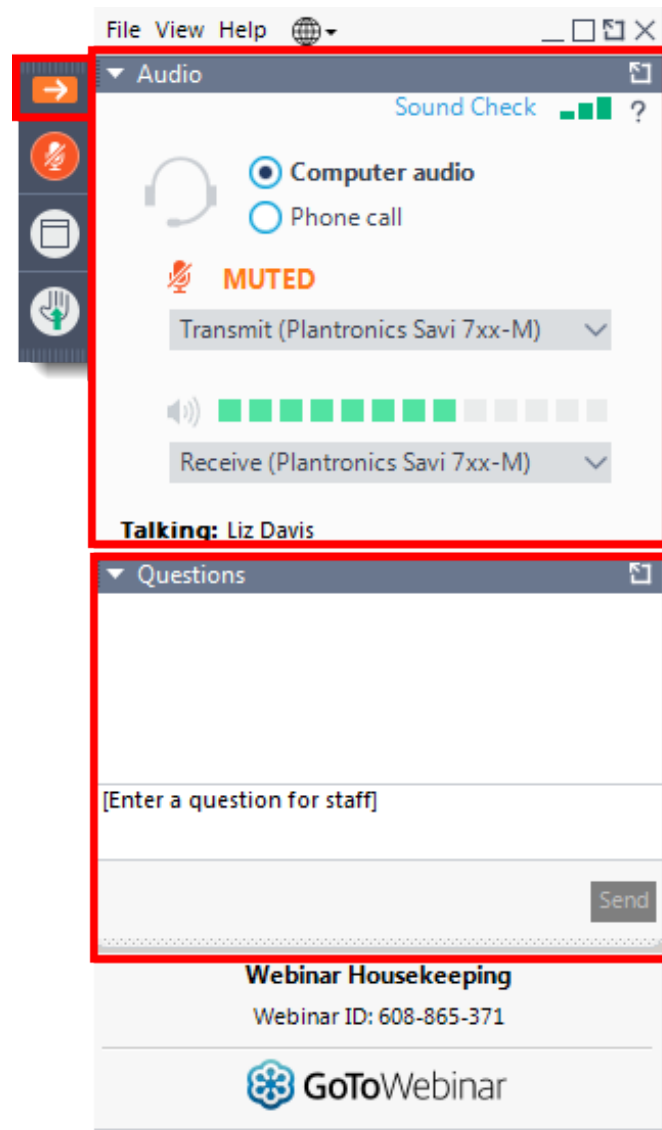
**Jolene White (moderator)**

- AAFP, AAFP Credit System Specialist

# GoToWebinar Housekeeping: What Attendees See



# GoToWebinar Housekeeping: Attendee Participation



## Participation

Open and close your control panel

Join audio:

- Choose **Mic & Speakers** to use VoIP
- Choose **Telephone** and dial using the information provided

Submit questions and comments via the Questions panel

**Note:** Today's presentation is being recorded and will be provided later this month.

# Learning Objectives

As a result of this webinar, you will be able to:

- Describe the purpose of AAFP Credit System audits
- Explain why your activity has been selected for an audit and the process for fulfilling the audit request
- Identify the necessary materials required in an audit and review examples of acceptable materials

# Purpose of AAFP Audits

- Application attestation
- Ensure quality CME
- Compliance with AAFP's eligibility requirements and criteria
- ACCME's *Standards for Commercial Support*
- Educational rather than punitive



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AAFP Eligibility Requirements: <https://www.aafp.org/cme/creditsys/about/eligibility.html>

ACCME's Standards for Commercial Support: <http://www.accme.org/accreditation-rules/standards-for-commercial-support>

# Types of Audits

## Random



- Majority
- Up to 1 year after approval
- CME provider not audited within the last year

## Complaint



- Credit System notified of concern
- CME provider is notified of complaint and concerns.

## Live



- Random or complaint
- CME provider is notified prior to activity



# Audit Process

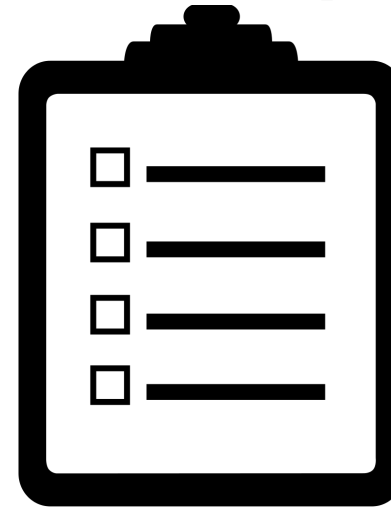
## Notification



Acknowledge

5 days

## Audit Report



Submit via portal



30 days

## Review



60 days



# Audit Materials

## AAFP Requirements

- All CME activity content (agenda, brochure, handouts, slide decks, etc.)
- Credit statement & credit seal on materials
- Activity and learner evaluation
- Activity planning documentation

## ACCME Standards

- Conflict of Interest (COI) Policy
- Blank content controllers COI Disclosure form
- Disclosure to learners
- Letters of Agreement (LOA)

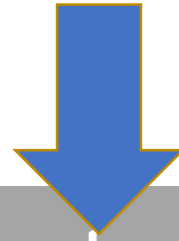
Complete list can be found at <https://www.aafp.org/cme/creditsys/about/audits.html#checklist>

# Compliance Criteria



## Total Compliance

- Documents and procedures meet AAFP requirements and ACCME Standards



## Substantial Compliance

- Provided all requirements
- Minor modifications to bring activity into total compliance



## Non-compliance

- Not all requirements provided, and/or
- Multiple areas where improvement is needed

# Action Plan

- Substantial or Non-compliance
- Action Plan to maintain eligibility
  - Update documents and/or procedures
  - 2 weeks
- No Action Plan provided
  - Suspension of eligibility
  - Activities Pending Review will not be reviewed



# Areas of Non-compliance

AAFP Credit  
Statements or  
Credit Seal

Documenting  
COI Disclosures  
from ALL content  
controllers

Documentation  
of resolved  
conflicts

Disclosing  
conflicts of  
interest, or lack  
thereof

Use of logos or  
brand names of  
a commercial  
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interest



# Example Random Audit

Dear Jolene White:

The American Academy of Family Physicians (AAFP) is committed to assuring that appropriate quality continuing medical education (CME) is available to the nation's family physicians. As a national credit system, the AAFP monitors and enforces compliance with current regulations governing CME, such as the Accreditation Council for Continuing Medical Education (ACCME) *Standards for Commercial Support of Continuing Medical Education*, which the AAFP has adopted as its own policy. The primary purpose of these regulations is to ensure independence, balance, and absence of commercial bias in CME supported by industry funding.

The **Live activity, Annual Spring Conference**, held on **05/20/2019** has been selected for an audit.

If you have questions, please contact us at 800-274-2237. Please [visit the AAFP Credit System audit documentation system](#) within 5 business days from the date of this letter to acknowledge you have received this AAFP audit notification. You will have up to 30 days from the date of this notification to submit the information requested on the checklist included. You may also access the audit documentation system through your [CME Provider Dashboard](#), which will include a hyperlink next to the selected activity under the Audits column.

Thank you for assisting the AAFP in assuring the provision of quality CME activities to meet the needs of the nation's family physicians.

Sincerely,

AAFP CME Credit System  
American Academy of Family Physicians  
11400 Tomahawk Creek Parkway | Leawood, KS 66211  
Office 800-274-2237  
[cmecredit@aafp.org](mailto:cmecredit@aafp.org)

Acknowledge  
Hyperlink



Application # 82639

The provider has submitted documentation for 82639 [Annual Spring Conference](#)

**Audit Documentation Submitted:**

- Audit Checklist Report
- Audit Checklist Report 1



# Example Continued

- Credit statement used incorrectly



The poster features a stethoscope and a family icon at the top. The text includes 'bergen.com', 'Annual Spring Conference', 'COME AND LEARN', 'Registration 8:00am', 'Keynote Address 9 am', and a blue sidebar with 'Conference provided by Family Clinic' and 'Accredited by AAFP for 5.50 CME credits'.

bergen.com

## Annual Spring Conference

COME AND LEARN

Registration  
8:00am

Keynote Address  
9 am

Conference  
provided by Family  
Clinic

Accredited by  
AAFP for 5.50  
CME credits

CERTIFICATE OF PARTICIPATION	
This certifies that:	
_____	
(Name of Physician Participant)	
has participated in the educational activity entitled:	
_____	
(Title of CME Activity)	
provided by: _____	
(Name of CME Provider)	
_____	_____
(Date of Activity)	(City/State of Activity)
and is awarded up to _____ credits.	
Annual Spring Conference was accredited by AAFP for 5.50 CME credits.	
I participated in _____ credits of this CME activity.	_____
	Signature of CME Activity Director

# Example Continued

## Activity Director

- Mary Masters

## Planning Committee

- Tyrone Adams
- Emma Jones
- Mary Masters
- Casper Sutherland



## Faculty

- Tyrone Adams, DO  
*Family Health Clinic*
- Monique Montague, RN  
*Family Health Clinic*
- Surrendhar Saleem, MD  
*Family Health Clinic*
- Brenda Walsh, MD  
*University of Kansas- Department of Family Medicine*

- No evidence of disclosure to learners

Last Name	First Name	Role(s) within the CME Activity	COI Form Completion Date	List Any RELEVANT Financial Relationship(s) and the Nature of Each Relationship	Mechanism(s) Implemented to Resolve All Conflicts of Interest Prior to the Activity
Adams	Tyrone	Planning Committee/Faculty	04/05/19	None	
Jones	Emma	Planning Committee	04/05/19	None	
Masters	Mary	Activity Director/Planning Comm	04/05/19	None	
Montague	Monique	Faculty	04/08/19	None	
Saleem	Surrendhar	Faculty	04/07/19	Speaker's Bureau: Merck; Stocks: Johnson drugs. Slides updated and approved on 5/15/2019	Peer review by Tyrone Adams on 5/06/2019. Requested slide 5 remove pictures of brand name
Sunderland	Casper	Planning Committee	04/05/19	None	
Walsh	Brenda	Faculty	04/08/19	Advisory Board: AstraZeneca	Peer review by Tyrone Adams on 05/08/2019. Did not find any content bias. Approved.

# Example Audit Complete

## Findings: Non-compliant

8/13/2019

Application # 82639

Dear Jolene White

Thank you for responding to the AAFP CME Credit System audit of the activity titled Women's Conference Online Module held on 1/1/2018 which was awarded 60.00 Prescribed credits. The audit has been completed and this activity has been determined to be non-compliant. A non-compliant finding means the documentation you submitted to us indicates several areas where improvement is needed, or one or more major areas of non-compliance with AAFP CME Credit System rules. In reviewing the documentation, the elements that require improvement include:

#### AAFP Criteria

- Use of AAFP Credit Statement

#### ACCME's Standards for Commercial Support

- Standard 6: Disclosures Relevant to Potential Commercial Bias

The attached [AAFP Audit Summary Report](#) provides details, recommendations and requirements on how to resolve the CME activity audit findings. You may also access this report through your [CME Provider Dashboard](#). Please provide a written action plan including completion deadlines, addressing the AAFP's requirements and recommendations. The audit action plan must be submitted to my attention, via email, at [cmecredit@aafp.org](mailto:cmecredit@aafp.org) no later than 8/27/2019 .

Thank you for your cooperation during this audit. Please contact us if you have any questions or concerns.

Sincerely,

AAFP CME Credit System

Audit Element	Findings (Compliant, Non-Compliant, N/A)	Notes (explanation)	Requirements and Recommendations
<b>AAFP Criteria:</b>			
Application Consistency	Compliant	Compliant	N/A
Use of AAFP Credit Statement	Non-Compliant	Audit documentation includes a modified credit statement on the brochure and evaluation.	Action Plan: Please attest to using the AAFP credit statement as provided in the approval email. Please include a copy of a certificate with the proper credit statement.
AAFP Member Involvement	Compliant	Compliant	N/A
Evaluation and Improvement	Compliant	Compliant	N/A
	Compliant		
<b>Compliance with ACCME's Standards for Commercial Support:</b>			
Standard 1: Independence	Compliant	Compliant	N/A
Standard 2: Resolution of Personal Conflicts of Interest	Compliant	Compliant	N/A
Standard 3: Appropriate Use of Commercial Support	Compliant	Compliant	N/A
Standard 4: Appropriate Management of Associated Commercial Promotion	Compliant	Compliant	N/A
Standard 5: Content and Format without Commercial Bias	Compliant	Compliant	N/A
Standard 6: Disclosures Relevant to Potential Commercial Bias	Non-Compliant	Audit documentation did not reflect how all content controllers disclosed conflict(s) of interest (or lack thereof) to the learners prior to the education.	Action Plan: Please provide your policy and procedures with disclosing conflicts of interest (or lack thereof) of all content controllers to the learners prior to the education.

ACCME's Standard 6 <http://www.accme.org/accreditation-rules/standards-for-commercial-support/standard-6-disclosures-relevant-potential>



Cre

## Family Clinic CME Policy and Procedures for Managing Conflicts of Interest

The following policy governs all Family Clinic produced CME activities:

Any individual in a position to control content must disclose, in writing to the CME Provider, the existence of any financial relationships with a commercial interest within the past 12 months. The ACCME defines a commercial interest as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Disclosure information must be received and reviewed by Family Clinic prior to confirmation of the individual's participation. Any conflicts of interest must be identified and resolved by the Family Clinic prior to the individual's confirmation as an activity planner, faculty author, or other content controlling role. The ACCME's definition of conflict of interest is 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. It is necessary to update disclosure information should the status change during the course of the CME activity.

The intent of this policy is not to prevent individuals from participating, but rather to identify and resolve any conflict of interest. Should resolution be impossible, a replacement for the individual must be chosen.

The review, identification, and resolution process must take place prior to the activity; all individuals in a position to control content must return the disclosure information by the due date. Failure to disclose within the necessary timeframe will result in withdrawal of the invitation. The disclosure information will be reviewed, and should a potential conflict be identified, additional information or dialogue may be required.

Acknowledgement of all relevant disclosures—i.e., nothing to disclose or existence of affiliation(s), and/or financial relationship(s) or interest(s)—for every individual who serves in a position to control content of the educational activity must be presented to the learners in writing prior to presentation or publication.

Failure or refusal to disclose, false disclosure, or inability to work with the Family Clinic to resolve an identified conflict of interest will result in withdrawal of the invitation to participate and replacement of the individual.

dit System  
2 weeks

# Example Audit Closed

- Action Plan addresses non-compliant areas
- Accepted by Credit System
- Letter indicating audit closed
- Maintain eligibility to apply for AAFP credit



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Friday, October 11, 2019

Bob Jones  
Family Clinic  
1140 W. State Ave  
Leawood, KS 61141

Dear Bob Jones,

We have reviewed and approved all of the materials you submitted to fulfill the Recommended Action Plan. You have demonstrated that you have corrected the deficient areas within your activity and processes, and you are in good standing with the AAFP CME Credit System and retain your eligibility to apply for AAFP CME credit.

We appreciate your cooperation with this audit and we look forward to working with you in the future.

Please do not hesitate to contact us should you have further questions.

Sincerely,

AAFP Credit System

# Contact Info & Resources

- AAFP Audit Information:  
<https://www.aafp.org/cme/creditsys/about/audits.html>
- ACCME's Standards for Commercial Support:  
<http://www.accme.org/accreditation-rules/standards-for-commercial-support>
- ACCME's Definition of a Commercial Interest:  
<http://www.accme.org/accreditation-rules/policies/definition-commercial-interest>
- Conflict of Interest Webinar:  
<https://www.aafp.org/cme/creditsys/about/tutorials/webinar-conflict-interest.html>
- AAFP Audit Checklist (Audit Report access)  
<https://www.aafp.org/cme/creditsys/about/audits.html#checklist>

**Contact Us** | [cmecredit@aafp.org](mailto:cmecredit@aafp.org) | 800-274-2237







THANK  
YOU

<https://www.aafp.org/cme/creditsys/about/tutorials.html>

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AMERICAN ACADEMY OF FAMILY PHYSICIANS

**STRONG MEDICINE FOR AMERICA**