



## UBC CONTINUING PROFESSIONAL DEVELOPMENT (UBC CPD) PROCEDURES FOR NON- COMPLIANCE IN CPD ACTIVITIES

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The primary purpose of CME/CPD activities is “to address the educational needs of physicians and other health care providers to improve the health care of patients” (CMA Policy, Guidelines for Physicians in Interactions with Industry, 2007). To meet this goal, the National Standard was created to “safeguard high-quality CPD from commercial influence” (Royal College, 2018). In considering element 2.4 within the new National Standard which states “The scientific planning committees (SPC) is accountable for accredited and/or certified CPD activities must comply with the National Standard and have a process in place to deal with instances where CPD activities are not in compliance with the National Standard” the following procedures have been created in order to have an existing process at the UBC Division of Continuing Professional Development (UBC CPD) in accordance with this element of the National Standard.

The document below outlines the steps for SPCs to take to identify and address non-compliance with the National Standard, as well as the actions UBC CPD will take as the accredited-provider when a contravention is identified at an accredited and/or certified CPD activity. It should be noted that these procedures are in place for the CPD activities in which UBC CPD that has direct involvement in terms of development, provision and/or accreditation. The procedures outlined in the document will be put into action in a manner consistent with the seriousness of the contravention.

### Identifying and Addressing Non-Compliance and the role of the Scientific Planning Committee (SPC)

- A. All SPC members should be familiar with the UBC CPD Guidelines for Support of Accredited Activities (based on the National Standard) to be able to identify non-compliance.
- B. All SPC members should be aware of the disclosed financial relationships of the other SPC members, presenters, facilitators, instructors and authors. Any discrepancies between the information on the disclosure form and the actual presentation are one way to identify contraventions with the National Standard.
- C. All sponsors of an accredited/certified activity must have signed an agreement with the physician organization outlining the sponsorship opportunities permitted for that event (table in exhibit hall, number of representatives attending, etc.). Deviations from this agreement such as



selling in the live educational sessions or participating in accredited/certified discussion time onsite is another example of non-compliance that the SPC might identify.

The SPC may decide to address any issue of non-compliance with the individual (i.e. speaker or company representative) or company directly at the time of the initial infraction and decide on an appropriate course of action to manage and mitigate the issue. To formally address and assist with tracking of persistent or aggressive non-compliance, UBC CPD leadership should be consulted by the SPC should any instances arise in order to decide on the next steps in terms of mitigation and resolution and how the non-compliance procedures below should be applied.

## Non-compliance for UBC Faculty of Medicine CPD activities

*UBC CPD only certifies activities for CFPC Mainpro+ credits provincially within the UBC Faculty of Medicine (FoM). Therefore, all activities approved for Mainpro+ credits by UBC CPD are UBC FoM Activities. MOC-approved activities are considered UBC FoM Activities when the physician organization is a UBC FoM Department.*

- I. A written warning will be issued to the accountable UBC FoM Department who must provide evidence of amendments and respond to the warning with details on how they will take steps to ensure compliance with UBC CPD Guidelines.
- II. If the violation is deemed to be significant in nature (e.g. sponsor influencing content development, sponsor presenting within accredited/certified program), a referral will be made to any or all of the following: UBC CPD Advisory Committee, UBC Faculty of Medicine Department Heads, the UBC Faculty of Medicine Dean's Office, Royal College of Physicians and Surgeons of Canada and the College of Family Physicians of Canada in order to determine the appropriate action, which may include but not be limited to one or more of the following:
  - i. Revoking accreditation/certification (i.e. attendees cannot claim credits for participation);
  - ii. A one year suspension, during which time no new activities may be submitted for accreditation/certification;
  - iii. A three-year tracking process during which the program is monitored and audited to observe whether the necessary changes are taking place and there is full compliance with UBC CPD guidelines

## Non-compliance for non-UBC CPD Activities

*UBC CPD accredits activities for Royal College MOC credits nationally. Activities approved for MOC credits by UBC CPD are considered non-UBC activities when the physician organization is not a UBC FoM Department.*

- I. A written warning will be issued to the accountable physician organization who must provide evidence of amendments and respond to the warning with details on how they will take steps to ensure future compliance with UBC CPD Guidelines.



- II. If the violation is deemed to be significant in nature (e.g. sponsor influencing content development, sponsor presenting within accredited/certified program), the case will be discussed with the Royal College of Physicians and Surgeons of Canada in order to determine the appropriate action, which may include but not be limited to one or more of the following:
  - i. Revoking accreditation (i.e. attendees cannot claim credits for participation);
  - ii. A three-year tracking process during which the program is monitored and audited to observe whether the necessary changes are taking place and there is full compliance with UBC CPD guidelines
  - iii. Undetermined suspension, during which time no new activities may be submitted for accreditation;
  - iv. A written complaint submitted about the organization to their larger body (if applicable) that has ethical codes of practice;
  - v. A written complaint submitted about the organization to the other University CPD provider Offices across Canada and relevant National Speciality Societies.

## References

Canadian Medical Association. (2007). Guidelines for Physicians in Interactions with Industry. Retrieved from <https://www.cma.ca/En/Pages/physician-industry-interaction.aspx>

Royal College of Physician and Surgeons of Canada. (2018). National Standard for Support of Accredited CPD Activities. Retrieved from <http://www.royalcollege.ca/rcsite/cpd/providers/tools-resources-accredited-cpd-providers/national-standard-accredited-cpd-activities-e>

UBC CPD Guidelines for Support of Accredited and Certified CPD Activities  
<https://ubccpd.ca/accreditation/sponsorship#Guidelines>