

<u>SUBJECT</u> Honoraria Policy, Procedures, and Guidelines	<u>EFFECTIVE DATE</u> December 19, 2006 <u>REVISED</u> May 24, 2012
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Purpose

This policy outlines the payment of honoraria for contributors to CME activities certified by Harvard Medical School (HMS). This policy is established in accordance with requirement 3.7 of the ACCME’s *Standards for Commercial Support of Continuing Medical EducationSM: Standards to Ensure the Independence in CME Activities* (SCS). It covers all HMS-affiliated and non-HMS 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 Harvard Medical School (HMS) in conjunction with its affiliated teaching institutions, joint-sponsors and educational partners 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. Harvard Medical School 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 Harvard Medical School 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

Honoraria Estimation Procedures and Rate Guidelines

General Estimation Procedures:

- Honoraria will be determined collaboratively by the HMS Department of Continuing Education (DCE) and the Course Directors during the CME proposal process based on the ranges provided in this policy.

¹ See ACCME Standards 3.1 and 3.2.

² See ACCME Standards 3.8 and 3.9.

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

Guidelines for External (Non-HMS) 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 Faculty Dean for Continuing Education will review extraordinary rate requests for possible approval, and may seek counsel from the HMS Standing Committee on Continuing Medical Education.

Guidelines for HMS Speakers in Traditional Live Courses:

- As part of a faculty member's key responsibilities associated with their academic appointment, it is customary for HMS 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 HMS affiliated 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 DCE to process such bonuses to Course Directors, DCE 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 DCE 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 HMS, a Harvard teaching affiliate, a joint-sponsor or a designated educational partner; if commercial support is received by DCE for a specific activity, honoraria payments must be processed by DCE. 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 HMS DCE CME Activity Proposal and provide honoraria payments detail by individual.
2. The budget will be approved by the Department Chair (or his or her equivalent for jointly-sponsored activities).
3. After the CME activity has taken place, the Course Director or Course Administrator will submit honoraria payment requests through DCE.
4. DCE's Financial Coordinators will review payment requests and check them against the approved budget.
5. If a request deviates from the approved budget, DCE will request verification from 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 Faculty Dean for Continuing Education will provide further review.
7. DCE will process the approved honoraria requests for payment.

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 [Harvard University Financial Policy](#):

Travel:

- Domestic air travel: the lowest-priced, non-stop coach-class airfare.
- Canada, Mexico, Alaska, Hawaii, or U.S. Territories: the lowest-priced, non-stop business-class airfare available when a single, non-stop flight takes six (6) hours or more
- International air travel: the lowest-priced, non-stop business-class airfare available

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

³ See ACCME Standard 3.10.