

# Self Study for CME Accreditation

## Demonstrating the Implementation of ACCME/TMA Accreditation Criteria

Instructions and Outline
For providers receiving <u>accreditation decisions</u>
From Texas Medical Association
September 2014
(Self-study report due May 1, 2014)

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#### **Instructions for Completing the Self Study**

#### Conducting Your Self Study

The Self Study process provides an opportunity for the accredited provider to reflect on its program of CME. This process can help the organization assess its commitment to and role in providing continuing medical education and determine its future direction.

An outline of the content of the *Self Study Report* is specified by Texas Medical Association (TMA), but the process of conducting a *Self Study* is unique to your organization. Depending on the size and scope of your CME program, you may involve many or just a few individuals in the process. Regardless of the size or nature of your program, the *Self Study* is intended to address:

- The extent to which your organization has met its CME Mission (C1, C12).
- An analysis of factors that supported or detracted from the CME mission being met (C11, C12).
- The extent to which, in the context of meeting your CME mission, your organization produces CME that:
  - o Incorporates the educational needs that underlie the professional practice gaps of your own learners (C2),
  - Is designed to change competence, performance, or patient outcomes (C3),
  - o Includes content matched to your learners' current or potential scopes of practice (C4),
  - Includes formats appropriate for the setting, objectives, and desired results (C5),
  - o Is in the context of desirable physician attributes (C6),
  - Is independent, maintains education separate from promotion, ensures appropriate management of commercial support, and does not promote the proprietary interests of a commercial interest (C7-10).
- How implemented improvements helped your organization better meet its mission (C13 C15).
- The extent to which your organization is engaged with its environment (C16-C22).

#### **Resources to Support TMA's Accreditation Process**

TMA's accreditation process is facilitated by your use of the following documents and forms:

- 1. Applicant Agreement, Organizational Contacts, and Demographic Information Forms
- 2. CME Activity List
- 3. Performance in Practice Instructions
- 4. Performance in Practice Review Labels

You will receive electronic copies of these documents by e-mail during your accreditation process, and they are available on TMA's website at <a href="https://www.texmed.org">www.texmed.org</a> CME, For CME Providers.

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#### **Data Sources Used in the Accreditation Process**

The TMA's accreditation process is **an opportunity** for each provider to demonstrate that its practice of CME is in compliance with accreditation requirements. The TMA's accreditation process utilizes three primary sources of data from the provider's CME program:

- 1. Self-study report: Organizations are asked to provide descriptions, attachments, and examples to give the reader an understanding of CME practices(s) related to TMA/ACCME Criteria and Policies. Descriptions are narrative explanations. Attachments are specific documents. Examples are demonstrations of the implementation of the practices described that may include narrative and/or attachments.
- 2. Performance in Practice Review: Providers are expected to verify that their CME activities are in compliance with ACCME/TMA's Accreditation Criteria and Policies through the documentation review process. For reaccreditation, TMA will select up to 15 activities from the current accreditation term for which the organization will be expected to present evidence of performance in practice to the TMA for documentation review.

For **initial accreditation**, the organization will identify at least two completed CME activities that have been planned, implemented, and evaluated within the 24-month period prior to the initial accreditation interview.

3. Accreditation Interview: The interview presents an opportunity to describe and provide clarification, as needed, on aspects of practice described and verified in the self study report or activity files. Through dialogue with the TMA survey team, an organization may explain its practices in a more explicit manner. The survey team may request that a provider submit additional materials based on this dialogue to verify a provider's practice. TMA utilizes the onsite survey as its standard accreditation interview and file review format. However, TMA will consider a conference call option when circumstances result in a failure to negotiate an on-site meeting date or the location is difficult for surveyors to access.

#### **Expectations about Materials**

The materials submitted to TMA, in any format, must not contain any untrue statements, must not omit any necessary material facts, must not be misleading, must fairly present the organization, and are the property of the organization.

Materials submitted for accreditation (self study report, activity files, and other materials) must not include individually identifiable health information, in accordance with the Health Insurance Portability and Accountability Act (HIPAA).

## Outline for the Self Study Report For TMA Accreditation

#### I. Introduction

- A. Applicant Agreement, Organizational Contacts, and Demographic Information Forms (forms to complete can be found under CME Accreditation on www.texmed.org)
- **B.** CME Activity List a list of your CME activities for the current term of accreditation (form to complete can be found under CME, For CME Providers on <a href="www.texmed.org">www.texmed.org</a>; or, devise your own list using the same column headings as this form); or, notify TMA office that all of your activity data is in PARS
- C. Self Study Report Prologue
  - 1. Describe major aspects of your physician constituency: specialty distribution; geographical region in which they practice; any unique aspects of their patient populations; typical and unique types of care provided, etc.
  - 2. Describe a brief history of your CME Program
  - 3. Describe the leadership and structure of your CME Program.
    - i. Attach organizational chart for staff.
    - ii. Attach CME committee roster, including specialty or area represented.

#### II. Purpose And Mission (Criterion 1)

- **A. Attach** your CME mission statement.
- **B. Identify** and **highlight** each required component: (1) purpose, (2) content areas, (3) target audience, (4) types of activities, and (5) expected results of the program. **Include** evidence showing your governing body's most recent review and approval of the CME Mission.

Note: It is important that TMA can identify in the expected results section of your mission statement the changes that are the expected results of your CME program (i.e., changes in competence, or performance, or patient outcomes). (C1)

#### III. Educational Activities (Criteria 2-7 and Policies)

The next set of items is designed to gather information on your educational planning process.

Tell us the 'story' of how you develop continuing medical education. Pick  $\underline{two}$  of your CME activities as examples. If you accept commercial support, one of the examples should be an activity that used commercial support. Using these examples, within the context of your organization's processes and mechanisms,  $\underline{describe}$  all of the steps you went through to create these educational activities.

In your narrative for Section III the TMA will be looking for.

1.	The professional practice gap that the activities were addressing	(C2)
2.	The educational need(s) that you determined were underlying the gap(s) for your learners	(C2)

3.	What competence or performance or patient outcome the activity was designed to change.	(C3)
4.	How the activity matched the current or potential scope of professional practice (research, educational, administrative or clinical) of your learners.	(C4)
5.	Your explanation of why the format of the activity you chose was appropriate for the setting, objectives and desired results of the activity	(C5)
6.	The desirable physician attribute(s) you associated with the activity	(C6)
7.	The mechanism(s) your organization used to a) identify and b) resolve conflicts of	(C7
	interest for <u>everyone</u> in a position to control educational content <u>(i.e., teachers, authors, planners, reviewers, and others who controlled content).</u>	SCS2)
8.		(C7 SCS2)
8. 9.	authors, planners, reviewers, and others who controlled content).  A description of a planning process that was independent of the control of any ACCME-	(C7

(Note: Clearly separate the narrative for each example.)

#### Recording and verifying physician participation

- A) **Describe** the mechanism your organization uses to record and verify physician participation for six years from the date of your CME activities.
- **B)** Using the information from one of the example activities in Section III above, **show** the information or reports your mechanism can produce for an individual participant.
- IV. Regarding your Program of CME, your Educational Activities and the ACCME Standards for Commercial Support: Standards to Ensure Independence in CME Activities (Criteria 8-9)
- A) Attach your written policies and procedures governing honoraria and reimbursement of expenses for planners, teachers, and/or authors or enter here, "We do not provide honoraria in any form to planners, teachers, and/or authors." (C8 SCS 3.7-3.8)
- B) Attach your written policies and procedures governing reimbursement of expenses for planners, teachers, and/or authors or enter here, "We do not provide reimbursement of expenses in any form to planners, teachers, and/or authors." (C8 SCS 3.7-3.8)
- **C) Describe** what policy, procedure, or communications you employ to ensure that no direct payment from an ACCME-defined commercial interest is given to the director of an activity, any planning committee members, teachers or authors, joint sponsor, or any others involved in an activity. (C8 SCS 3.3; 3.9)
- D) Describe your process(es) for the receipt and disbursement of commercial support (both funds and in-kind support). (C8 SCS 3.1) or enter here, "We do not accept commercial support for any of our directly or jointly sponsored CME activities."
- E) Describe what policy, procedure or communications you employ to ensure that all commercial support is given with your organization's full knowledge and approval). (C8 SCS 3.3) or enter here, "We do not accept commercial support for any of our directly or jointly sponsored CME activities."

- F) Describe the practices or procedures or policies you have implemented to ensure that social events, or meals, at commercially supported CME activities cannot compete with or take precedence over educational events. (C8 SCS 3.11) or enter here, "We do not accept commercial support for any of our directly or jointly sponsored CME activities" or enter here, "We do not provide social events or meals for any of our directly or jointly sponsored and commercially supported CME activities."
- G) Do you organize *commercial exhibits* in association with any of your CME activities? If "No," write in this section, "We do not organize *commercial exhibits* in association with any of our CME activities." If yes, describe how your organization ensures that arrangements for commercial exhibits do not (1) influence planning or interfere with the presentation and (2) are not a condition of the provision of commercial support for CME activities. (C9 SCS 4.1)
- H) Do you arrange for advertisements in association with any of your CME activities? If "No, "write in this section, "We do not arrange for advertisements in association with any of our CME activities." If yes, describe how your organization ensures that advertisements or other product-promotion materials are kept separate from the education. In your description, distinguish between your processes related to advertisements and/or product promotion in each of the following types of CME activities: (1) print materials, (2) computer-based materials, (3) audio and video recordings, and (4) face-to-face. (C9 SCS 4.2, 4.4)

## V. Regarding the Content of your Continuing Medical Education Activities (Criterion 10 and Policy on Content Validation)

#### A) It is an expectation of the ACCME and TMA that,

The content of CME activities does not promote the proprietary interests of any commercial interests. (i.e., there is not commercial bias)	(C10 SCS 5.1)
CME activities give a balanced view of therapeutic options, and that	(C10 SCS 5.2)
The content of CME activities is in Compliance with the ACCME's content validity value statements	(Policy on Content Validation)

**ACCME's Policy on Content Validation:** All the recommendations involving clinical medicine in a CME activity must be based on evidence that is accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients. All scientific research referred to, reported or used in CME in support or justification of a patient care recommendation must conform to the generally accepted standards of experimental design, data collection and analysis. Providers are not eligible for ACCME accreditation or reaccreditation if they present activities that promote recommendations, treatment or manners of practicing medicine that are not within the definition of CME, or known to have risks or dangers that outweigh the benefits or known to be ineffective in the treatment of patients.

**Describe** how your CME activities and your program of continuing medical education ensure that these three expectations are fulfilled (e.g., planning, procedures, policy, monitoring).

#### VI. Evaluation and Improvement (Criteria 11-15)

TMA expects all providers to conduct an evidence-based self-assessment of the degree to which their CME Mission has been met.

**A. Provide** a program-based analysis explaining the degree to which each element of your CME mission, as highlighted in Section II (B), has been met through the conduct of your CME activities/educational interventions. Integrate into this analysis the evidence (i.e., the data or

information) on each element of your CME Mission upon which this analysis was based. Include data and information about changes in learners (competence, performance, or patient outcomes) achieved as a result of the overall program's activities/educational interventions. (C11 and C12)

The TMA expects that providers seeking reaccreditation will use the information described in Section VI (A), above, to identify opportunities, or areas, for improvements in the provider's CME activities or CME organization.

**B. Provide** a description of the areas, or opportunities, for improvement that you identified through your self-assessment described in Section VI (A), above. (C13) For each area, or opportunity, for improvement, specify what change you will be making to alter your self-assessment results. Indicate if the change is still planned for implementation, or if it has already been implemented. (C14) Describe the impact of implemented changes. (C15)

#### VII. Engagement with the Environment (Criteria 16-22)

**NOTE:** The information gathered through your organization's responses here will be used to determine eligibility for Accreditation with Commendation. All applicants must provide responses for each of these Criteria.

- A) If your organization integrates CME into the process for improving professional practice, **describe** how this integration occurs. Include **examples** of explicit organizational practices that have been implemented. (C16)
- B) If your organization utilizes non-education strategies to enhance change as an adjunct to its educational activities, **describe** the strategies that your organization has used as adjuncts to CME activities and how these strategies were designed to enhance change. Include in your description an explanation of how the non-education strategies were connected to either an individual activity or group of activities. Include **examples** of non-education strategies that have been implemented. (C17)
- c) If your organization identifies factors outside of its control that will have an impact on <u>patient outcomes</u>, **describe** those factors. Include **examples** of identifying factors outside of your organization's control that will have an impact on patient outcomes. (C18)
- D) If your organization implements educational strategies to remove, overcome, or address barriers to <u>physician change</u>, **describe** these strategies. Include **examples** of educational strategies that have been implemented to remove, overcome, or address barriers to physician change. (C19)
- E) If your organization is engaged in collaborative or cooperative relationships with other stakeholders, **describe** these relationships. Include **examples** of collaboration and cooperation with other stakeholders. (C20)
- F) If your CME unit participates within an institutional or system framework for quality improvement, **describe** this framework. Include **examples** of your CME unit participating within an institutional or system framework for quality improvement. (C21)
- **G)** If your organization has positioned itself to influence the scope and content of activities/educational interventions, **describe** organizational procedures and practices that support this. Include **examples** of how your organization is positioned to influence the scope and content of activities/educational interventions. (C22)

#### Structure and Format Requirements for the Self Study Report

The self-study report must be organized using divider tabs to separate the content of the report in the seven sections of the self-study report outline. For the purpose of printing tabs, the titles of the sections have been abbreviated as follows:

- I. Introduction
- II. Purpose and Mission (C1)
- III. Educational Activities (C2-7 and Policies)
- IV. CME Program and Educational Activities (C8-9)
- V. Content of Educational Activities (C10 and Content Validation)
- VI. Evaluation and Improvement (C11-15)
- VII. Engagement with the Environment (C16-22)

Print at least three sets of the above tabs (depending on number of extra copies.)

#### **Format Requirements**

- 1. The Self-Study Report must be organized using divider tabs as specified above.
- 2. Narrative, attachments, and examples must be provided as indicated in the Self-Study Report Outline.
- 3. Type with at least 1" margins (top, bottom and sides), using **11 point type or larger**. The topics from the Outline should be in **bold**, clearly separated from the type style (font) of your answers. It is acceptable to use double-sided printing.
- 4. **Consecutively number** each page in the binder including the attachments. Typed **or** hand-written page numbers are acceptable.
- 5. Include the following completed forms behind the "Introduction" Tab:
  - a) Applicant Agreement, Organizational Contacts, and Demographic Information Forms
  - b) CME Activity List
  - NOTE: The above forms are available on www.texmed.org CME, For CME Providers
- 6. Place the Self-Study Report and all the attachments in a three-ring binder 1 ½ -inch maximum ring diameter.
- 7. Submit **three** copies to TMA in three separate ring binders. Be sure to keep a separate copy for your use during the interview.

#### Ship Self Study Reports to:

Billie L. Dalrymple
Director, CME
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401 West 15<sup>th</sup> Street
Austin, TX 78701

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#### TMA's Review of a Provider's Performance in Practice

TMA's performance-in-practice review allows providers to demonstrate compliance with ACCME/TMA's expectations and offers providers an opportunity to reflect on their CME practices.

Materials that demonstrate compliance with TMA's expectations may result from work done for individual activities or as part of the overall CME program. Meeting minutes and strategic planning documents are two examples of materials that might help a provider show how an activity meets TMA's expectations with evidence not directly related to a specific CME activity. Providers must include such materials in labeled evidence to verify compliance.

#### Structure and Format Requirements for Performance in Practice Review

In order to facilitate TMA's review of providers' performance in practice as seen in activity files, providers must follow these three steps:

**STEP 1: Submitting your CME Activity List.** In your Self Study, you will submit a complete list of activities to the TMA that includes the following information:

Activity title

Date

Location

Sponsorship (direct or joint)

Type of activity (single, RSS, enduring and format, journal CME)

Number of hours

Number of MDs

Number of non-MDs

Amount of commercial support received

Number of commercial supporters

Designed to change competence?

Competence measured?

Designed to change performance?

Performance measured?

Designed to change patient outcomes?

Changes in patient outcomes measured?

An excel spreadsheet is available to facilitate listing and tracking this required data on the TMA's website at <a href="www.texmed.org">www.texmed.org</a> CME, For CME Providers; or devise your own list using the same column titles as this form. Providers should remember that:

- **For reaccreditation**, any activity that your organization offered, or plans to offer, under the umbrella of your TMA accreditation during its current term must be included on the list. Current term is defined as the month after your last accreditation decision through the expiration of your current term.
- Activities should be entered chronologically; first live courses, then enduring materials

- For organizations that produce **regularly scheduled series** (RSS): List RSSs by year and series. Do not list each daily, weekly, or monthly session. RSS is defined as daily, weekly or monthly CME activities that are primarily planned by and presented to the provider's own professional staff and are planned as one activity for the year. Use the date of the first session to fill in the date field. The total hours of instruction for the series is the sum of hours available through the activity during the year, and the total participants is the sum of the number of physicians/non-physicians attending each individual session.
- For activities that have not yet occurred, please use best available information. You will have the opportunity to update this information at the time of the interview.
- Activities offered on multiple dates at various locations to different audiences, even if
  they have the same title and content, must be listed for each date and location at
  which they were offered.

**PARS:** TMA-accredited providers began entering data into PARS in 2012. Providers have the option to back fill data for the current term of accreditation. The selection of activities for performance in practice can be facilitated in PARS, and therefore, would not require completion of the Excel spreadsheet as described above. Please let the TMA office know if you choose PARS for submitting activity data for the current term of accreditation.

**For initial accreditation,** this list should include data for at least two completed CME activities that have been planned, implemented, and evaluated within the 24-month period prior to the initial accreditation interview. This list should reflect only those activities that are being presented for review of performance-in-practice and planned and presented in compliance with TMA Essential Areas, Elements, and Policies.

#### STEP 2: TMA's Selection of Activities for Review

Based on the completed CME Activity List you include in your self study, TMA will select up to 15 files for review for reaccreditation. TMA will select a sample of your activities from this list from both 1) across the years of your accreditation term and 2) among the types of activities that are produced. If you produce enduring materials, journal CME, or internet CME activities, you are also expected to submit the CME product from the activities chosen for performance in practice review. These products will be reviewed for compliance with ACCME/TMA policies specific to their activity type. To facilitate this process, please use labels, arrows, highlighting or other methods to make explicit where in the activity there is evidence of compliance with the respective policies of the activity type.

**For initial accreditation**, TMA will review, at a minimum, the required two activities completed within the 24 month period prior to the initial accreditation interview.

**For reaccreditation**, you will receive an e-mail form the TMA CME Office approximately four weeks prior to your survey date that will include the list of selected files.

#### STEP 3: Submitting evidence of performance in practice for activity documentation review.

Each organization is expected to have available at the survey the labeled documentation using TMA's labels.

Your organization may not have evidence to demonstrate that a Criterion was met in an activity because:

- (A) There is no evidence available for the Criterion
- (B) The Criterion is not applicable to the activity.

If you do not have evidence from an activity to demonstrate that the activity meets the Criterion, place the label for the Criterion on a sheet of paper which explains why there is no evidence. For example, "No evidence because it cannot be found or it was not documented", or "No commercial support accepted for this activity". Use <u>all labels in the set</u> for each activity file.

#### **Assemble an Activity File**

For each activity, clip all the labeled documentation together and place a cover sheet on it listing the name and date of the activity, if it is directly or jointly sponsored, and whether or not it received commercial support. Only <u>one copy</u> of documentation for each activity is needed.

#### **Tips for Labeling Evidence**

- You should utilize materials developed for the activity to help your organization demonstrate compliance. A review of your organization's performance-in-practice is not intended to generate new or additional documentation. Provide only documentation that effectively demonstrates compliance. "More" is not "better."
- If multiple Criteria and/or Policies are addressed on one document (such as a course brochure or syllabus page), you may affix more than one label to the document.
- If you opt to include strings of email communications or meeting minutes as evidence of your performance-in-practice, <u>highlight</u> the items relevant to the label(s).
- Use discretion in selecting evidence that relates specifically to compliance criteria. TMA does not need to see every sign-in sheet, every completed activity evaluation form, faculty CVs, slide packets or other handouts in their entirety in order to verify compliance.
- However, <u>all</u> signed written agreements must accompany a list of commercial supporters, if commercial support was received. Also, evidence of disclosing to learners the presence or absence of relevant financial relationships for <u>all</u> persons in control of content must be provided. The best strategy is to include <u>all</u> related documentation that is necessary to demonstrate the identification and resolution of conflicts of interest for all persons (including planners) in control of content.
- Blank forms, checklists, and policy documents <u>alone</u> do not verify performancein-practice.

• Once you have affixed the label to the evidence, use highlighting, arrows, circles, or callout boxes to pinpoint in the materials your demonstration of compliance.

#### **Demonstrating Compliance with RSS in Performance in Practice**

The definition of a regularly scheduled series (RSS) as an educational activity that is presented as a series of sessions which occur on an ongoing basis (e.g., weekly, monthly, or quarterly) and is primarily planned by, and presented to, the accredited organization's own professional staff. Examples of RSS are Grand Rounds, Tumor Boards, and M&M Conferences. Each RSS is made up of multiple sessions, or individual meetings, that occur on regular intervals. A provider that produces RSS must ensure that they are designed and implemented in compliance with the accreditation requirements – just like any other activity type.

For the performance-in-practice review, compliance can be demonstrated by using all of the performance-in-practice review labels for each annual series selected,

- documentation of how the series was planned (C2 C7 SCS1)
- Documentation from the implementation of the series to demonstrate compliance with the ACCME's expectations for the Standards of Commercial Support (C7 SCS2 – C10)
- Documentation from the series to demonstrate data generated about learner change (C11)

#### **Demonstrating Compliance with Enduring Materials, Journal CME, Internet CME**

If the activity for which you are labeling evidence is an enduring material, journal, or Internet CME activity, you are required to demonstrate that the activity is in compliance with the TMA Policy that is specific to its activity type, in addition to demonstrating compliance with the Accreditation Criteria and other ACCME/TMA Policies. Please refer to the specific policies related to these activity types in the TMA Accreditation Manual.

Where possible, highlight on hard copy the evidence that these activities comply with the applicable policy. In addition, you must have available at the site survey the CME product in its entirety for each Internet, journal-based and/or enduring material CME activity selected. In the product, you may also highlight, flag, note, describe, or otherwise provide written directions to ensure that you are showing where you are meeting the policy requirements.

For Internet activities, provide a direct link to the online activities or the URL, and a username and password, when necessary. If an Internet activity selected is no longer available online, you may submit the activity saved to CD-ROM or provide access on an archived Web site. If surveyors have difficulty accessing the activities or finding the required information, you will be expected to clarify this evidence at the time of the interview. Active URLs, login IDs, and passwords must be made available for the duration of your organization's current accreditation review.

#### TMA's Interview



The TMA interview offers opportunities to the provider and to TMA. The interview allows the provider to: (1) discuss its CME program, overall CME program evaluation, and self study report and (2) clarify information described and shared in the self study report and performance in practice materials. The interview offers opportunities for TMA to ensure that any questions regarding the provider's procedures or practices are answered and that complete information about the provider's organization is considered in the accreditation decision.

TMA surveyors will not provide feedback on your compliance nor will they provide a summary of their findings or an assessment of the expected outcome of the accreditation process. Your organization's compliance, your findings, and the outcome of the accreditation process are determined by the TMA Committee on Continuing Education upon receiving a recommendation from its Subcommittee on Accreditation.

The interview is held on site at the provider's administrative office and involves a meeting between the representatives of the accredited provider and the TMA survey team. Following is a typical site survey agenda:

#### Approximately 9:00 am - 1:45 pm

- 1. Review of Activity Files Survey Team Only (9:00-10 am)
- 2. Meeting/Interview With CME Committee Chair, Staff, and Administrator(s) (10 am noon)
  - a. Overview of Survey Purpose and Role of Surveyors
  - b. Discussion of Demographic and Program Summary
  - c. Discussion of TMA Essential Areas, Elements, and Policies
- 3. Lunch with CME Committee (Noon-1:00)
- 4. Survey Team Meets Alone to Complete Recommendations & Report (1 1:30 pm)

#### Interview Fees

In addition to the accreditation fee of \$3000, providers incur expenses related to the interview. Expenses include surveyors' actual travel, meal, and incidental expenses (incurred in accordance with TMA's policies regarding reimbursable expenses for volunteers). TMA will invoice the provider for the survey team travel expenses within 30 days of the survey interview.