Guidelines and Expectations for Combined Part IV MOC and PI CME QI Projects

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The UM Office of Continuing Medical Education and Lifelong Learning (OCME&LL) oversees designation of credit for continuing medical education (CME), including Performance Improvement (PI) CME. The Part IV MOC Program within the UM Quality Department oversees designation of credit for practice assessment and improvement (Part IV) for maintenance of certification (MOC). These two units assure that the requirements of national regulatory organizations are observed: the Accreditation Council for Continuing Medical Association and the American Medical Association for CME, the American Board of Medical Specialties for MOC.

While the national requirements for PI CME and for Part IV MOC have some overlap, they each have several additional requirements to be met and documented. A particularly important difference concerns time frames. PI CME must be applied for, approved, and related information provided to participants before physicians are substantively involved in the QI project (e.g. before participants initiate before the review of the baseline data). In contrast, a formal application for Part IV MOC is submitted after a QI project is completed.

OCME&LL and the Part IV MOC Program have worked together to integrate their respective approval processes for the two areas of overlap: (a) the description of the preliminary plan for the QI project and (b) a record of each participant’s reflections about participating in the activity. The activities and timeline for QI projects to be approved for both PI CME and Part IV MOC are summarized below.

A. BEFORE PHYSICIANS ARE SUBSTANTIVELY INVOLVED IN THE PROJECT. Typically this is before the group of participating physicians begins to review baseline data, discuss underlying causes, and consider appropriate interventions. (Project leaders may have previously begun a preliminary review and consideration of baseline data.)

1. Project lead develops a plan for a project that will qualify for Part IV MOC.
   a. Develop and describe a plan for a QI project that meets Part IV requirements. Complete the “QI Project Preliminary Worksheet for Part IV Eligibility – Doc” available on the UMHS MOC website for Part IV Credit Designation (http://www.med.umich.edu/moc-qi/designating.html section 2c.) (On this page of the website, see the sections preceding 2.c for information and tools to help fill out the worksheet.) The worksheet outlines the process requirements for Part IV: at least two linked cycles of data guided improvement and the participation of physicians in key steps. These process requirements subsume those for PI CME: at least one cycle of data guided improvement and the participation of physicians in key steps.
   b. Have the plan/worksheet reviewed for confirmation that the QI project will meet Part IV MOC requirements if carried out as planned. Section 2c of the website provides information on how to submit a draft worksheet to the Part IV Program for review.

2. Project lead arranges for PI CME credit to be designated for the activity.
   a. Project lead applies for PI CME credit to be designated. Complete the “Application for PI CME Credit for a QI Project Being Documented for Part IV MOC” – available on the OCME&LL website (http://ocpd.med.umich.edu/cme/ama-pra-category-1-credit, Combined PI CME and Part IV MOC activity). The website contains instructions for completing and submitting an application for CME credit. The application must include a copy of the approved “QI Project Preliminary Worksheet” described in 1b above.
b. After PI CME credit has been approved, the project lead informs prospective participants of the opportunity to participate in the activity for CME credit. The information should provide:
   - a summary of the planned activity
   - a list of the people leading the activity
   - information regarding the presence or absence of relevant financial relationships of those leading the activity
   - the CME accreditation and credit designation statements that apply to all formal CME activities.

If many physicians will participate, some type of enrollment process may be useful (see http://www.med.umich.edu/moc-q/designating.html section 2e).

B. DURING THE PROJECT.

1. Project lead fills in descriptions of each step of the project on the report needed for Part IV MOC approval. The form for the “Report on a QI Project Eligible for Part IV MOC – Doc” is available on the Part IV Program site (http://www.med.umich.edu/moc-q/designating.html) in section 3. After the initial baseline data are available and reviewed, and initial interventions are underway, drafts of descriptions of these initial activities on the first part of the form can be submitted to Part IV Program personnel for preliminary review. The preliminary review may result in suggestions for completing descriptions of later steps more clearly and easily.

C. AFTER THE PROJECT IS COMPLETED.

1. Project lead completes reports on the activity/project. The project lead must complete two separate reports on the activity/project.

   a. For Part IV MOC, submit the completed “Report on a QI Project Eligible for Part IV MOC – DOC.” (See B1 above.) The “Report on a QI Project Eligible for Part IV MOC” regarding following requirements for MOC approval must be submitted to the UMHS Part IV MOC Program. The Part IV administrator reminds project lead to submit the PI CME report.

   b. For PI CME, submit the completed “Report on a PI CME / Part IV MOC Activity (DOC).” The “Report on a PI CME / Part IV MOC Activity” regarding following the requirements for CME credit designation must be submitted to OCM&LLL within thirty days of the end of the activity. The report is available at http://ocpd.med.umich.edu/cme-apply-cme-credit/combined-pi-cme-part-iv-moc-activity section 5.

   c. When both reports have been approved by the respective programs, Part IV administrator sends the attestations with specific language (“Commercial bias. Did the PI project avoid commercial bias? If not, explain below.”) to the project participants.

Awarding PI CME is based on both the activities of participants described in the Report on a QI Project Eligible for Part IV MOC and the additional requirements addressed in the Report on a PI CME / Part IV MOC Activity.

2. Project participants receive the “Attestation” of participation forms (either from project lead or Part IV administrator). When the reports for Part IV MOC and for PI CME have been approved, the Part IV Program prepares a modified version of the “Attestation” of participation form that includes the information required for Part IV and supplemental information required for PI CME. The Part IV administrator will provide the link to the online form to those who participated in all of the key steps of the project. (An example of a usual attestation form is at http://www.med.umich.edu/moc-q/designating.html section 4.)
3. **Part IV administrator receives completed “Attestation” forms from participants and submits them to the Part IV Program.** The Part IV administrator saves an electronic version for the files of the Part IV Program and forwards an electronic copy to OCME&LL for its files. The Part IV administrator sends the project lead an electronic copy of the participant’s “reflections on the project”.

4. **PI CME credit and Part IV MOC credit are given to participating physicians.**

   a. OCME&LL awards 30 **AMA PRA Category 1 credits™** to participating physicians.
      - For UM physicians, this is added to their transcript of participation in UM CME activities maintained by OCME&LL.
      - For non-UM physicians, OCME&LL sends them a CME certificate to retain in their personal records of CME participation.

   b. Part IV MOC administrator enters the participants’ information on the online ABMS site, which forwards the information to the relevant boards. The boards post Part IV participation on the websites for the individual diplomats.