

Policy Statement on Speaker Honoraria

The Sunrise Health System CME program handles honoraria and reimbursement of expenses according to the following policies and procedures.

- If a speaker honorarium is to be paid, the amount is set by the Education and Library (E & L) Committee at the beginning of the activity planning process and within the estimated activity budget. The E & L Committee established the rate of honoraria for local speakers between \$250 - \$1500 **per 1 hour presentation** and up to \$500 - \$2000 **per 1 hour presentation** for out of state speakers. Criteria that will be taken into account when setting an honorarium will include the individual's background, the level of honoraria for the discipline, the amount of effort entailed, and funds available in the SHS CME general ledger account. The E & L Committee has set and approved the fee associated with this professional service agreement as reasonable and comparable to similar services within our market and is at fair market value compared to nationwide and local CME honoraria.
- If a presenter also participates in the educational activity as a learner, his or her expenses shall be reimbursed, and honorarium paid for his or her presentation only.
- All honorarium and reimbursement of expenses are paid to a speaker from the Sunrise Health System CME general ledger account.
- The Office of CME completes a check request and submits the corresponding paperwork to the appropriate parties [including, but not limited to: Ethics and Compliance, Director of Medical Staff Services/CME/Library Services, President and CEO, HCA Legal Department, and Accounts Payable]. The Office of CME submits the completed packet to the accounting department. The accounting department sends a check to the speaker.
- Reimbursements for activity related expenses are processed upon submission of receipts by the speaker in the same manner as honorarium checks. Receipts are submitted to the Office of CME staff. *See attached Travel Reimbursement Policy on the following pages.*
- No funds will be requested or accepted from commercial supporters through Sunrise Health System Office of CME. Joint-providership applications that indicate requesting or accepting funding from commercial supporters shall be denied CME accreditation through Sunrise Health System.
- Funds to pay faculty honorarium and/or travel expenses is provided through the Office of CME general ledger account. No payment is provided to the Education and Library (E & L) Committee members, Activity Director, Planning Committee members, Joint Provider/Educational Partner, CME staff, or any other person involved with the planning or production of the activity.
- Facilitators/Course Directors for regularly scheduled series are not paid an honorarium nor reimbursed for travel expenses.
- Questions concerning honorarium and expense reimbursement should be directed to the Office of CME.

Process for Payments of Honoraria and Reimbursement of Expenses:

1. The Education and Library (E & L) Committee will decide the honorarium amount and amount of travel expenses to be reimbursed (if applicable) for speakers/faculty in the planning session of the committee meetings.
2. Letters of Agreement (with travel expense reimbursement verbiage if applicable) must be prepared by the Office of CME in conjunction with the Ethics and Compliance Department and submitted for administrative approval a minimum of eight weeks prior to the CME activity date.
3. The Office of CME will submit a letter of invitation; physician/speaker contract, letter of agreement (including representation and warranty form), and a W-9 form to the speakers/faculty a minimum of four weeks prior to the CME activity. Upon receipt of the contractual documents, the contractor must sign, date, and return the letter of agreement, W-9, and disclosure statement to the Office of CME a minimum of two weeks prior to the CME activity date.
4. Upon receipt of the completed contractual documents, the Office of CME will verify the contractor is eligible to contract with Sunrise Hospital by searching the EPLS (GSA), OIG, and California Government Exclusion List websites. Evidence that the contractor is not an ineligible contractor will be submitted with the contractual documents and a copy is retained in the activity file. If the contractor is determined to be an ineligible speaker, they will be disqualified from presenting a lecture and the Director of Medical Staff Services/CME/Medical Library and the E & L Committee Chair is contacted to facilitate resolution.
5. If the contractor is determined to be an eligible speaker, the Office of CME will then follow corporate and hospital policy and procedure for obtaining approval for contractual agreements.
6. At the conclusion of the activity, the Office of CME will send a travel expense voucher form and a copy of the travel expense policy to the speakers/faculty.
7. Upon receipt of the completed travel expense voucher or original travel expense receipts, the Office of CME will then follow corporate and hospital policy and procedure for obtaining approval for contractual agreements and travel expense reimbursement.