

POLICY RELATING TO FEES AND COMMERCIAL SUPPORT FOR ACCREDITATION OF CONTINUING PROFESSIONAL DEVELOPMENT PROGRAMME

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ABBREVIATIONS

CPD	Continuing Professional Development		
HPCSA	Health Professions Council of South Africa		
EMC	Executive Management Committee of the HPCSA		
The Act	Health Professions Act, 1974 (Act No. 56 of 1974) as amended.		
CEU	Continuing Education Units		

1. **DEFINITIONS**

Accreditor of a CPD programme is a Professional Board or an organisation appointed by a Professional Board to manage the CPD programme on its behalf. The role of the Accreditor includes authorisation of the CPD activities, approval of applications by Service Providers and monitoring of compliance with applicable tools of regulations.

Accredited Service Provider (ASP) is a person or an entity (such as higher education institutions, professional associations or formally constituted professional interest groups) with verifiable standing in education, training and development capable of managing CPD activities.

Assessment means the review of activities in order to identify whether these will respond to the learning needs of, and provide essential knowledge and skills to health practitioners so that they may practice safely across all areas and domains of their professions.

Attendance register is a record of participants of a CPD activity which reflects the names or registration number. Completion of the attendance register indicate participation in the CPD activity. The register must be submitted to the HPCSA by the organisation or institution responsible for organisation of the activity no later than one weeks following the activity.

Audit of practice is the systematic, critical analysis of a practice (singularly or severally owned) used for the continuous Improvement of clinical care or health outcomes based on explicit and measurable indicators of quality of care. The audit also confirms if current management or practice is consistent with current available evidence/accepted consensus guidelines on CPD.

Group learning is a training activity that is planned, implemented and evaluated in a group setting and is offered in accordance with the HPCSA's guidelines. Accredited group learning activities can occur face-to-face or online and must include at least two (2) participants.

2. PURPOSE

This policy aims to provide guidance to all health practitioners, Accreditors and Service Providers of CPD programme on matters relating to fees chargeable for CPD programme activities and commercial support. The policy also seeks to establish reference within which fees for CPD programme should be determined in a fair and ethical manner. The application of this policy will ensure consistency in charging fees and improve efficiencies in the implementation of the CPD programme.

3. SCOPE

This policy is applicable to all stakeholders of the CPD programme.

4. POLICY STATEMENT

In terms of section 61A (e) (iv) of the Health Professions Act, 1974 (Act No. 56 of 1974, as amended), the Council may make rules or adopt policies relating to any fees payable in terms of the Act, which may include activities for CPD programme. Based on this provision, this policy seeks to ensure consistency of application on matters relating to fees chargeable for CPD activities by Accreditors and Service Providers as delegated by the Council.

4. PRINCIPLES OF THE POLICY

4.1 **Mitigating commercial interference.**

- 4.1.1 When a CPD Accreditor or Service Provider stands to gain financially from recommending an application for approval, it is advised that to avoid conflict of interest, such an application be indicated to an independent CPD Accreditor for review and approval. This excludes formal training programmes and short courses activities already approved by an independent quality assurance entity within an institution or organisation.
- 4.1.2 If funds or resources from a commercial interest are contributing to the delivery of accredited CPD activity, those funds/resources must be managed appropriately and independently by the CPD Accreditor or Service Provider.

- 4.1.3 While a relationship between a service provider and commercial supporter should be transparent, it should not prejudice the CPD activity or the health practitioners.
- 4.1.4 Ethical rules, especially those relating to commission, fees and payments are applicable in all CPD processes.
- 4.1.5 A commercial entity that is not recognised by the HPCSA or its delegated Accreditors is not eligible to organise accredited CPD activities.
- 4.1.6 All individuals who are involved in the planning and development, presentation (verbal or otherwise), or evaluation of an accredited CPD activity must disclose relevant financial relationships to the Accreditor to allow for the identification and resolution of conflict of interest, where it may exist.
- 4.1.7 Health practitioners must also be informed, prior to engaging in an accredited CPD activity, of the presence (or absence) of all relevant financial relationships of all individuals/entities involved in the planning, presentation or evaluation of the accredited CPD activity, as well as the acceptance of funds/resources contributed by a commercial supporter, if applicable.
- 4.1.8 CPD Service Providers must avoid all promotion or sales communication to participants relating to the content of the activity prior, during the CPD activity. This should include, amongst other things, description of commercial support received, placement of commercial interest logos etc.
- 4.1.9 Both the commercial supporter and the CPD Service Provider must enter a written and signed agreement. Also, the financial contract should not constitute a relationship between an individual health practitioner and a commercial supporter.
- 4.1.10 The CPD Service Provider or designated partner must pay for any costs and fees, including honoraria or reimbursement of out- of-pocket expenses, to those subcontracted to undertake a CPD activity, including facilitators in accordance with the written policies and procedures.

4.2 Appropriate management of commercial promotion

- 4.2.1 Financial support may also be in the form of exhibitions or advertisements of sponsorships, and such should not influence planning or interfere with the content, nor can they be a condition for commercial support for CPD activities.
- 4.2.2 Product-promotion material or product-specific advertisement of any type is prohibited in or during the delivery of CPD activities. The juxta positioning of editorial and advertising material on the same products or subjects must be avoided.
- 4.2.3 Print, advertisements and promotional materials may not be interleafed within the pages of the CPD content.
- 4.2.4 For online based CPD activities, advertisements and promotional materials shall not be visible on the screen at the same time as the CPD content and not interleafed between screens of the CPD content.
- 4.2.5 For live, face-to-face CPD activities, advertisements and promotional materials (including so-called "commercial breaks") cannot be displayed or distributed in the educational space during a CPD activity. Service Providers cannot allow representatives of commercial interests to engage in sales or promotional activities while in the space or place of the ongoing CPD activity.
- 4.2.6 None of the journal based CPD activities should contain any advertising or product group messages of commercial interests.
- 4.2.7 Training materials that are part of a CPD activity, such as slides, abstracts and handouts, should not contain any advertising, corporate logo, trade name or a product-group message of commercial interest.
- 4.2.8 Schedules and content descriptions may include product-promotion materials or product-specific advertisements.
- 4.2.9 An Accreditor or Service Provider cannot use a commercial interest as an agent providing a CPD activity (for example, the distribution of self-study materials or arranging for electronic access to CPD activities) to health practitioners.

4.3 Fees for Accreditors and Service Providers

- 4.3.1 The annual application fee for accreditation of Service Providers should not exceed R5 546 per application.
- 4.3.2 Chargeable fees for Level 1 CPD activities (from 1 to a maximum of 8 CEU points per day): -
- 4.3.2.1 Small groups activities such as presentations, breakfast meetings, symposia, ward rounds, case study discussions, journal clubs, mentoring/supervising etc., shall charge fees not exceeding a maximum of R1 672 per application.
- 4.3.2.2 Large groups such as conferences, symposia, refresher courses (including presenters, authors and reviewers) shall not charge fees exceeding R557 per CPD point and up to a maximum of R 4 240 per application.
- 4.3.2.3 Accreditor or Service Providers should not charge fees exceeding R731 per application or to evaluate certificates obtained from international congresses.
- 4.3.2.4 In the instance of CPD recognition of publication of a book, journal article, review of article, author/co-author or published paper, poster at congress, keynote speaker at a conference may be submitted directly to the HPCSA for validation, Service provider fees may not charge fees exceeding R731 per application.
- 4.3.2.5 An application for recognition as a presenter of short course/workshop, evaluation of learning material with assessments (e.g 10-page article with 5-10 questions, each CEU point is allocated per 5 questions Points) should not be charged separately from the CPD approval.
- 4.3.2.6 Approval for postgraduate examiner and master's programme should not exceed R1 672, per application.

- 4.3.2.7 Journal clubs with assessment for group activities evaluation should not exceed R1 688, per application.
- 4.3.2.8 Learning portfolios, audit of practice and related activities should not exceed R2 000, per application.

4.3.3 Level 2 CPD activities

- 4.3.3.1 Short courses with a minimum of 25 hours with clinical hands-on training and formal assessment of the outcome (30 CEU points) should charge a maximum fee of R557 per CEU point and up to a maximum of R1 672 per application. CPD accreditation includes presenters, authors, and reviewers.
- 4.3.3.2 All evidence of attendance of postgraduate degrees, diplomas or certificates that are recognised as additional qualifications by the relevant Professional Board should be submitted to the HPCSA for a free validation at the end of each year of to obtain 30 CEUs. An additional 30 CEUs may be claimed on successful completion of the qualification (not exceeding the normal duration of the degree).
- 4.3.3.3 The rand value indicated above shall be adjusted by the end of each financial year to accommodate inflationary changes, unless Council resolves otherwise.

AMENDMENT HISTORY

Version	Date	Change request	Change comment
01	2024/03/28	New document	First release