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CPD BOOKLET

FREQUENTLY ASKED QUESTIONS ABOUT CONTINUING PROFESSIONAL DEVELOPMENT (CPD) CREDITS **(formerly known as continuing medical education (CME))**

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I. INTRODUCTION

The Board of Registration in Medicine has developed the following guide to its Continuing Professional Development (CPD) requirements for physicians. It is arranged topically, in a question-and-answer format, to respond to the most commonly asked CPD questions that the Board receives from physicians and medical education directors. It also provides a detailed, but easy-to-understand description of all major aspects of our CPD requirements. If you would like a copy of the CPD regulation itself (243 CMR 2.06(6)), you may contact the State Bookstore at (617) 727-2848.

II. BASIC BIENNIAL CPD REQUIREMENT

1. How many Continuing Professional Development (CPD) credits do I need for license renewal in Massachusetts?

During each two-year licensing cycle, you must earn a minimum of 100 credit hours, at least 40 of which must be in Category 1. The remainder may be in Category 1 or 2. (For more information about the distinction between Category 1 and 2, see Questions 2–8 below).

2. Do I receive one CPD credit for one hour of study?

Generally, yes. However, programs approved for Category 1 credit usually will specify the number of credits awarded to participants. One Category 2 CPD credit is earned for each hour of study. In addition, the Board may specify the number of credits awarded for certain activities, without regard to the exact amount of study time involved (see Questions 8 and 12 below).

3. When must I obtain my CPD credits?

All required CPD credits must be earned during the physician's biennial license renewal cycle. All licenses are renewed on the physician's birth date every two years. (Renewal dates are set forth on the physician's wallet-size registration card). It is not necessary to earn a specified number of CPD credits during each year of the two-year cycle, or during any calendar year, so long as the full CPD requirement is met during the two-year license renewal period.

4. Can excess CPD credits earned during one license renewal period be "saved" and used during a subsequent period?

No. A total of 100 CPD credits must be earned during each biennial license renewal cycle. Physicians who do not have the necessary credits during a given cycle may apply for a waiver or consider inactive status (see Question 22 below).

5. Must all physicians fulfill the Board's CPD requirements?

Yes, except for physicians in the following license categories:

- limited licensees (i.e., intern, resident or fellow pursuing postgraduate training in an accredited training program);
- physicians who have placed their licenses on inactive status (note that all inactive physicians must continue to renew their licenses every two years) (see Question 22 below);
- full licensees who are enrolled in a residency program or fellowship that has been approved by the Accreditation Council for Graduate Medical Education (and is listed in its ACGME Directory, the “Green Book”), or who are in the first or second year of a non-ACGME approved fellowship program; and
- full licensees who are serving in active military duty as members of the National Guard or of a uniformed service who are called into service during a national emergency or crisis.

III. TYPES OF REQUIRED CPD CREDITS

6. What is the difference between Category 1 and Category 2 study?

Generally, Category 1 programs are sponsored or jointly sponsored by an institution or organization accredited to offer American Medical Association Category 1 credit for CPD activities. The Accreditation Council grants accreditation for Continuing Medical Education (ACCME) to its designees, such as the Massachusetts Medical Society. If you are not certain whether a program is sponsored by an accredited organization, contact the program sponsor or the Massachusetts Medical Society’s Department of Medical Education Services at (800) 322-2303. Often the program materials themselves clearly state the number of credits that will be granted, and in what category.

In addition, there are activities for which AMA PRA Category 1 credit is awarded directly by the AMA, including publishing articles as the lead author of a peer-reviewed article in a journal included in the MEDLINE bibliographic database. To claim credit, the physician should apply to the AMA for a certificate at www.ama-assn.org/go/directcredit.

Category 2 study is defined by the American Medical Association to include any of the following:

- Attendance at lectures and seminars on medical subjects not accredited for Category 1;
- Teaching of physicians, physician trainees and other health care professionals, except the teaching of interns and residents by full-time faculty;

- Self-instruction, such as reading medical literature, use of audiovisual materials or computer-assisted instruction. This includes, for instance, study for specialty board certification;
- Medical consultation consisting of planned instruction from a consultant for not less than one hour. Both the consultant and the physician receiving the instruction may report this teaching activity (but see Question 16 below). Note that ordinary case consultation does not qualify for Category 1 or 2 credit.
- Participation in patient care review, including peer review, case conferences such as morbidity and mortality grand rounds, chart audits, and service on medical staff committees for tissue review, infections, pharmacy, etc., and hospital committees that oversee risk management, quality assurance and patient care assessment.
- Self-assessment. Physicians may earn credit for time spent taking self-assessment examinations not eligible for Category 1 credit.
- For more information on this subject, you may obtain a copy of the American Medical Association's Physician Recognition Award booklet at <http://www.ama-assn.org/ama/pub/education-careers/continuing-medical-education/physicians-recognition-award-credit-system/full-text-booklet.page> or contact the American Medical Association, Office of Physician Credentials and Qualifications, 515 North State Street, Chicago, IL 60610; telephone (312) 464-4645.

7. Are there specific areas of study that the biennial 100-hour CPD requirement must cover, and, if so, how many credits must be earned in each?

Yes. Please note the new requirements outlined below are effective February 1, 2012. In order to renew your medical license:

- 1) all physicians **must** have completed two credits of CPDs in end-of-life care issues; and
- 2) any physician that prescribes controlled substances **must** have completed three credits of CPDs in opioid and pain management.

The Board requires that:

- **A majority of the 100 credit hours must be directly related to the physician's primary area or areas of practice.** However, it is not necessary that the majority of both Category 1 and Category 2 credits be in the primary practice area(s), provided that at least 51 of the 100 credit hours are in the primary practice area(s). For instance, a physician could meet this requirement by earning 51 hours of Category 2 credit in his or her primary practice area.

- **The 100-hour requirement must include 10 credit hours of risk management study,** at least four hours of which must be in Category 1 approved activities (see Question 10 below for more details).
- **The 100-hour requirement must include two credit hours of either Category 1 or Category 2 CPD studying end-of-life care issues.** This requirement applies to all physicians, no matter the specialty. These credits may be used toward the required risk management credits of CPD. Training may be found on the Massachusetts Medical Society's website at www.massmed.org.
- **The 100-hour requirement must include two hours studying the Board's regulations.** This study is eligible for Category 1 credit only if it is undertaken as part of a program accredited for Category 1 (see Question 6 above). Study of the Patient Care Assessment (PCA) regulations (243 CMR 3.01-3.14) also qualifies as risk management study and may be counted for purposes of this requirement as well as the risk management requirement; however, the time spent simultaneously satisfying both of these requirements may be counted only once. Thus, a physician who reads the Board's Patient Care Assessment regulations for two hours fulfills the requirement to study the Board's regulations for two hours and earns two (not four) hours of Category 2 risk management credit.

The requirement to study the Board's regulations for two hours also may be met by reviewing official publications of the Board, including, for example, its Chemically Dependant Physician Policy. However, a Category 1 program that is not directly related to the Board's regulations themselves (for example, one that focuses on chemical dependency) will not meet this requirement, although it may qualify for risk management credit.

- In addition, **physicians who prescribe controlled substances, as defined in M.G.L. c. 94C, section 1, must complete three credits in opioid education and pain management.** These credits may be used toward the required risk management credits of CPD. A free on-line resource to obtain the necessary credits can be found at <http://www.opioidprescribing.com/overview>.
- Effective January 1, 2015, a **licensee shall obtain at least three credits of training in electronic health records prior to renewal.** These credits may be used toward the required risk management credits of CPD.

8. Does the Board ever approve programs or activities for Category 1 or 2 CPD Credit?

Yes. In certain cases, the Board may award the equivalent of Category 1 or 2 credits for specified activities. The following guidelines have been established to assist any organization or individual seeking Board certification of an educational activity, course or training: <http://www.mass.gov/eohhs/docs/borim/policies-guidelines/cpd-guidelines.pdf>.

Board Certification or Recertification: Becoming board certified or recertified by a specialty board accredited by the American Board of Medical Specialties or American Osteopathic Board will be deemed the equivalent of 60 credits in Category 1, including four credits in Category 1 risk management. These credits will apply to the license cycle in which the licensee receives notification from the specialty board of successful passage of the examination. To claim credit, the physician should apply to the AMA for a certificate indicating the AMA PRA Category 1 credit at www.ama-assn.org/go/directcredit.

Medically Related Degrees: Earning an advanced degree in an area related to medicine, such as a master's in public health, earns 25 Category 1 credits following award of the degree.

In addition, pursuant to Board Policy 94-005, adopted October 12, 1994, and amended on February 19, 2003, the following activities are deemed equivalent to CPD credit as delineated.

Volunteers for the Board: Each hour of work performed for the Board of Registration in Medicine as a volunteer for the Board, with a maximum of 20 hours for each two year renewal cycle, will be deemed the equivalent of one hour of Category 1 CPD credit. A licensee may apply four of these credits to fulfill his Category 1 risk management requirement. The licensee must obtain a certification of such service signed by the Executive Director as documentation of this credit.

Example: If you volunteer at the Board of Registration in Medicine for 18 hours over a two-year period, you are eligible for 18 Category 1 credits. If you wish, you may apply four of these 18 credits towards your risk management Category 1 requirement and the other 14 towards your general Category 1 requirement. You will then have to obtain the remaining 22 Category 1 credits in the usual manner in order to fulfill the requirement.

Medical Examiners: In recognition of the importance of the public service rendered by the Medical Examiner's Office and in support of the needs of a sister state agency, the Board will give credit to active medical examiners in the amount of four hours of required Category 1 risk management CPD. Upon submission of documentation of active service as a medical examiner or of attendance at appropriate professional society meetings, such as those held by the Massachusetts Medical Society, the Board will give credit to active medical examiners in the amount of four hours of required Category 1 risk management CPD. Documentation must be submitted to and approved by the Licensing Committee.

Boards of Public Health: In recognition of documentation of active service as a member of a state, local or municipal board of health ("health boards") the Board will give credit to active members of health boards in the amount of four (4) hours of required Category 1 risk management credits. Documentation must be submitted to and approved by the Licensing Committee.

9. I am giving a speech as part of a Category 1 accredited CPD program. Can I claim Category 1 credit for my speaking time?

Yes, but only if this is the first time you have presented the speech. Revised or updated speeches are not considered to be new speeches. Otherwise, the speech (as well as the preparation time) may be eligible for Category 2 credit (see Question 6 above). Note that you may earn Category 1 CPD credit for attending other presentations that are part of the Category 1 program.

10. What is "risk management study"?

Risk management study must include instruction in medical malpractice prevention, such as risk identification, patient safety and loss prevention, and may include instruction in any of the following areas:

- medical ethics
- quality assurance
- medical-legal issues
- patient relations
- end-of-life care studies
- opioid and pain management
- utilization review that directly relates to quality assurance
- non-economic aspects of practice management

Note that at least some of the instruction should focus on medical malpractice prevention, and all instruction should be in one or more of the areas described above. A course designed to improve clinical skills by increasing technical knowledge will qualify for general CPD credit, but typically will not constitute risk management study.

Participation on designated peer review committees dealing with quality assurance or on medical ethics committees can help to satisfy the Category 2 risk management requirement (see Question 6 above and Question 12 below).

11. How can I find out about Category 1 CPD courses, especially risk management courses?

Physicians should contact the Massachusetts Medical Society's Department of Medical Education Services at (800) 322-2303, or medical schools and hospital educational offices in Massachusetts.

12. What types of hospital committee work (including such activities as grand rounds) are eligible for risk management CPD credit?

Eligibility depends on whether a significant element of the committee's work is focused on either of the following: (i) reviewing or improving the quality of care in a way that does not primarily focus on the purely technical refinement of a physician's clinical skills; or

(ii) reviewing the quality of medical care through the examination of a number of cases that present similar issues, and drawing conclusions from them (particularly conclusions that suggest protocol or policy changes).

Thus, for example, service on a peer review committee or participation in morbidity and mortality grand rounds will qualify for risk management credit if the primary subject matter involves examination of a series of related cases and if the review questions whether systemic changes (e.g., in medical practice, protocol or policy) could improve the quality of care. In many cases, service on a quality assurance or Patient Care Assessment Committee (among other hospital committees) will qualify for risk management credit, provided that the physician's work meets one of the two criteria listed above. However, a committee that considers from a strictly medical point of view the specifics of the care and management of an individual patient will not be eligible for risk management CPD credit.

Similar activities that qualify for risk management CPD credit include:

- Serving as a member of a medical malpractice tribunal. This meets the definition of risk management because it involves medical-legal issues.
- Preparing to appear and testifying as an expert witness in a medical malpractice case. However you may not claim credit if you are a party to the lawsuit. This also involves medical-legal issues.
- Performing utilization review committee work, either for a hospital or an agency, to the extent that it directly involves quality assurance issues.

Note that, unless the program is accredited for Category 1, it will be eligible only for Category 2 credit. For more information on the distinction between Category 1 and 2, see Question 6 above.

IV. CALCULATING CREDITS

13. What if my license renewal cycle is shorter than two years?

If you are a newly licensed or newly active physician and your license will be renewed in one year or less, you need not earn any CPD credits during that cycle. If your renewal cycle is longer than one year but shorter than two years, you must meet one half of the basic biennial CPD requirement. Note that a special rule applies to physicians completing residency programs (see Question 14 below).

For example, if your license will be renewed in 18 months, you must earn one-half of the usual number of credits--in other words: 20 Category 1 credits, at least two in risk management; and 30 Category 2 credits, at least three in risk management. In addition, one of these hours must consist of studying the Board's regulations, and at least the majority of them must be in your primary area(s) of practice.

14. I am completing a residency or fellowship program approved by the ACGME. When must I begin accumulating CPD credits?

You should start to earn credits beginning with the first full (i.e., two-year) license renewal cycle after your program has ended.

For example, if your residency program ends on July 1, 2011, and you next renew your license on April 30, 2012, you should begin to earn credits as of April 30, 2012, and fulfill the basic biennial CPD requirement during the period that begins on April 30, 2012 and ends on April 30, 2014. You need not earn any CPD credits during the period from July 1, 2011 to April 30, 2012.

15. I am enrolled in a residency program in a foreign country and hold a full Massachusetts license. The program is not approved by the American Council of Graduate Medical Education. Do I need to obtain CPD credits?

Yes. Alternatively, you may want to request inactive status (see Question 22 below).

16. Can a physician apply CPD credits required by the Board as a part of a disciplinary order or monitoring program to the basic biennial CPD requirement?

No.

V. DOCUMENTATION

17. What documentation should I keep in order to demonstrate that I have earned my CPD credits and how long should I keep it?

For Category 1 programs, keep the certificate of attendance and/or a letter of attestation issued by the program sponsor, as well as a written record of the name of the program and program sponsor, the nature of the activity, the date(s) of attendance, and the number of credit hours earned. For Category 2 activities, keep a written record that lists the approximate number of hours spent on each type of CPD activity.

In both cases, records should be maintained for at least one full license renewal cycle after the cycle in which the credits were earned. This will permit the Board to conduct audits of compliance with the CPD requirements at any point during the two years following the cycle in which they were earned. Note that, as a condition of license renewal, you must state under oath that you have obtained the requisite number of CPD credits.

18. Should I send CPD documentation with my license renewal application?

No. Send documentation only if you are asked for audit purposes, or if the Board otherwise asks you to do so.

19. Does the Board audit CPDs and what are the consequences for noncompliance with the Board's CPDs for license renewal?

The Board conducts random auditing of CPDs. If there are any misstatements or misrepresentations made in filing your renewal application, these could result in action being taken against you by the Board.

20. If I am selected for a random CPD audit, what documentation will I have to submit for the audit?

You will receive a letter instructing you to provide documentation of 40 Category 1 AMA or AOA CPD credit hours.

21. How soon will I have to submit my CPD documentation after I receive the notification of Continuing Medical Education (CPD) notification letter?

You must provide the CPD documentation within 30 days from the date of the CPD notification letter.

VI. WAIVERS and INACTIVE STATUS/LAPSED LICENSES

22. Can I apply for a waiver if I am not able to earn all of the required CPD credits?

Yes. In applying for a waiver, the physician must explain the reasons for not fulfilling the Board's CPD requirements, state how many credits in each category have been earned, and detail a plan for completing the requirements. The grounds for granting a waiver include prolonged illness of the physician, and inaccessibility or unavailability of CPD activities. If the Board grants the waiver, the physician typically receives an extension of time in which to complete the Board's CPD requirements; generally, a waiver will not exempt the physician from those requirements (see Question 20 above).

Alternatively, a physician may request inactive status, either by filing a special form with the Board (available on request) or by checking the appropriate box on the license renewal application. Physicians on inactive status are exempt from the CPD requirements, but must continue to renew their license every two years and pay the renewal fee. Inactive physicians may not practice medicine in Massachusetts.

23. If I am required to earn CPD credits under the terms of a waiver, can I apply those credits both to the licensing cycle covered by the waiver, as well as to my current licensing cycle?

No. Credits earned under a waiver may be applied only to the period covered by the waiver.

24. I am reactivating my license after having been in inactive status (or reviving it after having allowed it to lapse). What are my CPD obligations?

Physicians who reactivate or revive their licenses must satisfy the basic biennial CPD requirement on the date their license is reactivated or revived (i.e. they must have earned 100 credits during the prior two years).

Once you have reactivated or revived your license, you must begin earning CPD credits towards the next renewal. See Question #13 above to determine the number of CPD credits you must earn during the first renewal period following reactivation or revival.

In the case of a license that is reactivated less than two years after it has been allowed to lapse or after inactive status has been elected, the physician may count CPD credits earned during the portion of his or her prior license renewal cycle that falls within two years of the reactivation date.

VII. RESOURCES FOR CPD CREDITS

Study programs acceptable for Category 1 CPD credits in risk management for physicians residing outside of the Commonwealth:

American Medical Association (AMA)

Telephone: (312) 464-4665

<http://www.ama-assn.org/ama/pub/education-careers/continuing-medical-education.page?>

Audio Digest Foundation

Telephone: (800) 423-2308

www.audiodigest.com

Boston University School of Medicine

Telephone: (617) 638-4605 or (800) 688-2475

<http://www.opioidprescribing.com/overview>

Massachusetts General Hospital Psychiatry Academy

Telephone: (866) 644-7792

www.mghcme.org/brm

Massachusetts Medical Society's Department of Medical Education Services

Telephone: (800) 322-2303

<http://www.massmed.org/Continuing-Education-and-Events/Continuing-Education-and-Events/>

Risk Management Foundation of the Harvard Medical Institutions (CRICO)

Telephone: (617) 495-5100

<https://www.rmhf.harvard.edu/CME>

CRICO publishes *Podcasts*, an audio digest, and *Insight*, a risk management journal. One hour of Category 1 credit may be earned for listening to one tape and reading one edition of the journal (1/2 hour for each). Excess credits can be applied to Category 2 CPD requirement.