

The Texas Alliance for Continuing Medical Education, Inc. (TACME) is a non-profit Texas corporation created to promote quality continuing medical education (CME) in the state of Texas. TACME membership is comprised of CME professionals representing hospitals and health systems, medical education and communications companies, medical schools, and physician professional organizations.

TACME is writing to express deep concern for a recently proposed CMS policy that TACME fears would effectively eliminate the Sunshine Act reporting exemption for accredited continuing medical education (CME).

Continuing Medical Education is a vital component of our healthcare system and allows our nation's physicians and healthcare providers to remain up to date with the latest in medical science.

Accredited CME is the gold standard of continuing medical education. By incorporating strong criteria that ensure that the education being provided to learners is based firmly in science, accredited CME guarantees that any supporter bias – be it commercial or otherwise – is eliminated from the curriculum.

In addition, the proposed rule does not recognize the ACCME's Standards for Commercial Support and the safeguards, firewalls, and transparency protections already required for accredited education.

TACME believes that CME providers will bear the unintended burden of the rule's reporting requirements. The overall impact of the administrative requirement will be significant on an industry that is typically understaffed.

The ever-evolving field of medicine requires physicians to maintain their ongoing education. The proposed rules will restrict this process, be in conflict with the Affordable Care Act's intention to provide quality healthcare, and could instead adversely affect patient outcomes in the long run.

TACME strongly recommends that the final rule retains exclusions for certified CME activities, including supporting educational materials.