

HANDBOOK OF THE
COUNCIL ON CONTINUING MEDICAL EDUCATION

DIVISION OF CONTINUING MEDICAL EDUCATION
American Osteopathic Association
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TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION.....	3
II. STATEMENT OF PURPOSE.....	3
III. RESPONSIBILITIES AND FUNCTIONS OF THE COUNCIL.....	3
IV. COUNCIL STRUCTURE	4
V. APPOINTMENTS.....	6
VI. QUALIFICATION OF THE MEMBERS	6
VII. DUTIES OF THE OFFICERS.....	6
VIII. ADMINISTRATIVE COMMITTEE	7
IX. CCME REVIEW PANEL	8
X. COUNCIL PROCEDURES.....	9
XI. AGENDA PREPARATION	9
XII. APPEAL OF ACTIONS OF THE FULL CCME	9
APPENDIX A: PROCEDURES FOR THE REVIEW PANEL OF THE AOA COUNCIL ON CONTINUING MEDICAL EDUCATION	10
APPENDIX B: AOA MEMBERSHIP REQUIREMENT DIVISION OF CONTINUING MEDICAL EDUCATION	13
APPENDIX C: AMERICAN OSTEOPATHIC ASSOCIATION GUIDELINES FOR REVIEWING AND EVALUATING OSTEOPATHIC PHYSICIANS DEFICIENT IN CME CREDIT AT THE END OF A THREE YEAR CYCLE.....	14

I. INTRODUCTION

This handbook is a procedure manual for use by the AOA Council on Continuing Medical Education (CCME) and other AOA officers. It includes a description of the Council's purpose, function, structure, operation procedures, and pertinent information.

II. STATEMENT OF PURPOSE

The Council on CME, formerly called the Committee on CME, was established in January 1973 for the purpose of directing the continuing medical education program of the AOA. The CCME coordinates the activities for continuing educational programs, recommends CME policy to the Bureau of Professional Education, establishes guidelines for the evaluation of CME programs, and approves Category 1 CME Sponsors.

III. RESPONSIBILITIES AND FUNCTIONS OF THE COUNCIL

- A. The CCME acts as a consulting and guiding Council for the AOA Division of Continuing Medical Education and for all osteopathic institutions.
- B. The CCME considers requests for reduction or waiver of CME requirements based on individual mitigating circumstances.
- C. The CCME reviews formal education programs to determine if the programs qualify for credit within AOA guidelines, and denies CME credits at its discretion.
- D. The CCME reviews applications by CME sponsors for accreditation or reaccreditation, approves or denies the applications, and notifies each applicant of the disposition of the application in a timely manner. Organizations receiving denials of accreditation may request reconsideration by the CCME at its next meeting or may appeal to the Bureau of Professional Education.
- E. The CCME reviews the results of the document surveys and evaluation processes of accredited CME sponsors. CME sponsors must maintain their accreditation through successful participation in the survey and evaluation process of the AOA accreditation program for Category 1 CME sponsors.
- F. The CCME reviews "CME Activity Report" of osteopathic physicians who fail to meet their CME requirements at the end of each 3-year cycle.
- G. Meetings of the CCME shall be held at times determined by the Council Chairman and the Secretary and not in association with other conventions or meetings.

- H. Members of the Council will be mailed a draft copy of the minutes of the Council after each meeting.
- I. The CCME makes recommendations on policy items to the Bureau of Professional Education and through that body to the Board of Trustees and, where appropriate, to the House of Delegates.
- J. All agenda items must be submitted in writing to the Department of Education Division of CME at least thirty (30) days in advance of the regularly scheduled meeting.
- K. The CCME will provide for on site consultation within the accreditation program for CME sponsors. The purpose of these visits will be consultative in purpose to assist CME sponsors to achieve improved compliance with AOA CME accreditation requirements, and to enhance the sponsors' abilities to provide quality CME programs for osteopathic physicians. The costs of such consultation shall be borne by the CME sponsor.

IV. COUNCIL STRUCTURE

- A. The CCME shall consist of nine (10) members.
 - 1. House of Delegates Nominee:
 - a. One (1) position, three (3) year term.
 - b. Experience in and commitment to excellence in continuing medical education.
 - c. AOA member, osteopathic physician.
 - d. Appointment by AOA President.
 - 2. Uniformed Services:
 - a. One (1) position, three (3) year term.
 - b. Experience in and commitment to excellence in continuing medical education.
 - c. AOA member, osteopathic physician.
 - d. Appointment by AOA President, following consultation with AMOPS.
 - 3. Small States Nominee:
 - a. One (1) position, three (3) year term.
 - b. Experience in and commitment to excellence in continuing medical education.
 - c. AOA member, osteopathic physician from a small state.
 - d. Appointment by AOA President.

4. AOSD Nominee:
 - a. One (1) position, three (3) year term.
 - b. Experience in and commitment to excellence in continuing medical education.
 - c. Appointment by AOA President

5. AACOM Nominee:
 - a. One (1) position, three (3) year term.
 - b. Member of the administration or faculty of a COM.
 - c. Experience in and commitment to excellence in continuing medical education
 - d. Appointment by AOA President.

6. AODME Nominee:
 - a. One (1) position, three (3) year term.
 - b. AOA member, osteopathic physician or Ph.D.
 - c. Must currently be in position as DME in an AOA-accredited teaching institution.
 - d. Experience in and commitment to excellence in continuing medical education.
 - e. Appointment by AOA President.

7. Practice Affiliate Representatives (2):
 - a. Two (2) positions, staggered three (3) year terms,
 - b. Practice affiliate appointments, process to be determined.
 - c. AOA members, osteopathic physicians.
 - d. Experience in and commitment to excellence in continuing medical education.
 - e. May not be from the same practice affiliate.
 - f. Appointment by AOA President.

8. Public/Industry Provider Member:
 - a. One (1) position, three (3) year term.
 - b. Representative of an industry provider of CME programming (e.g. a pharmaceutical company).
 - c. Interest in and commitment to excellence in osteopathic continuing medical education.
 - d. Appointment by AOA President.

9. Student
 - a. One (1) position, one (1) year term.
 - b. Must be enrolled in an osteopathic college.
 - c. Appointed by AOA President.

V. APPOINTMENTS

- A. The Chairman shall be appointed by the AOA President from the membership of the Council for a two (2) year term.
- B. The Vice-Chairman shall be appointed annually by the AOA President from the membership of the Council.
- C. Other members shall be appointed by the AOA President for three-year terms which shall be staggered.
- D. All appointments shall be approved by the AOA Board of Trustees.

VI. QUALIFICATION OF THE MEMBERS

- A. All osteopathic physicians on the CME Council must be members of the AOA in good standing, and shall conform to its constitution, bylaws and code of ethics.
- B. No members of the AOA Board of Trustees shall simultaneously hold a position on the CCME.

VII. DUTIES OF THE OFFICERS

- A. Chairman
 - 1. The Chairman of CCME shall preside at all meetings, appoint subcommittees, and act as ex officio member of the subcommittees. The Chairman currently serves as an advisor to the Bureau of Professional Education.
 - 2. All reports, resolutions, and recommendations of the CCME shall be presented by the Chairman to the Bureau of Professional Education and the AOA Board of Trustees.
 - 3. The Chairman shall determine the dates of the CME meetings in consultation with the Secretary of the Council and with the executive office, prior to annual and mid-year meetings of the Board of Trustees. Meetings shall be held in a cost-effective manner.
 - 4. When deemed appropriate, the Chairman shall ask the Secretary to provide pertinent material to the members and request a mail vote.

B. Vice-Chairman

1. The Vice-Chairman shall assume the duties of the chair in the absence or incapacity of the chairman.
2. The AOA President shall select the Vice-Chairman from within the membership of the CCME.
3. The Vice-Chairman shall assist the Chairman in carrying out the functions and duties of the CCME.

C. Secretary

1. The Secretary shall be a staff member of the Department of Education who is responsible for the administration of the CCME and its associated programs.
2. The Secretary shall act as the correspondent for the chairman in response to questions or interpretation of the CME program.
3. The Secretary shall coordinate the CME Council agenda:
 - a. Make meeting arrangements through AOA executive office.
 - b. Prepare meeting agendas.
 - c. Develop correspondence and official reports to reflect CCME action.
4. The Secretary shall administer the schedule of the on-site surveys in accordance with the accreditation status determined by the CCME.
5. The Secretary shall recommend the annual budget for the CCME in accordance with AOA policy. A draft budget for the next fiscal year will be reviewed by the CCME for comments and recommendations at its winter meeting.

VIII. ADMINISTRATIVE COMMITTEE

- A. The Administrative Committee is a standing subcommittee of the CCME composed of the Chairman, Vice-Chairman, and one other member of the CCME appointed annually by the chairman. The Secretary is a non-voting member who, in concert with the chairman, is responsible for the preparation of the agenda and reports to the full CCME.
- B. Its function is to review and take final action on special consideration requests for category type and number of hours of CME credit awarded to an approved program or to an individual osteopathic physician.

- C. The Administrative Committee shall also perform other necessary duties of the CCME between the regularly scheduled meetings.
- D. The Administrative Committee shall also review policy items and basic documents prior to submission to the full CCME.
- E. The Secretary shall be a non-voting member who shall supervise the preparation of the agenda and minutes of the meetings written minutes of actions and recommendations shall be submitted to the full council. The Secretary, in discussion with the recording secretary, shall notify the appropriate parties of actions taken on all items.
- F. The Administrative Committee will ordinarily conduct its meetings by telephone conference or in conjunction with a scheduled meeting of the full CCME. In all votes, the majority shall prevail. In the event that a mail ballot is required, items considered for action shall be sent to each member of the Administrative Committee who shall note his/her vote on the ballot and return it to the AOA Department of Education within 5 days of receipt. Members may also be asked to reply by phone and confirm their oral vote by completing the ballot as noted above.
- G. The Administrative Committee may refer consideration of an agenda item to the next regularly scheduled meeting of the full Council.
- H. The party who has brought a matter before the Administrative Committee may ask for the full Council to reconsider an action of the Administrative Committee at the next regularly scheduled meeting of the full Council, or may ask for review by the CCME Review Panel.

IX. CCME REVIEW PANEL

- A. The CCME Review Panel shall consist of three persons and one alternate, elected from within the membership of the Council who are not on the Administrative Committee.
- B. The CCME Review Panel shall hear appeals of actions taken by the Administrative Committee or by the Chairman of the CCME acting on behalf of the full CCME. The CCME Review Panel may meet either at sessions of the full Council or on an interim basis.
- C. No member of the CCME Review Panel may vote in an appeal where that member has previously acted on the appellant's case.
- D. Either party to an issue shall have the right to appeal to the Review Panel using the prescribed protocol found in Appendix A to this CCME Handbook (See Appendix A).

X. COUNCIL PROCEDURES

- A. The CCME shall convene as a joint meeting.
- B. The CCME shall, in all its deliberations requiring parliamentary procedure, operate according to Robert's Rule of Order newly revised.
- C. During its meeting, the CCME shall take action by vote on all motions and resolutions presented.
- D. A simple majority of the CCME shall constitute a quorum and be sufficient to consider any motion and/or resolution.

XI. AGENDA PREPARATION

- A. All agenda items received are reviewed by the Secretary and approved by the Chairman for placement on the agenda for the next scheduled meeting.
- B. Members shall be sent an advance copy of the agenda for review approximately two weeks prior to the CCME meeting. This advance agenda shall contain minutes, reports, policy items, and issues requiring advance review as determined by the chairman.

XII. APPEAL OF ACTIONS OF THE FULL CCME

If any party wishes to appeal the action taken by the full CCME, they may request review by the CME/COPT Appeal Committee of the AOA Bureau of Professional Education. A written request must be submitted, within 30 days, to Chairman, Bureau of Professional Education, American Osteopathic Association, Department of Education, 142 East Ontario Street, Chicago, Illinois 60611. Further information may be obtained by the contacting the Secretary, Bureau of Professional Education (phone 312-202-8048; 800-621-1773; fax 312-202-8200 or 8202).

APPENDIX A: PROCEDURES FOR THE REVIEW PANEL OF THE AOA COUNCIL ON CONTINUING MEDICAL EDUCATION

I. STATEMENT OF PURPOSE

All osteopathic physicians and all organizations and institutions participating in the AOA CME program have the right to appeal any decision made by the Administrative Committee or by the Chairman of the CCME acting on behalf of the full Council on Continuing Medical Education (CCME) to the CCME Review Panel. The sole purpose of this Review Panel is to be the first level of appeal of actions taken by the Administrative Committee or by the Chairman of the CCME acting on behalf of the full CCME.

II. RESPONSIBILITIES TOWARD APPEAL PROCESS

The CCME Review Panel's responsibilities in the appeal process are (a) to serve as an appellate body in hearing appeals from any individual or organization seeking relief from prior actions of the Council or Administrative Committee with proper recommendations to the full CCME; (b) to assure the CCME, Bureau of Professional Education, the AOA Board and the appellants that the CCME has acted in accordance with their rules and regulations; and (c) to provide proof to the CCME, Bureau and AOA Board that actions taken by the Review Panel conform to the rules and regulations of the CCME, the Bureau and the AOA.

III. CCME REVIEW PANEL MEETINGS

The CCME Review Panel will ordinarily meet in conjunction with the meetings of the CCME, and when there are matters to be brought before this committee. There are, however, occasions when circumstances, beyond the control of the committee, necessitate changing the meetings, or calling, at the discretion of the Chairman, additional meetings.

IV. REVIEW PANEL MEMBERSHIP

The CCME Review Panel shall consist of three persons and one alternate, elected from within the membership of the Council who are not on the Administrative Committee. No member of the Review Panel may vote in an appeal where that member has previously acted on the appellant's case.

V. WHO MAY APPEAL

Any individual AOA member, AOA affiliated organization or AOA Accredited CME Sponsor may appeal a decision of the CCME. Either party to an issue shall have the right to appeal. This policy does not apply to Constituent Committees of the AOA. Appellants bear the responsibility to state the basis of the appeal.

It is important to note that all Council actions are based upon regulations and guidelines concerning the CME program as contained in the CME GUIDE, the AOA Accreditation Requirements for AOA Category 1 CME Sponsors, and upon additional guidelines and regulations adopted by the Council subsequent to publication of the GUIDE as reported in AOA publications.

The Guide and AOA publications, therefore, should be thoroughly reviewed before a request for appeal is initiated.

VI. BASIS FOR AN APPEAL

The basis of an appeal shall be: (1) alleged bias, injustice or factual error of sufficient magnitude to warrant a change in the CCME's action; (2) departure from the guidelines or policies and procedures of the CCME; or (3) new information which was not available at the time of the action taken by the Administrative Committee or by the Chairman of the CCME on behalf of the full CCME. The requestor, not the Council, bears the burden of establishing by the preponderance of evidence that he/she is entitled to the relief sought.

VII. ADJUDICATION REACHED BY THE CCME REVIEW PANEL

The three levels of adjudication are: (1) denial -- the Review Panel upholds the action of the Council Chair or Administrative Committee; (2) approval -- the Review Panel reverses the action of the Council Chair or Administrative Committee; or (3) deferral -- the Review Panel requests that an appeal be deferred to the full CCME pending appropriate addressing of issues. After issues have been resolved and approved by the CCME, an appeal of an action of the CCME will be heard by the CCME/COPT Appeal Committee of the AOA Bureau of Professional Education.

VIII. FORMAL NOTIFICATION TO THE CCME REVIEW PANEL

After parties have been formally notified by certified mail of the CCME's action and that parties have the right to appeal to the Review Panel, all appeal requests must be submitted, within 30 days of receipt of the CCME's action to: Chairman, Council on Continuing Medical Education Review Panel, American Osteopathic Association, Department of Education, 142 East Ontario Street, Chicago, Illinois 60611.

All appeal requests must clearly state the grounds for an appeal and include applicable documentation which either reinforces viewpoints, or is additional information to certain factors or circumstances not known by the constituent committee or subcommittee at the time decisions were reached. Six copies of documentation are required, copied back-to-back, on 3-hole punched paper.

After the CCME Review Panel receives an appeal request and documentation is appropriately reviewed by staff, the appellant is notified by certified mail that the request for an appeal has been granted, and of the date, time, place, and procedures under which the appeal will be heard.

During the appeal process, it is important that the staff of the AOA Division of Continuing Medical Education be notified of any change in address so that the appeal procedure is not delayed because communications from the CCME are not received in a timely fashion.

- IX. Generally, an appellant should appear in person or by telephone before the CCME Review Panel to present his or her case. There may be circumstances which justify the granting of permission to appear through a representative or to submit the appeal, in absentia, based upon the documents alone. However, failure to appear in person or by telephone should not be allowed in the normal course, and the Review Panel shall have complete discretion with respect thereto. Request for presentation by a representative or on documents alone should be made no less than thirty days prior to the meeting.

If the appellant wishes to have legal counsel present, the CCME Review Panel must be notified of the name and address of counsel. When the appellant's legal counsel is present, the AOA legal counsel will also be present to assure that due process is served for the benefit of all parties. AOA legal counsel represents the AOA; both parties to the appeal are "members" of the AOA.

Expenses of the appellant or appellant's legal counsel are not the responsibility of the CCME Review Panel or the AOA. Regardless of the outcome, all cost incurred by the requestor if any, are the responsibility of the requestor.

X. APPEAL PROTOCOL

The protocol for an appeal is as follows: approximately 40 minutes will be allowed for the appeal; 10 minutes for the appellant or representative to make their presentation; 10 minutes for the opposing party to state its position; 10 minutes for the constituent committee to state its position (if warranted); and approximately 10 minutes for questions from the Review Panel Members.

XI. NOTIFICATION OF THE REVIEW PANEL'S ACTION

All parties to the appeal will be notified within one week by certified mail of the Committee's action. If any party wishes to appeal the action taken by the CCME Review Panel, they may request review by the full CCME. A written request must be submitted, within 30 days, to Chairman, Council on Continuing Medical Education, American Osteopathic Association, Department of Education, 142 East Ontario Street, Chicago, Illinois 60611.

APPENDIX B: AOA MEMBERSHIP REQUIREMENT DIVISION OF CONTINUING MEDICAL EDUCATION

Those members who are not granted a waiver or reduction at the end of a three year CME cycle by the Council will be required to follow the procedures as outlined below:

1. Those members who have not met Continuing Medical Education requirements, at the end of a three-year CME cycle, shall be suspended by the Membership Department on the following May 31, for a period of one year.
2. During the period of suspension, membership may be reinstated, without requiring a new membership application, at such time as the Division of Continuing Medical Education provides the Membership Department with written notification that the balance of the said CME requirements has been satisfied and upon payment of current dues.
3. Any credit hours used to meet the delinquent previous CME cycle requirements will not be applicable to the current CME cycle.
4. If membership has not been reinstated at the end of the suspension period, the doctor shall be dropped from membership and, in order to renew his or her membership, shall be required to make application in the usual manner.

Temporary CME Requirement Policy for the 1995-97 CME Cycle (Res. 23, M/98)

RESOLVED, That those members who have not met Continuing Medical Education requirements, at the end of the 1995-97 three-year CME cycle, shall be given a "grace period" of seventeen (17) months (i.e., from January 1 of the first year through May 31 of the second year of the current cycle) to satisfy their CME requirements of the previous three-year cycle; and be it further

RESOLVED, That any credit hours used during the "grace period" specified above to meet the delinquent previous CME cycle requirements will not be applicable to the current CME cycle and be it further

RESOLVED, That any osteopathic physician members who fail to satisfy their CME requirements during the "grace period" specified above shall be suspended from membership on June 1 of the year in which the "grace period" terminates for a period of six (6) months (i.e., through November 30 of that same year); and be it further

RESOLVED, That during the period of suspension specified above, membership may be reinstated, without requiring a new membership application, at such time as the Council on Continuing Medical Education provides the Department of Membership and Information Services with written notification that the balance of the said CME requirements has been satisfied, and upon payment of current dues; and be it further

RESOLVED, That any credit hours used during the suspension period specified above to meet the delinquent previous CME cycle requirements will not be applicable to the current CME cycle; and be it further

RESOLVED, That if membership has not been reinstated at the end of the suspension period specified above, the osteopathic physician shall be dropped from membership, and in order to renew his or her membership, shall be required to make application in the usual manner; and be it further

RESOLVED, That if a member is dropped from membership pursuant to this resolution, that the record in the American Osteopathic Association's office reflect that his/her membership was terminated for failure to comply with continuing medical education requirements.

APPENDIX C: AMERICAN OSTEOPATHIC ASSOCIATION GUIDELINES FOR REVIEWING AND EVALUATING OSTEOPATHIC PHYSICIANS DEFICIENT IN CME CREDIT AT THE END OF A THREE YEAR CYCLE

INTRODUCTION

In the past, the final Individual Activity Report of each D.O.'s record was available for review by the Council.

The resolution adopted by the Board of Trustees in February 1977 outlines the procedures to be followed for any member who is not granted a reduction or waiver by the Council. (See Appendix B)

GENERAL POLICIES ON NOTIFICATION AND REVIEW

Any AOA member not granted a reduction by the Council will be notified that his/her name is being reported to the Membership Committee in April of the current year. He/She may then begin to apply the current year credits to his/her record to complete the previous requirement. As indicated in the Board resolution, any credits applied to the previous record may not be applied to the current requirement.

Osteopathic physicians who are deficient in CME credits may acquire additional hours in the current year to fulfill their previous AOA CME requirement. If these credits are obtained by May 15, of the current year, their membership status will not be in jeopardy. After May 31, of the current year, they will be suspended from Membership but will have until May 31, of the next year to acquire credits to apply to their old record. Upon completion of that requirement and payment of current dues, their membership will be reinstated.

At the end of the three-year cycle the AOA staff will review the list of osteopathic physicians who are deficient in CME credit in accordance with the above guidelines and prepare a report for the Council.

WAIVER POLICY APPLICABLE TO ALL OSTEOPATHIC PHYSICIANS

Any osteopathic physician who is deficient within 15 hours of his/her total requirement and whose CME Activity Report shows an imbalance in sub-categories (but with a total of at least 150 hours of credits) may be considered for a waiver.

WAIVER POLICY APPLICABLE TO OSTEOPATHIC PHYSICIANS IN THE MILITARY

The waiver policy concerning active duty military and public health osteopathic physicians' CME requirements is that up to 30 hours of the sixty hours of AOA Category 1 CME credits per three years may be earned by participating in medical programs authorized for uniformed physicians. In order to receive the waiver of the ten hours per year of Category 1 CME credit, the Osteopathic physician must also have

met the minimum total of 150 credits for the three-year period or justify a request for waiver of hours from the Council on Continuing Medical Education.

The AOA has waivers for the CME requirement for all AOA members impacted by significant military operations.

WAIVER POLICY APPLICABLE TO OSTEOPATHIC PHYSICIANS RESIDING IN “SMALL STATES”

The waiver policy concerning osteopathic physicians residing in small states is that up to thirty (30) hours of AOA Category 1 CME credits required per three years may be waived. Small states refers to areas or states within the United States and its territories in which the population of practicing osteopathic physicians is less than 200, excluding members on active duty in the military or public health services. The listing of the small states, which qualify for application of this policy, is maintained by the AOA Department of Member Services.

Temporary CME Requirement Policy for the 1995-97 CME Cycle (Res. 23, M/98)

RESOLVED, That those members who have not met Continuing Medical Education requirements, at the end of the 1995-97 three-year CME cycle, shall be given a “grace period” of seventeen (17) months (i.e., from January 1 of the first year through May 31 of the second year of the current cycle) to satisfy their CME requirements of the previous three-year cycle; and be it further

RESOLVED, That any credit hours used during the “grace period” specified above to meet the delinquent previous CME cycle requirements will not be applicable to the current CME cycle and be it further

RESOLVED, That any osteopathic physician members who fail to satisfy their CME requirements during the “grace period” specified above shall be suspended from membership on June 1 of the year in which the “grace period” terminates for a period of six (6) months (i.e., through November 30 of that same year); and be it further

RESOLVED, That during the period of suspension specified above, membership may be reinstated, without requiring a new membership application, at such time as the Council on Continuing Medical Education provides the Department of Membership and Information Services with written notification that the balance of the said CME requirements has been satisfied, and upon payment of current dues; and be it further

RESOLVED, That any credit hours used during the suspension period specified above to meet the delinquent previous CME cycle requirements will not be applicable to the current CME cycle; and be it further

RESOLVED, That if membership has not been reinstated at the end of the suspension period specified above, the osteopathic physician shall be dropped from membership, and in order to renew his or her membership, shall be required to make application in the usual manner; and be it further

RESOLVED, That if a member is dropped from membership pursuant to this resolution, that the record in the American Osteopathic Association’s office reflect that his/her membership was terminated for failure to comply with continuing medical education requirements.