

F.d.C.

To: MSSNY Council
From: John Maese, MD
Chair, MSSNY Committee on Continuing Medical Education
Date: September 19, 2019
SUBJ: Annual Fee for MSSNY-Accredited Providers

At its Friday, June 28, 2019 meeting, the MSSNY CME Committee discussed ACCME's new tier system, based on CME-program size, that will be used to determine fees charged both to ACCME-recognized accreditors and ACCME-accredited providers. The CME Committee members agreed that based on the new tier system, it will be necessary to increase the annual fees that MSSNY charges providers. The committee also approved a guiding principle that in determining fees, MSSNY must be "kept whole."

ACCME's new tier system is described below:

As shown in the table below, there are four fee tiers, from Tier 1, comprising the smallest programs, to Tier 4, comprising the largest programs. Program size is based on the average number of activities **or** learner interactions, whichever is greater, over the past three years. The ACCME used data that providers entered into the Program and Activity Reporting System (PARS) for the 2016–2018 reporting years to assign tiers for the 2020 and 2021 annual accreditation fees.

Tiered Fee Structure for State-Accredited Providers, 2020– 2021

Tier	Approx. Centile	Average Activities Per Year	Average Learner Interactions Per Year	State-Accredited Providers: 2020 and 2021 Fee*	ACCME-Accredited Providers: 2020 and 2021 Fee*
Tier 1	Lowest half	<29	<2,685	\$750	\$5,900
Tier 2	51 - 75%	29 - 79	2,685 - 8,519	\$1,000	\$6,500
Tier 3	76 - 95%	80 - 260	8,520 - 43,687	\$1,500	\$7,500
Tier 4	Largest 5%	> 260	> 43,687	\$3,000	\$10,000

*The ACCME may change the fees after 2021.

The fees will be in place for two years; the ACCME may change the fees after that time. For newly accredited organizations, the ACCME used data from the most current year to determine provider tiers; the ACCME may change the 2021 fee for those organizations based on 2019 data reported in PARS.

MSSNY has not increased annual fees since 2014, when the fee was raised from \$1200 to \$2000 (for non-academy providers). At that time, the fee ACCME charged recognized accreditors was \$550/provider. Since then, that fee has increased four times. In 2019, the fee was \$750/provider.

The CME Committee recommends the following proposal for Council approval: MSSNY would charge all non-academy* providers \$1450, in addition to ACCME's fee. The \$1450 is based on what providers would have been charged had MSSNY increased its annual fee to keep pace with ACCME's increases in the per-provider fee to recognized accreditors. If this had been done, the 2019 annual fee would have been \$2200, which = \$1450 + 750, if the ACCME "pass-through" is broken out.

Using ACCME's chart, the fees would break out as follows:

Tiered Fee Structure for MSSNY-Accredited Providers, 2020– 2021

Tier	State-Accredited Providers: 2020 and 2021 ACCME Fee	MSSNY Fee	Total	ACCME-Accredited Providers: 2020 and 2021 Fee
Tier 1	\$750	\$1450	\$2200	\$3,900
Tier 2	\$1,000	\$1450	\$2450	\$6,500
Tier 3	\$1,500	\$1450	\$2950	\$7,500
Tier 4	\$3,000	\$1450	\$4450	\$10,000

It is worth noting that under this proposed fee structure, even the highest tier (Tier 4) would be charged less than ACCME-accredited providers in Tier 1.

*At their January 24, 2019 meeting, MSSNY Council approved new policy pinning the annual fee of MSSNY-accredited providers that are academies to the fee that ACCME charges MSSNY per provider. MSSNY currently has five providers in this category. Two of those providers are in Tier 1, one is in Tier 2, and two are in Tier 3. Policy dictates that their fees will be \$750, \$1000, and \$1500, respectively.

(FOR COUNCIL ACTION)