

وزارة الصحة العامة  
Ministry of Public Health  
دولة قطر • State of Qatar



## **Department of Healthcare Professions Accreditation Section**

### **Management of Alleged CPD Provider Non- Compliance with DHP-AS CPD Activity Accreditation Standards**

**Document Control Stamp**

**Approval:**

## Document Control

<b>Policy Category:</b> Activity Policy				
<b>Policy Name:</b> DHP-AS Management of Alleged CPD Provider Non-Compliance with DHP-AS CPD Activity Accreditation Standards				
<b>Policy Code:</b> MOPH/DHP/AS/CPDAactivities/10				
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V 1.0	DHP-AS Team	Dr. Essam Elsayed	Dr. Saad Al Kaabi (27/12/2022)	01/01/2023
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<p><b>Validity:</b> This policy is valid until updated, replaced or canceled by the Department of Healthcare Professions-Accreditation Section (DHP-AS). Update, replacement, or cancellation of this policy may occur without prior notice. However, all concerned individuals and parties shall comply with such changes once officially notified by the DHP-AS.</p>				

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## 1. Introduction

All providers of DHP-accredited CPD activities, including DHP-accredited and non-DHP-accredited CPD provider organizations, are required to develop and conduct those activities in compliance with all established administrative, educational, and ethical DHP-AS CPD activity accreditation standards.

DHP-AS routinely monitors compliance to DHP-AS CPD accreditation standards by means of regular reporting, audit, and live audit processes. Concerns about CPD providers' compliance with the DHP-AS CPD accreditation standards, however, might be reported by a third party or a whistle blower or suspected by the DHP-AS during or after the CPD activity accreditation process.

This policy is intended to be an additional safeguard for the integrity of the DHP-AS CPD activity accreditation system and shall be implemented to deal with any raised concerns related to CPD providers' non-compliance with the DHP-AS CPD activity accreditation standards, policies and procedures.

## 2. Policy Statement

- 2.1. Concern(s) about a CPD Provider organization's non-compliance with DHP-AS CPD activity accreditation standards may be identified by the DHP-AS or communicated by a third party or a whistle blower.
- 2.2. If the raised concern(s) are found to be relevant to the DHP-AS CPD activity accreditation standards, the DHP-AS shall conduct a full investigation of the alleged non-compliance.
- 2.3. If DHP-AS investigation of the raised concern(s) concludes that there is evident non-compliance, the DHP-AS shall decide (at its sole discretion) the consequences of such non-compliance on the CPD activity accreditation status, CPD provider accreditation status, and/or eligibility to provide DHP-accredited CPD activities.
- 2.4. The DHP-AS shall communicate, in writing, the result of alleged non-compliance investigation to the involved parties.

## 3. Definitions

- 3.1. **Accredited CPD Activity** is an educational activity that meets the administrative, educational, and ethical standards of the DHP-AS. Accredited CPD activities include group learning and assessment, in a live or electronic format.
- 3.2. **CPD Activity** is a learning activity designed to respond to the needs of healthcare professionals in enhancing awareness or acquisition of new knowledge, development of skills or competencies, improving performance, or health outcomes.

- 3.3. CPD Provider Organization** is an organization that assumes the responsibility and accountability for the development, delivery, and evaluation of accredited CPD activities.
- 3.4. DHP-AS Initiated Concern** is a concern identified by the DHP-AS itself and not based on a third-party or a whistle blower report (e.g., as a result of other CPD activity review, other CPD activity complaint investigation, spotted announcements or media communications, etc.).
- 3.5. Evident non-compliance** is the case in which the DHP-AS has concluded, following its investigation, that there is evidence of non-compliance with one or more of the accreditation standards for accredited CPD activities.
- 3.6. Suspected non-compliance** is the case in which the DHP-AS has decided, following its initial review, that the alleged non-compliance is relevant to one or more of the DHP-AS CPD activity accreditation standards for accredited CPD activities and should be further investigated. All DHP-AS initiated concerns are considered as suspected non-compliance.
- 3.7. Third party** is someone other than the DHP-AS or the CPD provider organization that is allegedly involved in non-compliance with DHP-AS CPD activity accreditation standards.
- 3.8. Third-Party Concern** is a concern communicated to the DHP-AS, by a third party regarding a CPD provider's compliance with DHP-AS CPD activity accreditation standards.
- 3.9. Whistle-blower** is an individual working for/with the CPD provider organization that is allegedly involved in non-compliance with DHP-AS CPD activity accreditation standards.
- 3.10. Whistle-blower Concern** is a concern communicated to the DHP-AS by a whistle-blower from the CPD provider organization regarding a CPD provider's compliance with DHP-AS CPD activity accreditation standards.

#### 4. Abbreviations

- 4.1. CPD:** Continuing Professional Development.
- 4.2. DHP:** Department of Healthcare Professions.
- 4.3. DHP-AS:** Department of Healthcare Professions Accreditation Section.
- 4.4. HCP:** HealthCare Practitioner.

#### 5. Scope

This policy applies to all accredited CPD activities within Category 1 or Category 3 of the CPD Accreditation Framework.

## 6. Roles/Responsibilities

- 6.1. The DHP-AS is responsible for developing, communicating, implementing and monitoring compliance with the DHP-AS CPD activity accreditation standards.
- 6.2. The DHP-AS identifies and manages any suspected case of non-compliance of a DHP-accredited CPD activity with the DHP-AS CPD activity accreditation standards.
- 6.3. CPD provider organizations must ensure that their DHP-accredited CPD activities are always compliant with the DHP-AS CPD activity accreditation standards.
- 6.4. The CPD provider organization subject to investigation should comply with the requirements of this policy and cooperate with DHP-AS during all stages of the alleged non-compliance investigation process.
- 6.5. Any individual witnessing or suspecting a case of non-compliance of a DHP-accredited CPD activity with the DHP-AS CPD activity accreditation standards is honor-bound to report the event to the DHP-AS.

## 7. Procedures/Guidelines

### 7.1. Raising concern(s) about CPD Provider organization's non-compliance with DHP-AS CPD activity accreditation standards:

- 7.1.1. Concern(s) about a CPD Provider organization's non-compliance with DHP-AS CPD activity accreditation standards, policies, or procedures may be raised by one or more of following parties:
  - 7.1.1.1. A whistle-blower (i.e., individuals working for/with the allegedly involved CPD provider organization).
  - 7.1.1.2. A third-party (e.g., another CPD provider organization, a healthcare practitioner, etc.).
  - 7.1.1.3. DHP-AS itself (DHP-AS initiated concern).
- 7.1.2. Confidentiality and anonymity of whistle-blowers and/or third parties communicating concerns about any CPD provider's non-compliance with DHP-AS CPD activity accreditation standards, policies, or procedures **shall be strictly maintained**. Communications between the DHP-AS and the third parties and/or whistle blowers shall be **redacted** (in a way to ensure de-identification and anonymity) before sharing any documents with the allegedly non-compliant organizations or any other party **(if they are to be shared at all)**.

### 7.2. Initial review of communicated concern(s):

- 7.2.1. The DHP-AS shall conduct an initial review (for relevance) of any concern(s), communicated by a whistle-blower and/or a third party, about a CPD Provider organization's non-compliance with DHP-AS CPD activity accreditation standards, policies, and procedures.
- 7.2.2. The DHP-AS shall determine (at its sole discretion) whether the concern(s) are relevant to DHP-AS CPD activity accreditation standards,

policies, and procedures and constitute a **suspected non-compliance** or not.

7.2.2.1. If the DHP-AS determines that the shared concern(s) **do not constitute a suspected non-compliance**, the case is closed, and the reporting whistle-blower and/or third party shall be informed of the decision.

7.2.2.2. If the DHP-AS decides that the shared concern(s) are **relevant** to the DHP-AS CPD activity accreditation standards, policies, and procedures and **constitute a suspected non-compliance**, DHP-AS shall initiate a full investigation of the allegation.

### **7.3. Investigation of suspected non-compliance with the DHP-AS CPD activity accreditation standards**

7.3.1. The DHP-AS shall communicate with the third party and/or the whistle-blower raising concern(s) about a CPD Provider organization's non-compliance with DHP-AS CPD activity accreditation standards, policies, and procedures, for clarifications and further details.

7.3.1.1. Communications with the third party and/or the whistle-blower raising concern(s) can involve written communications and/or virtual or in-person interviews.

7.3.2. The DHP-AS shall communicate any suspected non-compliance, with the DHP-AS CPD activity accreditation standards, policies, and procedures, to the allegedly involved CPD provider organization.

7.3.2.1.A **Letter of concern** stating the suspected non-compliance and the activities involved shall be communicated to the allegedly involved CPD provider organization.

7.3.2.1.1. Attached to the letter of concern, the DHP-AS may share, with the allegedly involved CPD provider organization, written communications between the DHP and the third party/whistle blower who raised the concern(s) about alleged non-compliance. The shared documents must be redacted in a way that ensures the de-identification and anonymity of the party raising the concern(s).

7.3.2.1.2. The CPD Provider organization must provide a written response to the letter of concern no later than five (5) business days of receiving the letter. The response shall include whether the CPD provider admits committing the suspected non-compliance or not and a description of the reasons and/or circumstances associated with the non-compliance, if any.

7.3.2.1.3. If the CPD provider organization fails to send a response to the letter of concern within the specified timeframe, the DHP-AS shall consider the raised concern(s) "evident non-

compliance” and that the right to appeal any consequent DHP-AS decision is waived by the CPD provider organization.

7.3.2.2. The DHP-AS may request a **meeting** with the allegedly involved CPD provider organization to further discuss the suspected non-compliance. Attending such meetings is mandatory.

7.3.2.2.1. If the CPD provider organization fails to attend the non-compliance investigation meeting(s), the DHP-AS shall consider the raised concern(s) “evident non-compliance” and that the right to appeal any consequent DHP-AS decision is waived by the CPD provider organization.

7.3.3. Following the receipt of CPD provider response letter (and meeting with the CPD provider, if requested by DHP-AS), DHP-AS **may further investigate** the suspected non-compliance by one or more of the following means:

7.3.3.1. Reviewing the accreditation application and supporting documentation of the allegedly non-compliant CPD activity.

7.3.3.2. Requesting more information and/or supporting documentation related to the allegedly non-compliant CPD activity and/or other DHP-accredited CPD activities provided by the CPD provider organization.

7.3.3.3. Auditing the allegedly non-compliant CPD activity and/or other DHP-accredited CPD activities provided by the CPD provider organization.

7.3.3.4. Live auditing an upcoming offering of the allegedly non-compliant CPD activity and/or other DHP-accredited CPD activities provided by the CPD provider organization.

7.3.3.5. Other means, e.g., meetings with staff from the allegedly involved CPD provider organization, from other CPD provider organizations, and/or other individuals as necessary for the investigation.

7.3.4. If the CPD provider organization fails to cooperate with DHP-AS during any stage of alleged non-compliance investigation (e.g., fails to timely provide the requested information and/or documentation or respond to audit or live audit processes), the DHP-AS shall consider the raised concern(s) “evident non-compliance” and that the right to appeal any consequent DHP-AS decision is waived by the CPD provider organization.

7.3.5. The DHP-AS may decide (at its sole discretion) to **suspend the CPD provider organization under investigation** from submitting any CPD activity accreditation applications or conducting DHP-accredited activities **until the investigation process is concluded** and a **decision** on the CPD provider organization’s non-compliance with the DHP-AS

CPD activity accreditation standards, policies and procedures is reached.

#### **7.4. Result of the investigation of suspected non-compliance with the DHP-AS CPD activity accreditation standards**

7.4.1. It is at the DHP-AS' sole discretion to determine the result of the investigation of alleged non-compliance with the DHP-AS CPD activity accreditation standards, policies, and procedures.

7.4.2. The result of the investigation maybe one of the following:

7.4.2.1. There is **evident non-compliance** with the DHP-AS CPD activity accreditation standards, policies, and procedures.

7.4.2.1.1. The DHP-AS shall decide (at its sole discretion) the consequences of evident non-compliance.

7.4.2.1.2. The DHP-AS shall inform the involved CPD provider organization about the result of the investigation and its consequences.

7.4.2.1.3. If the concern(s) about the investigated non-compliance were raised by a third party and/or a whistle blower, the DHP-AS shall inform the reporting party about the result (**but not the consequences**) of the investigation.

7.4.2.2. There is **no evident non-compliance** with the DHP-AS CPD activity accreditation standards, policies, and procedures.

7.4.2.2.1. The DHP-AS shall inform the involved parties (i.e., the investigated CPD provider organization and the third party and/or a whistle blower who raised the concern(s), if any) about the result of the investigation, that the case is closed, and that no further action is necessary.

#### **7.5. Consequences of evident non-compliance with the DHP-AS CPD activity accreditation standards:**

7.5.1. If the DHP-AS' investigation of a raised concern(s) about a CPD provider organization's non-compliance with the DHP-AS CPD activity accreditation standards, policies and procedures concludes that **non-compliance is evident**, the DHP-AS shall decide (at its sole discretion) the consequences on the involved DHP-accredited CPD activity and/or the CPD provider organization.

7.5.2. The consequences of an evident non-compliance of the CPD provider organization with DHP-AS CPD activity accreditation standards, policies, and/or procedures shall be **greater if** one or more of the following factors are present:



- 7.5.2.1.If the non-compliance **affects the integrity** of the DHP-AS accreditation process (e.g., involving DHP ethical standards for accredited CPD activities, involves apparent falsification of information, etc.)
- 7.5.2.2.If the non-compliance appears to be **intentional**.
- 7.5.2.3.If the non-compliance appears to be **systematic**.
- 7.5.2.4.If the non-compliance is **repeated**.
- 7.5.3. Possible **consequences** of evident non-compliance on **the CPD activities** of the involved CPD provider organization(s) may include one or more of the following:
  - 7.5.3.1.The CPD provider organization is requested to **take immediate corrective action(s)** to the CPD activity accreditation **application(s) under review**, so that the activity application shows compliance with all DHP-AS accreditation standards for accredited CPD activities.
  - 7.5.3.2.CPD activity accreditation **application(s) under review are deemed non-compliant** with the DHP-AS accreditation standards for accredited CPD activities and are rejected by the DHP-AS.
  - 7.5.3.3.The granted DHP **accreditation** of the **involved CPD activity is maintained** and the CPD provider organization is requested to take **immediate corrective action(s)** so that the activity becomes compliant with all DHP-AS accreditation standards for accredited CPD activities.
  - 7.5.3.4.The **granted DHP accreditation of the involved CPD activity is revoked**. The CPD credits granted for already conducted offerings of this activity, however, shall still be recognized by DHP.
  - 7.5.3.5.The **granted accreditation for all (or some) of DHP-accredited CPD activities** of the CPD provider organization **is revoked**. The CPD credits granted for already conducted offerings of those activities, however, shall still be recognized by DHP.
- 7.5.4. Possible **consequences** of evident non-compliance on **the involved CPD provider organization(s)** may include one or more of the following:
  - 7.5.4.1.If the involved CPD provider organization(s) is a **DHP-accredited organization**:
    - 7.5.4.1.1. The **accreditation status** of the CPD provider organization is **maintained** and the organization is requested to **prepare and submit an action plan and or/progress report(s)**

to demonstrate how the organization will address the areas of non-compliance identified in the DHP-AS investigation.

7.5.4.1.2. A recommendation is made to the DHP-AS CPD provider accreditation committee to **downgrade** the **accreditation status** of the involved CPD provider organization.

7.5.4.1.3. The **accreditation status** of the CPD provider organization is **revoked**, as per the procedures of the “DHP-AS Revocation of Accredited CPD Provider Status Policy”.

7.5.4.1.4. The CPD provider organization is **removed from the list of CPD provider organizations eligible to apply** for DHP CPD activity accreditation and/or CPD provider **accreditation**.

7.5.4.2. If the involved CPD provider organization(s) is **not a DHP-accredited organization**:

7.5.4.2.1. The CPD provider organization is requested to **prepare and submit an action plan and/or progress report(s)** to demonstrate how the organization will address the areas of non-compliance identified in the DHP-AS investigation.

7.5.4.2.2. The CPD provider organization is **suspended from submitting CPD activity accreditation applications or conducting DHP-accredited CPD activities** for a period specified by DHP-AS (at its sole discretion).

7.5.4.2.3. The CPD provider organization is **removed from the list of CPD provider organizations eligible to apply** for DHP CPD activity accreditation and/or CPD provider **accreditation**.

#### **7.6. Appealing the outcome (result and consequences) of DHP-AS investigation of suspected CPD Provider non-compliance with the DHP-AS CPD activity accreditation standards:**

7.6.1. The CPD provider organization may appeal the outcome (result and/or consequences) of the DHP-AS investigation of alleged non-compliance within thirty (30) days of receiving the non-compliance investigation decision.

7.6.2. The right for appealing the DHP-AS’s decision is considered waived by the CPD provider organization if:

7.6.2.1. The CPD provider organization failed to respond to the DHP-AS letter of concern within the specified timeframe.

7.6.2.2. The CPD provider organization failed to attend the non-compliance investigation meeting(s), if requested by DHP-AS.

7.6.2.3. The CPD provider organization failed to cooperate with DHP-AS during any stage of alleged non-compliance investigation (e.g.,

failed to timely provide the requested information and/or documentation or respond to audit or live audit processes).

7.6.2.4. The CPD provider organization did not submit an appeal request within thirty (30) days of receiving the non-compliance investigation decision.

7.6.3. Following the receipt of the CPD provider organization's appeal, the DHP-AS shall appoint a 3-member Appeal Review Panel to review and decide on the appeal request.

7.6.4. The Appeal Review Panel's decision may be one of the following:

7.6.4.1. The appeal is **rejected**, and the appealed decision shall remain the same.

7.6.4.2. The appeal is **accepted**, and the Appeal Review Panel shall re-consider the outcome (result and/or consequences) of the investigation process.

7.6.5. The decision of the Appeal Review Panel is final and cannot be re-appealed.

## **8. Flowcharts**

**8.1.** Management of Alleged CPD Provider Non-Compliance with DHP-AS CPD Activity Accreditation Standards.

## **9. References and Sources for Further Reading**

- 9.1.** ACCME Policy regarding inquiries and allegations of noncompliance that arise outside of the accreditation process.
- 9.2.** DHP-AS CPD Accreditation Appeals Policy.
- 9.3.** QBMS Examination Appeals Policy.

## **10. Related Policies**

- 10.1.** DHP-AS CPD Activity Accreditation Standards.
- 10.2.** DHP Ethical Standards for Accredited CPD Activities.
- 10.3.** DHP-AS CPD Activity Accreditation Live Audit Policy (MOPH/DHP/AS/CPDActivities/006).
- 10.4.** DHP-AS Revocation of Accredited CPD Provider Status Policy (MOPH/DHP/AS/CPDProvider/008).
- 10.5.** DHP-AS Accredited CPD Provider Audit Policy (MOPH/DHP/AS/CPDProvider/009).

## **11. Governing Law or Regulations**

- 11.1.** Amiri Decree No. 14 of the Year 2019.

## **12. Attachments/Appendices**

- 12.1.** Flowchart: Management of Alleged CPD Provider Non-Compliance with DHP-AS CPD Activity Accreditation Standards.
- 12.2.** Template: Letter of Concern about Alleged CPD Provider Non-Compliance with the DHP-AS CPD Activity Accreditation Standards.
- 12.3.** Template - Investigation of Alleged CPD Provider Non-Compliance with the DHP-AS CPD activity accreditation standards – NOTIFICATION OF FURTHER INVESTIGATION
- 12.4.** Template: Decision Letter on Investigation of Alleged CPD Provider Non-Compliance with the DHP-AS CPD activity accreditation standards – EVIDENT NON-COMPLIANCE.
- 12.5.** Template - Decision Letter on Investigation of Alleged CPD Provider Non-Compliance with the DHP-AS CPD activity accreditation standards – NO EVIDENT NON-COMPLIANCE.
- 12.6.** Template: Investigation of Alleged CPD Provider Non-Compliance with the DHP-AS CPD activity accreditation standards – APPEAL REQUEST FORM.
- 12.7.** Template: Investigation of Alleged CPD Provider Non-Compliance with the DHP-AS CPD activity accreditation standards – APPEAL RESULTS LETTER.

**Attachment 1: Management of Alleged CPD Provider Non-Compliance with DHP-AS CPD Activity Accreditation Standards Flowchart**

