



CIRCULAR NO (1) OF 2023 (DHP-AS)

From	Accreditation Section - Department of Healthcare Professions (DHP-AS) / Ministry of Public Health		
То	All CPD provider organizations in the State of Qatar		
Subject	DHP-AS Revocation of CPD Activity Accreditation Policy		
Date	20 February 2023		

In the pursuit of the Department of Healthcare Professions to safeguard the integrity of Qatar's National CME/CPD Accreditation System, the DHP-AS has developed the policy titled "DHP-AS Revocation of CPD Activity Accreditation" (attached).

The policy was developed to define instances where the accreditation of a DHP-accredited CPD activity may be revoked and the process followed for such revocation. The policy is effective from February 20, 2023.

CPD provider organizations are encouraged to review the policy and ensure the compliance of their DHP-accredited CPD activities with all DHP-AS CPD Activity Accreditation Standards, policies, and procedures.

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Thank you for your cooperation,

Department of Healthcare Professions – Accreditation Section



Department of Healthcare Professions Accreditation Section

Revocation of CPD Activity Accreditation Policy

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Approval: <u>Saa</u> 2002/2023

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Policy Category: Activity Policy

Policy Name: DHP-AS Revocation of CPD Activity Accreditation

Policy Code: MOPH/DHP/AS/CPDActivities/11

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V 1.0	DHP-AS Team	Dr. Essam Elsayed	Dr. Saad Al Kaabi (20/02/2023)	20/02/2023
		20121202		

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Validity: 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.

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1. Introduction

The DHP-AS developed a provider-based CPD accreditation system that recognizes CPD provider organizations that have met established standards in areas of educational development, governance, organizational infrastructure and administrative operations. All DHP accredited CPD provider organizations are required to develop CPD activities that meet all established educational and ethical accreditation standards. Once approved, all CPD activities developed by accredited CPD Provider organizations following DHP standards and notified to DHP-AS as per the requirements will be approved for credit within category 1 or category 3 of the CPD Accreditation Framework.

CPD providers who have not been approved as accredited CPD providers in Qatar may apply directly to the DHP-AS for review and approval of individual CPD activities credit within Category 1 or Category 3 of the CPD Accreditation Framework.

During the CPD activity accreditation validity, CPD activities may be conducted on the dates timely notified to DHP-AS, provided that all DHP-AS CPD Activity Accreditation Standards are adhered to. Failure to adhere to DHP-AS CPD Activity Accreditation Standards may result in revocation of the CPD activity accreditation.

This policy was developed to define instances where the accreditation of a DHP accredited CPD activity may be revoked, and the process followed for such revocation.

2. Policy Statement

- **2.1.** The accreditation status of a DHP accredited CPD activity **may be revoked** in the following instances:
 - 2.1.1. The CPD provider of the DHP accredited CPD activity commits a **major violation** of the DHP-AS CPD Activity Accreditation Standards, while planning, developing, conducting, managing or evaluating the accredited CPD activity, and the violation was **not notified** to DHP-AS or **could not be resolved or mitigated**, in coordination with DHP-AS.
 - 2.1.2. The CPD provider of the DHP accredited CPD activity commits a **violation** of the DHP Ethical Standards for Accredited CPD Activities, while planning, developing, conducting, managing or evaluating the accredited CPD activity, and the violation was **not notified** to DHP-AS or could **not be resolved or mitigated**, in coordination with DHP-AS.
 - 2.1.3. The CPD provider of the DHP accredited CPD activity **manipulates data** and/or **falsifies documentation** submitted to the DHP-AS during CPD activity accreditation, reporting, auditing or other accreditation related processes.
 - 2.1.4. The CPD provider of the DHP accredited CPD activity **fails to timely submit its annual report** of accredited CPD activities.

- 2.1.5. The CPD provider of the DHP accredited CPD activity is **removed from the list of CPD provider organizations eligible to apply for DHP CPD activity accreditation and/or CPD provider accreditation**.
- 2.1.6. The CPD provider of the DHP accredited CPD activity is **suspended** from submitting CPD activity accreditation applications and/or conducting DHP-accredited CPD activities because of a major infraction in other DHP accredited CPD activities.
- **2.2.** When a CPD provider of a DHP-accredited CPD activity is identified by the DHP-AS as having committed any of the above **major infractions**, the CPD activity accreditation shall be revoked, and the decision shall be communicated to the CPD provider in writing.
- **2.3.** The CPD provider organization may appeal the DHP-AS's CPD activity accreditation revocation decision, as per the procedures of the "DHP-AS CPD Activity Accreditation Appeals" Policy.

3. Definitions

- **3.1. Annual Report of Accredited CPD Activities** is an electronic report that includes specific details of all accredited CPD activities developed by the CPD provider organization over a period of one year.
- **3.2. CPD Activity** is a learning activity designed to respond to the needs of health professionals in enhancing awareness or acquisition of new knowledge, development of skills or competencies, improving performance or health outcomes.
- **3.3. CPD Provider** is an organization responsible for the development of a CPD activity that meets all established administrative, educational, and ethical standards.
- **3.4. DHP Accredited CPD Activity** is an educational activity that meets the administrative, educational and ethical standards of the DHP-AS. DHP Accredited CPD activities include group learning and assessment activities, in a live or electronic format.
- **3.5. Major change to the CPD activity budget** is a change in the budget that significantly alter its approved net profit (so that it exceeds 20% of the total budget). This may include changes to the registration fees, the amount of financial or in-kind support, or changes to any other sources of CPD activity income or expenditure.
- **3.6. Major infraction** is a major non-compliance of the CPD provider organization with the DHP accreditation standards, policies or procedures that necessitate revocation of one or more of the DHP-accredited CPD activities approved for the CPD provider organization.
- **3.7. Material change** is a substantial change in the planning, development, conductance, and/or evaluation of a CPD activity that results in, or could reasonably be foreseen to have, a significant effect on its outcome. Examples

include changes to previously selected target audience, the activity learning objectives, the activity format, the activity educational content, the activity maximum granted credits, the activity selected speakers, the activity commercial sponsorship status, or any other changes that may affect the activity learning outcomes.

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.

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 is responsible for identifying and managing any suspected case of non-compliance with the DHP-AS CPD activity accreditation standards that might constitute a major infraction that necessitates the revocation of CPD activity accreditation.
- **6.3.** The 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 organizations must obtain approval from the DHP-AS before making any material change to their DHP-accredited CPD activities.
- **6.5.** The CPD provider organizations must obtain approval from DHP-AS before making any major change to their DHP accredited CPD activity budget.
- **6.6.** The CPD provider organizations must notify the DHP-AS of any noncompliance with the DHP-AS CPD activity accreditation standards that they commit or became aware of.
- **6.7.**CPD provider organizations must provide and effectively implement, in coordination with the DHP-AS, resolution/mitigation plan(s) for any non-compliance with the DHP-AS CPD activity accreditation standards, if requested.

7. Procedures/Guidelines

7.1. Major infractions that necessitate revocation of DHP CPD activity accreditation:

- 7.1.1. The CPD provider of an accredited activity commits a **major violation** of the DHP-AS CPD Activity Accreditation Standards (or its relevant policies and procedures) while planning, developing, conducting, managing or evaluating the accredited CPD activity.
 - 7.1.1.1.Major violations of the DHP-AS CPD Activity Accreditation Standards may include:
 - 7.1.1.1.1. Making material changes in an accredited CPD activity without obtaining prior approval from the DHP-AS.
 - 7.1.1.1.2. Making major changes to the approved accredited CPD activity budget without obtaining prior approval from the DHP-AS.
 - 7.1.1.1.3. Other violations of the DHP-AS CPD activity accreditation standards, policies and/or procedures that can reasonably be judged to affect the quality of the accredited CPD activity or the integrity of the DHP CPD Activity Accreditation System.
 - 7.1.1.1.4. Other violations of the DHP-AS CPD activity accreditation standards, policies and/or procedures that are repeated or can reasonably be considered intentional.
 - 7.1.1.2.**Major violation** of the DHP-AS CPD Activity Accreditation Standards **can result in revocation** of DHP CPD activity accreditation <u>IF</u>:

7.1.1.2.1. The provider **fails to notify** DHP-AS of the **knowingly committed** violation, **OR**

7.1.1.2.2. The violation was **notified** to DHP-AS **but could not be resolved or mitigated**.

7.1.2. The CPD provider of an accredited activity commits a **violation of the DHP Ethical Standards for Accredited CPD Activities** (or its relevant policies and procedures) while planning, developing, conducting, managing or evaluating the accredited CPD activity, <u>AND</u>

7.1.2.1. The provider fails to notify DHP-AS of the knowingly committed violation, OR

7.1.2.2.The violation was **notified** to DHP-AS but **could not be resolved or mitigated.**

- 7.1.3. There is evidence that the CPD provider of the DHP accredited CPD activity **manipulated data and/or falsified documentation** submitted to the DHP-AS as part of accreditation related processes including e.g., CPD activity accreditation application, annual or interim reporting, auditing, live auditing, alleged non-compliance investigation, or any other DHP accreditation process that mandates the provision of provider related information or documentation.
- 7.1.4. The CPD provider of the DHP accredited CPD activity **fails to timely submit** its **annual report** of accredited CPD activities.
 - 7.1.4.1. This shall apply to all DHP accredited and non-DHP accredited CPD provider organizations which conducted DHP-accredited CPD activities during the reporting year.
 - 7.1.4.2.CPD activity accreditation revocation may involve all or some of the DHP accredited CPD activities (with valid DHP accreditation) approved for the CPD provider organization.
 - 7.1.4.3.The CPD credits granted for already conducted offerings of the revoked CPD activities (at the time of accreditation revocation) shall still be recognized by DHP.
- 7.1.5. The **CPD provider** of the DHP accredited CPD activity is **removed** from the list of CPD provider organizations eligible to apply for DHP CPD activity accreditation and/or CPD provider accreditation, as a result/consequence of:
 - 7.1.5.1.An **investigation of alleged non-compliance** with DHP-AS CPD activity accreditation standards (of the same or different CPD activity).
 - 7.1.5.2.Repeated non-compliance with DHP-AS activity accreditation standards in submitted CPD activity accreditation applications and subsequent "**multiple activity rejection**" (for the 3rd time).
 - 7.1.5.3.The CPD provider's own request.
- 7.1.6. The CPD provider of the DHP accredited CPD activity is **suspended** from submitting CPD activity accreditation applications and/or conducting DHP-accredited CPD activities, provided that
 - 7.1.6.1. The suspension is a consequence of DHP-AS' investigation of alleged non-compliance (that was deemed a major infraction) with DHP-AS CPD activity accreditation standards committed in another DHP accredited CPD activity.
 - 7.1.6.2. The suspension period is longer than 6 months.

7.2. Identification of major infractions that necessitate revocation of DHP CPD activity accreditation:

- 7.2.1. Suspected non-compliance with the DHP-AS CPD activity accreditation standards, that might constitute a major infraction that necessitates the revocation of CPD activity accreditation, may be identified during:
 - 7.2.1.1.DHP-AS accredited CPD provider audit process.
 - 7.2.1.2.DHP-AS CPD activity accreditation live audit process.
 - 7.2.1.3.DHP-AS action plan and report (e.g., annual, or interim report) review process.
 - 7.2.1.4.DHP-AS investigation of alleged non-compliance with DHP-AS CPD activity accreditation standards process.
- 7.2.2. The **DHP-AS shall communicate suspected non-compliance** with the DHP-AS CPD activity accreditation standards, policies, and procedures, to the involved CPD provider organization in a "CPD Activity Accreditation Status Letter of Concern" (or a "Letter of Concern about Alleged CPD Provider Non-Compliance with the DHP-AS CPD Activity Accreditation Standards", if the suspected non-compliance is identified during a DHP-AS investigation of alleged non-compliance with DHP-AS CPD activity accreditation standards).
- 7.2.3. 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, including
 - 7.2.3.1.Whether the CPD provider admits committing the suspected non-compliance or not,
 - 7.2.3.2.A justification of the committed non-compliance, if any, AND
 - 7.2.3.3.A non-compliance resolution/mitigation plan, if applicable.

7.3.CPD activity accreditation revocation:

- 7.3.1. Suspected non-compliance with the DHP-AS CPD activity accreditation standards, shall be deemed a major infraction that necessitates revocation of CPD activity accreditation if:
 - 7.3.1.1. The five (5) business days period pass without a written response being provided by the CPD provider to the DHP-AS "letter of concern",
 - *7.3.1.2.* The justification provided by the CPD provider for the committed non-compliance is deemed unacceptable,

- 7.3.1.3. The resolution/mitigation plan provided by the CPD provider for committed non-compliance is deemed insufficient or inapplicable, **OR**
- 7.3.1.4. The CPD provider fails to implement plan(s) to resolve or mitigate the identified non-compliance, if applicable.
- 7.3.2. DHP-AS may immediately revoke CPD activity accreditation (without issuing a letter of concern) when:
 - 7.3.2.1. There is evidence that a major infraction that represents a threat to the integrity of the National CME/CPD Accreditation System is being committed by a CPD provider organization.
 - 7.3.2.2. The CPD provider of a DHP accredited CPD activity is removed from the list of CPD provider organizations eligible to apply for DHP CPD activity accreditation and/or CPD provider accreditation.
 - 7.3.2.3. The CPD provider of a DHP accredited CPD activity is suspended from submitting CPD activity accreditation applications and/or conducting DHP-accredited CPD activities because of a major infraction in other DHP accredited CPD activities.
- 7.3.3. The DHP-AS shall inform, in writing, the involved CPD provider organization of the revocation of CPD activity(ies) accreditation.
- 7.3.4. The CPD provider organization may appeal the DHP-AS's CPD activity accreditation revocation decision, as per the procedures of the "DHP-AS CPD Activity Accreditation Appeals Policy".

8. Flowcharts

8.1. Identification and management of major infractions that necessitate revocation of DHP CPD activity accreditation.

9. References and Sources for Further Reading

9.1. DHP-AS Revocation of Accredited CPD Provider Status 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 Appeals Policy (MOPH/DHP/AS/CPDActivities/005).

- **10.4.** DHP-AS CPD Activity Accreditation Live Audit Policy (MOPH/DHP/AS/CPDActivities/006).
- **10.5.** DHP-AS CPD Activity-based Accreditation Submission Policy (MOPH/DHP/AS/CPDActivities/009).
- **10.6.** DHP-AS Management of Alleged CPD Provider Non-Compliance with DHP-AS CPD Activity Accreditation Standards (MOPH/DHP/AS/CPDActivities/10).
- **10.7.** 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: Identification and management of major infractions that necessitate revocation of DHP CPD activity accreditation.
- **12.2.** Template: CPD Activity Accreditation Status Letter of Concern.
- **12.3.** Template: CPD Activity(ies) Accreditation Revocation Letter.

Attachment 1: Identification and management of major infractions that necessitate revocation of DHP CPD activity accreditation Flowchart

