**Clinical Ethics Fellowship Accreditation Workgroup**

**FINAL REPORT**

At the Clinical Ethics UnConference hosted by Wellstar Health in Atlanta in April of 2022, a workgroup was formed to explore the feasibility of establishing an accreditation process for clinical ethics fellowship programs with the ultimate aim of enabling these programs to apply for Center for Medicare and Medicaid Services (CMS) funding. The workgroup invited other clinical ethicists to participate through the Clinical Ethics Consultation Affinity Group (CECAG) listserv, the in-person CECAG meeting at the ASBH Conference in 2022, and another national workgroup called the Clinical Ethics Fellowship Collaborative.

The past and current members of the workgroup are:

1. Becket Gremmels - Chair (CommonSpirit Health)
2. Amanda Altobell (Mercy Health)
3. Ellen Fox (Fox Ethics Consulting, LLC)
4. Colleen Gallagher (MD Anderson Cancer Center)
5. Trevor Bibler (Baylor College of Medicine)
6. Claire Horner (Baylor College of Medicine)
7. Cristie Cole Horsburgh (Cleveland Clinic)
8. Jason Lesandrini (WellStar Health)
9. Mark Repenshek (Ascension Health)
10. Kelly Stuart (Bon Secours Mercy Health)
11. Jason Wasserman (Oakland University William Beaumont School of Medicine).

The workgroup has been meeting regularly since the summer of 2022 and has accomplished the following:

Survey Study of Clinical Ethics Fellowship Program Directors

* Members of the workgroup contracted with Ellen Fox (Fox Ethics Consulting) to conduct a survey study of clinical ethics fellowship program directors to inform our efforts.
* The study was conducted by a research team consisting of Ellen Fox, Jason Wasserman, and two research assistants
* The study population consisted of all clinical ethics training programs in the U.S. and Canada. The investigators identified 36 programs that met the study’s inclusion criteria and achieved a 100% response rate.
* Results will be published in two papers, one on the characteristics of ethics fellowship programs and the other on the opinions of fellowship program directors on accreditation and funding.
* The following organizations supported this research by contributing in-kind or monetary support: Fox Ethics Consulting, LLC, Oakland University William Beaumont School of Medicine, WellStar Health, Ascension Health, Bon Secours, CommonSpirit, Mercy Health

CMS Funding for Clinical Ethics Fellowships

* The workgroup conducted extensive on-line research on how CMS funding might apply to clinical ethics fellowships.
* To help ensure that an adequate workforce of healthcare professionals is available to the public, CMS incentivizes hospitals to operate training programs by reimbursing them for “passed through” Medicare program costs.
* CMS funds graduate medical education as well as nursing and allied health education for a wide variety of professionals ranging from occupational therapists to X-ray technologists, dieticians, pharmacists, and hospital chaplains.
* Clinical ethics fellowship programs are not currently eligible for CMS funding. To qualify, clinical ethics fellowship programs would need to be accredited by a nationally recognized organization.
* Once a hospital has an accredited clinical ethics training program, it will be able to apply for CMS funding provided it meets specific criteria described in Federal regulations ([42 CFR § 413.85](https://www.law.cornell.edu/cfr/text/42/413.85))
* Members of the workgroup contracted with Trace Haythorn, who formerly managed accreditation for the Association for Clinical Pastoral Education, to facilitate communications between our workgroup and CMS. He has been speaking with staff at CMS and has not identified any significant barriers to funding.

Path Forward Towards Accreditation

* The workgroup has discussed two potential paths for developing an accreditation process:

1. Develop a new accrediting body, or
2. Develop a new accreditation program under an existing accrediting body.

* We determined that the first path would be a complex, costly, and lengthy undertaking, akin to the process ASBH undertook to establish the HEC-C certification program, and therefore chose to pursue the second path.
* To explore the options for using an existing accrediting body, Ellen Fox put together a comprehensive list of 89 bodies, and researched each one. She was able to identify one (and only one) one accrediting body that seems a good fit for clinical ethics: the [Commission on Accreditation of Allied Health Education Programs](https://en.wikipedia.org/wiki/Commission_on_Accreditation_of_Allied_Health_Education_Programs) (CAAHEP).
* After extension research and conversations with CAAHEP leadership, the workgroup came to the conclusion that developing an accreditation program under CAAHEP could be accomplished quickly, efficiently, and at a reasonable cost.

National Sponsors

* To begin the process of developing an accreditation process under CAAHEP, we needed to recruit one or more national nonprofit organizations related to our discipline to sponsor this effort.
* Members of the workgroup made one or more formal presentations to leadership of each of the following organizations:

1. The American Society for Bioethics and Humanities (ASBH)
2. The Association of Bioethics Program Directors (ABPD)
3. The [Association for Practical and Professional Ethics](about:blank)
4. The Catholic Health Association (CHA)
5. The Canadian Bioethics Society (CBS)
6. The Canadian Association of Professional Healthcare Ethicists (CAPHE)

* We are delighted that two organizations – ABPD and CHA – formally agreed to serve as organizational sponsors to develop an accreditation process under CAAHEP.

Establishing An Accreditation Process

* The workgroup has been working closely with our sponsoring organizations to begin the process for establishing a new accreditation process under CAAHEP as follows:
  1. ABPD and CHA have both formally agreed to serve as sponsoring organizations and requested that CAAHEP add a new health science discipline to the CAAHEP system by completingthis [Associate Membership Application](https://www.cognitoforms.com/CAAHEP2/AssociateMemberApplication).
  2. The workgroup has presented evidence that our discipline meets CAAHEP’s specific eligibility requirements by completing this [Health Science Discipline Application for Eligibility](https://www.cognitoforms.com/CAAHEP2/HealthScienceDisciplineApplicationForEligibility).
  3. CAAHEP’s Board of Directors has reviewed our applications, which will be sent to the full Commission for approval at its next meeting in April.
  4. After discussions with ABPD and CHA, we decided to retire our original workgroup and establish a new Steering Committee to continue this process.
  5. This Steering Committee will determine the membership and governance procedures for a new Committee on Accreditation (CoA) for our discipline and will complete this [Application for Committee on Accreditation Membership](https://www.cognitoforms.com/CAAHEP2/ApplicationForCommitteeOnAccreditationMembership).
  6. Once approved, the CoA will create accreditation guidelines and begin accrediting clinical ethics fellowship programs interested in accreditation.

Steering Committee

* The members of the Steering Committee are:

1. Ellen Fox – Chair (Fox Ethics Consulting, LLC)
2. Renee McLeod-Sordjan – Vice Chair (Hofstra Northwell School of Nursing & PA Studies; Northwell Health)
3. Mark Repenshek – Vice Chair (Ascension)
4. Cristie Cole Horsburgh (Cleveland Clinic)
5. Brian Kane (Catholic Health Association)
6. Ruchika Mishra (Sutter Health)
7. Margie Hodges Shaw (Univ. of Rochester School of Medicine; Strong Memorial Hospital)
8. Kathy Kinlaw – Alternate to Margie Hodges Shaw (Emory University)

More information will be forthcoming from the Steering Committee, which has its first meeting this month. In the meantime, please reach out to Ellen Fox [ellenfoxmd@gmail.com](mailto:ellenfoxmd@gmail.com) or Becket Gremmels [Becket.Gremmels@commonspirit.org](about:blank) with any questions.