

During its deliberations, COGME may draft and develop written products addressing the range of issues that impact graduate medical education (GME) and the nation's physician workforce. These products may include Reports, Letters, Resource Papers, and Issue Briefs. They provide background information supported by research, as well as the expertise and experiences of the Council members. All products are vetted in public discussion and generally include one or more recommendations for action by Congress, the Department of Health and Human Services (HHS) Secretary, or other entities involved in GME. This *Dissemination Toolkit* serves to guide COGME members in the dissemination of these materials and makes transparent the Council's rules of engagement.

## *Objective*

To publicize and disseminate COGME's work products, informing stakeholders and building support and consensus around the Council's findings and recommendations.

## *Authority*

COGME's authorizing statute, the Public Health Service Act section 762(a)(2), 42 U.S.C. § 294o(a)(2), provides that the committee is required to "Encourage entities providing graduate medical education to conduct activities to voluntarily achieve the recommendations of the Council."

## *Dissemination Activities*

### **Systematic dissemination**

#### *Federal dissemination*

- The authorizing legislation dictates that COGME include the following four federal representatives or their designees as ex officio members:
  - Assistant Secretary for Health, HHS
  - Administrator of the Centers for Medicare & Medicaid Services (CMS), HHS
  - Administrator of the Health Resources and Services Administration (HRSA), HHS
  - Chief Medical Director of the Department of Veterans Affairs (VA)
- COGME's ex officio members should ensure that their leadership is notified about COGME's published reports, as well as other publicly available products.
- The COGME Designated Federal Official (DFO) should coordinate with ex officio members to disseminate COGME's published reports through various communication platforms (e.g., e-newsletters, email blasts, etc.) utilized by the ex officio members' agencies, offices, and departments.
- The DFO should send an email to HRSA's Bureau of Health Workforce (BHW) Division of Medicine and Dentistry staff about COGME's publicly available products, encouraging them to share it within their networks, as appropriate. The DFO should also consider informing staff within other HRSA bureaus and offices who may benefit from knowing about COGME's published product, depending on its topic.

- After publication of reports and other products selected for dissemination efforts, the DFO should inform the DFOs of other BHW Federal Advisory Committees (FACs), encouraging them to share COGME’s work with their members. The DFO should consider notifying the DFOs of other HRSA FACs, depending on the topic of the product.

### *Ad hoc dissemination writing group*

- As each report or other product is developed, Council members should discuss appropriate dissemination strategies during COGME’s public meetings.
- Members should be recruited for product-specific dissemination writing groups during the public meetings; the composition of the writing group will depend on the topic and interest of the members.
- Every report should have its own dissemination writing group; the Council should discuss the need for dissemination writing groups for other products such as issue briefs and letters on a case-by-case basis.
- The ad hoc dissemination writing group may develop materials (e.g., one-pagers, graphics, etc.) to enable stakeholders to easily access and digest COGME’s published product(s) and to facilitate the group’s efforts to share COGME’s work.
- Currently, COGME does not have a budget or staff dedicated to design or produce dissemination materials. However, COGME members may work within their own organizations to assist in these efforts, at their own discretion.
- The dissemination materials must be reviewed and approved by the general COGME membership during a public meeting and made available to the public by posting on COGME’s website.
- The ad hoc dissemination writing group may consider writing letters or editorials to health and medical journals or other outlets. Members should refer to the [Guidance](#) section of this toolkit to ensure that there is a clear and articulable reason for selecting certain journals or outlets over others. The members should determine whether the letter/editorial should be written in their official committee capacity or their personal capacity.
  - If writing letters/editorials in members’ official committee capacity, such activities will be conducted by the ad hoc dissemination writing group rather than individual member efforts. If this route is pursued, the DFO will coordinate with HRSA’s Office of Communications on the proper procedure for clearance and on the appropriate language for a letter/editorial and will keep the HRSA Ethics office in the loop.
  - The ad hoc dissemination writing group may choose to write letters/editorials in members’ personal capacity for procedural reasons. If this route is pursued, the DFO will keep HRSA Ethics in the loop. Any such letters or articles should include a disclaimer. Sample disclaimer language: *“To the Editor: I am the Director of Medical System X and am writing in my personal capacity and not as a member of COGME. My statements do not necessarily represent the official views of COGME, the Health Resources and Services Administration, or the U.S. Department of Health and Human Services.”*
- The ad hoc dissemination writing group should discuss sharing COGME’s published product and/or dissemination materials with key thought leaders, organizations, and others who may be interested in COGME’s work. Members should refer to the

[Guidance](#) section of this toolkit to ensure that there is a clear and articulable reason for targeting certain individuals and entities over others.

## Individual dissemination

- As private citizens and leaders of their profession, COGME members may express their personal views, but not the views of the committee as a whole or the opinions of HHS. In doing so, COGME members may state their affiliation with the committee and factually disseminate COGME's published work. Examples of individual members' dissemination efforts include distributing copies of publicly available materials (e.g., one-pagers) at professional meetings, cross-posting COGME's publicly available product on their organizations' websites, sending it out via listservs, and utilizing social media.
- If COGME members would like to explore writing letters/editorials to journals in their personal or committee capacity about a particular COGME product, they should do so as part of the ad hoc writing group so that dissemination activities can be coordinated.

## Caveats

- The HHS Office of General Counsel (OGC) has advised against COGME members sending COGME reports and related products to local Chambers of Commerce or to their Governors' offices, as the member could not take such an action in their official capacity and would need to be explicitly clear that COGME had no role in initiating this contact. While not expressly prohibited, there is a concern that such contact might be viewed as an official action and a form of lobbying.<sup>1</sup>
- It may be possible to work with the ex officio representing the Assistant Secretary for Health to flag a report to the National Governors Association, if the topic is on the HHS Secretary's agenda; however, the DFO would need to explore internally whether HRSA would support this action.
- Members should reference the *Ethical Guidance for Advisory Committee Members: Disseminating Advisory Committee Deliverable* document and should feel free to contact the DFO or the HRSA Ethics Office with any questions.

## Evaluation

- The ad hoc work group will communicate its dissemination plan to the general COGME membership as updates during public meetings and/or through the DFO as email updates between public meetings.
- Members should provide updates on their individual dissemination efforts during public meetings and/or through the DFO to inform the ad hoc dissemination work group.
- Each ad hoc writing group will assess the dissemination activities around its product to better understand which strategies worked and to inform future efforts. The group will update the general COGME members during public meetings and/or through the DFO as email updates between public meetings.

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<sup>1</sup> COGME members are special government employees who are considered government employees when conducting official business. In addition to the standard grassroots lobbying ban on Congress, HHS has an appropriations rider prohibiting grassroots lobbying of state and local officials. OGC guidance to COGME about this was received in January 2023.

## Guidance

The ad hoc dissemination writing group should use the following framework to determine whether the **journals or other outlets** it targets to publicize its products have been chosen in an objective manner.



The ad hoc dissemination work group should use the following framework to determine whether the **individuals and/or organizations** it targets to amplify COGME’s recommendations have been considered in an objective manner.



The DFO will consult the HRSA Ethics Office and OGC for guidance on a specific activity, as needed.