

Name of Policy: <u>CNE Guidelines for commercial support</u>		 Revision date: February 1, 2017 Original effective date: February 1, 2012	
Policy Number: 3364-82-02			
Approving Officer: Provost and Executive Vice President for Academic Affairs			
Responsible Agent: Dean, College of Nursing			
Scope: UT Faculty, Staff, Students and Joint Sponsors			
	New policy proposal	<input checked="" type="checkbox"/>	Minor/technical revision of existing policy
	Major revision of existing policy		Reaffirmation of existing policy

(A) Policy statement

Specific procedures must be followed when planning and administering ANCC/ONA continuing nursing education (CNE) activities that receive commercial support funding. American Nurses Credentialing Center (ANCC) defines “commercial support” is when a commercial entity provides money or in-kind services to a provider for an activity. *the Provider Unit must adhere to the ANCC Content Integrity Standards for Industry Support in Continuing Nursing Education Activities at all times.

(B) Purpose of policy

To maintain compliance, educational activities receiving external commercial support must adhere to the ANCC Criteria and Ohio Nurses Association (ONA) rules as defined in 2015 Provider Unit Manual.

(C) Procedure

(1) There must be complete independence from proprietary entities in the planning, designing, delivering and evaluating CNE activities. The University of Toledo (provider) must make all decisions regarding the disposition and disbursement of commercial support. The University of Toledo (provider) cannot be required by an entity with a commercial interest to accept advice or services concerning teachers, authors, or other education matters, including content, from the entity as conditions of contributing funds or services.

(2) All commercial support associated with a continuing nursing education activity must be given with the full knowledge and approval of the CNE Director.

(3) The terms, conditions, and purposes of the commercial support must be documented in a written agreement with the entity that includes the University of Toledo (provider) and its educational partner(s). The agreement must include the provider, even if the support is given directly to the provider's educational partner or a co-provider.

- (a) The written agreement must specify the entity that is the source of commercial support.
- (b) Both the entity and the University of Toledo Director must sign the written agreement regarding the support to be provided or accepted.

(4) The provider, the co-provider, or designated educational partner must directly pay any teacher or author honoraria or reimbursement of out-of-pocket expenses in compliance with the provider's written policies and procedures.

- (a) No other payment shall be given to the director of the activity, planning committee members, teachers, or authors, co-provider, or any others involved with the supported activity.
- (b) If faculty or authors are listed on the agenda as facilitating or conducting a presentation or session, but participate in the remainder of an educational event as a learner, their expenses can be reimbursed and honoraria can be paid for their teacher or author role only.
- (c) The provider may not use commercial support to pay for travel, lodging, honoraria, or personal expenses for non-teacher or non-author participants of a continuing nursing education activity. The provider may use commercial support to pay for travel, lodging, honoraria, or personal expenses for bona fide employees and volunteers of the provider, co-provider or educational partner.

(5) Social events or meals at continuing nursing education activities cannot compete with, or take precedence over, the educational events.

(6) Arrangements for commercial exhibits or advertisements cannot influence planning or interfere with the presentation, nor can they be a condition of the provision of commercial support for continuing education activities.

- (a) Product-promotion material or product-specific advertisement of any type is prohibited in or during continuing nursing education activities. The editorial and advertisements material on the same products on subjects must be avoided. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from continuing nursing education.
 - (i) Print, advertisements and promotional materials shall not be interleaved within the pages of the continuing nursing education content. Advertisements and promotional materials may face the first or last pages of printed CNE content as long as these materials are not related to the continuing nursing education content they face and are not paid for by the entities with commercial interests in the continuing nursing education activity.
 - (ii) Computer-based, advertisements and promotional materials shall not be visible on the screen at the same time as the continuing nursing education

content and shall not be interleaved between computer “windows” or screens of the continuing nursing education content.

- (iii) Audio and video recording, advertisements and promotional materials shall not be included within the continuing nursing education. There will be no “commercial breaks.”
 - (iv) Live face-to-face continuing nursing education, advertisements and promotional materials shall not be displayed or distributed in the educational space immediately before, during, or after a continuing nursing education activity. Providers shall not allow representatives of an entity with commercial interests to engage in sales or promotional activities while in the space or place of the continuing nursing education activity.
- (b) Educational materials that are part of a continuing nursing education activity, such as slides, abstracts, and handouts, shall not contain any advertising, trade name, or a product-group message.
- (c) Print or electronic information distributed about the non-continuing nursing education elements of a continuing nursing education activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product promotion material or product-specific advertisement.
- (d) A provider shall not use an entity with a commercial interest as the agent providing a continuing nursing education activity to learners, e.g., distribution of self-study continuing nursing education activities or arranging for electronic access to continuing nursing education activities.
- (7) The content or format of a continuing nursing education activity or its related materials must promote improvements or quality in health care and not a specific proprietary business interest of an entity with a commercial interest.
- (1) Presentations must give a balanced view of therapeutic options. Use of generic names will contribute to this impartiality. If the continuing nursing education educational material or content includes trade names, when available, trade names from several companies should be used, not just trade names from a single company.
- (8) Relevant financial relationships of those with control over continuing nursing education content. Disclosure of information about provider and faculty relationships must be disclosed in writing to participants in a continuing nursing education activity.
- (1) The University of Toledo (provider) is responsible for ensuring that learners are aware of any relevant financial relationship(s), to include the name of the individual; the name of the commercial interest(s), and the nature of the relationship the person has with each commercial interest.
 - (2) For an individual with no relevant financial relationship(s), the learners must be informed that no relevant financial relationship(s) exist.

- (3) The provider’s acknowledgment of commercial support may state the name, mission, and areas of clinical involvement of the company or institution and may include corporate logos and slogans, if they are not product-promotional in nature.
 - (a) The source of all support from entities with commercial interests must be disclosed to learners. When commercial support is other than monetary support, the nature of the support must be disclosed to learners.
 - (b) “Disclosure” must never include the use of a trade name or a product-group message.

- (4) A provider must disclose the above information to learners prior to or at the time of the beginning of the educational activity.

*For full details of the regulated Standards for Commercial Support go the ACCME website at <http://www.accme.org/requirements/accreditation-requirements-cme-providers/standards-for-commercial-support>

<p>Approved by:</p> <p><u>/s/</u></p> <p>Andrew T. Hsu, Ph.D.</p> <p>Provost and Executive Vice President for Academic Affairs</p> <p><u>February 7, 2017</u></p> <p>Date</p> <p><i>Review/Revision Completed by:</i></p> <p>Senior Leadership Team Director, Continuing Nursing Education Dean, College of Nursing CNE Advisory Committee</p>	<p>Policies Superseded by This Policy:</p> <ul style="list-style-type: none">• <i>Previous 3364-82-02, effective date February 1, 2012</i>• <p>Initial effective date: February 1, 2012</p> <p>Review/Revision Date: February 1, 2017</p> <p>Next review date: February 1, 2020</p>
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