Name of Policy: **CNE Conflict of interest and disclosure**

Policy Number: 3364-82-04

Approving Officer: Provost and Executive Vice President for Academic Affairs

Responsible Agent: Dean, College of Nursing

Scope: UT Faculty, Staff, Students and Joint Sponsors

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Revision date: February 1, 2017

Original effective date: February 1, 2012

(A) Policy statement

Specific planning processes and organizational criteria must be followed to identify and resolve all conflicts of interest for a continuing nursing education (CNE) activity. The American Nurses Credentialing Center (ANCC) position on conflict of interest states, a conflict of interest exists if an entity that is in a position to benefit financially from the success of a CNE activity is also in a position to influence the content, design, or implementation of the CNE activity.

(B) Purpose of policy

To maintain compliance with the ANCC Standards and to keep activities free of influence or control of a commercial entity. As defined in 2015 Provider Unit Manual, University of Toledo (UT) CNE requires that the content of CNE activities and related materials provide balance, independence, and objectivity. ANCC requires that all individuals involved in the CNE activity must disclose any relevant financial relationships within the past twelve months prior to the educational activity.

(C) Procedure

1. A continuing nursing education provider unit must ensure that the following decisions were made free from the control of a commercial interest:
   (a) Identification of continuing nursing education needs,
   (b) Determination of educational objectives,
   (c) Selection and presentation of content,
   (d) Selection of all persons and organizations that will be in a position to control the content of the continuing nursing education,
   (e) Selection of educational methods, and
   (f) Evaluation of the activity
2 An entity has commercial interest if:
   (a) An entity that produces, markets, re-sells or distributes health care goods or
       services consumed by, or used on, patients; or
   (b) An entity that is owned or controlled, in whole or in part, by an entity that
       produces, markets, resells, or distributes health care goods or services consumed
       by, or used on, patients.

3 An entity is not a commercial interest if it is a government entity; a non-profit
   organization; or a non-health care related entity. ANCC does not consider
   providers of clinical service directly to patients to be commercial interests.

4 The provider must be able to show that each individual who is in a position to
   control the content of an education activity has disclosed all financial
   relationships with any entity with a commercial interest in the provider.

5 CE content with products or services from which, if purchased, the individual or
   organization might receive personal financial benefit, the individual or
   organization must disclose to the CE activity provider his/her/its relationship to
   the product or service developer, manufacturer, distributor or seller.

6 An individual who refuses to disclose financial relationships will be disqualified
   from being a planning committee member, a teacher, or an author of continuing
   nursing education and cannot have control, or responsibility for, the development,
   management, presentation, or evaluation of the CNE activity.

7 All planners and presenters/content specialists are required to complete conflict of
   interest disclosures, as noted on the Conflict of Interest Form. The nurse planner
   and the Director of the CNE is accountable for reviewing these disclosures,
   validating that no conflict of interest exists, or determining how resolution of the
   conflict will be achieved, if appropriate.

8 All individuals that have control of the content must complete a “Terms and
   Conditions Agreement for Speakers/Authors” disclosure form and electronically
   submit the form to the Nurse Planner or the Director of the CNE.
     (a) Disclosure must include the name of the individual; name of the commercial
         interest; the nature of the relationship the person has with each commercial
         interest. Disclosure includes relationships of a spouse or partner.

9 Disclosure of the nature of the conflict of interest or no conflict of interest
   statements must be made in writing and provided to the learners prior to the
   beginning of the educational activity.
**Approved by:**

/s/
Andrew T. Hsu, Ph.D.
Provost and Executive Vice President for Academic Affairs

February 7, 2017

Date

**Review/Revision Completed by:**
Senior Leadership Team
Director, Continuing Nursing Education
Dean, College of Nursing
CNE Advisory Committee

**Policies Superseded by This Policy:**

- *Previous 3364-82-04, effective date February 1, 2012*

Initial effective date: February 1, 2012
Review/Revision Date: February 1, 2017
Next review date: February 1, 2020