

3364-82-04 CNE conflict of interest and disclosure.**(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.

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.

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CERTIFIED ELECTRONICALLY

Certification

04/23/2019

Date

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