



## **A Guide to Ensuring Content Integrity: Content of the Educational Activity**

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All materials used for the educational activity must be free from commercial bias. To guard against the presence of commercial bias, the Nurse Planner is responsible for ensuring the following:

1. Slides, handouts and other materials presented to the learner related to the educational activity do not display any logos or other trademarks of a Commercial Interest Organization
2. Live (in-person) educational activities are presented without reference to a Commercial Interest Organization; acknowledgement of commercial support is limited to the name of the entity providing support
3. Enduring materials do not include logos, trademarks or other insignia of, or references to, a Commercial Interest Organization; acknowledgement of commercial support is limited to the name of the entity providing support
4. Web-based materials do not include logos, other trademarks or other insignia of, or reference to, a Commercial Interest Organization; acknowledgement of commercial support is limited to the name of the entity providing support
5. Evaluations of the educational activity make no reference to a commercial Interest Organization or its products or services; and
6. Learners are not recruited for any purpose during the activity or evaluation.

### **Ensuring Independence when Planning, Implementing and Evaluating Continuing Nursing Education Activities**

ANCC Accreditation criteria require that quality continuing nursing education activities are planned, implemented with integrity, free from the undue influence of commercial interest organizations.

The following questions may be used to evaluate whether an actual or potential conflict of interest exists. A review of the ANCC Content Integrity Standards for Industry Support in Continuing Nursing Educational Activities is recommended (available at the following link: [www.nursecredentialing.org/Accreditation-CEContentIntegrity](http://www.nursecredentialing.org/Accreditation-CEContentIntegrity)).

### **The Planning Process**

When the planning process for an educational activity is initiated, the first individual who must be evaluated for any potential or actual conflict of interest is the Nurse Planner for the activity. The Nurse Planner may not evaluate her/his own potential for conflicts of interest. An independent party such as the Lead/Primary Nurse Planner or another member of the planning

committee must evaluate the Nurse Planner for potential conflicts of interest and document findings appropriately.

Any Nurse Planner with a potential or actual conflict of interest should recuse her/himself from the activity. The potential conflict of interest must be resolved by another Nurse Planner for the educational activity, the Lead/Primary Nurse Planner of the organization, or other independent party.

During the planning process for an educational activity and throughout implementation and evaluation of the activity, it is the responsibility of the Nurse Planner to ensure 1) all actual and/or potential conflicts of interest are identified and resolved; 2) content integrity for the activity is maintained; and 3) learners are aware of all actual and/or potential conflicts of interest prior to participating in the activity.

Therefore, the Nurse Planner must first identify all individuals with the potential ability to control or influence the content of the educational activity. Individuals may include, but are not limited to, members of the planning committee, faculty, presenters, authors, and/or content reviewers.

Questions to evaluate for potential or actual conflicts of interest:

- Which individual(s) has (have) the ability to control or influence the content of the educational activity being planned?
  - All planning committee members have the ability to influence or control content of an educational activity through activities such as gathering needs assessment data; identifying the appropriate gap in knowledge, skills or practices; choosing content; and/or recommending faculty/presenters/authors.
  - Faculty/presenters/authors have the ability to determine what to include or not include in a presentation.
  - Content reviewers can influence content by determining appropriateness of content, if best available or most current evidence was chosen, and the presence or absence of bias.
- Have all individuals with the ability to control or influence the content of the educational activity completed a Biographical/Conflict of Interest disclosure form?
- Is the Biographical/Conflict of Interest disclosure form up to date with current accreditation criteria?
  - Requires disclosure of the individual and her/his spouse or partner
  - Requires disclosure of all relationships with commercial interest organizations
  - Requires disclosure of all relationships within the past 12 months
  - Signed by the individual (electronic signature acceptable)
  - Reviewed and signed by the Nurse Planner
  - Dated (must be within 12 months of the educational activity and reviewed in relation to the educational activity being planned at the time)
- Could the content of the educational activity be related to a product or service of a commercial interest organization? Examples could include but are not limited to:
  - Pharmaceutical products used for patients

- Pharmacologic management of diseases
- Devices used on patients
- Products used on patients
- Did any individual with the ability to influence the content of the educational activity disclose a relationship with a commercial interest organization, including relationships of a spouse or partner?
- Is the relationship that was disclosed relative to the content of the educational activity being planned?
- For relevant relationships, how will the Nurse Planner/planning committee resolve the conflict of interest?
- For relevant relationships, how will the Nurse Planner/planning committee disclose the conflict of interest to learners? (Note: only relevant relationships are required to be disclosed).

### **The Planning Committee's Responsibility for Ensuring Independence When Planning Educational Activities**

- As per Accreditation criteria, every educational activity must be planned by at least two people, a Nurse Planner who is responsible for ensuring compliance with Accreditation criteria at the activity level and a content expert. Additional individuals may be asked to participate on a Planning Committee as needed for an individual activity. All individuals, however, who are defined as members of the Planning Committee may not have relationships with commercial interest organizations, the products and services of which are related to the content of the educational activity being planned. Because members of the Planning Committee are able to directly influence the educational activity through activities such as determining objectives, choosing content for the activity and selecting speakers/authors/presenters, independence cannot be ensured if individuals who have relevant relationships with commercial interest organizations, the products and services of which are related to the content of the educational activity being planned, are on the Planning Committee.
- The Planning Committee may, however, choose an individual who has a relationship with a commercial interest organization for a role such as a speaker or presenter as long as the Nurse Planner has evaluated the relationship for relevance and implemented a resolution process as outlined in the 2015 ANCC Primary Accreditation Application Manual.

### **Completing the Conflict of Interest Form and Evaluating Relationships**

ANCC defines conflict of interest as an affiliation or relationship of a financial nature with a Commercial Interest Organization that might bias a person's ability to objectively participate in the planning, implementation, or review of a learning activity. During the planning process for an educational activity, evaluation of the presence or absence of conflicts of interest must occur for all individuals in a position to control or influence the content of the activity. The planning process starts with evaluation of conflict of interest for the Nurse Planner, and an independent party (someone other than the Nurse Planner) must confirm the Nurse Planner has no conflicts of interest that would impact planning the educational activity.

Once confirmed, the Nurse Planner is responsible for evaluating the presence or absence of conflicts of interest for all other members of the planning committee, presenters, speakers,

authors, and content reviewers. Relationships with Commercial Interest Organizations are classified as relevant if the products or services of the commercial interest are related to the content of the educational activity.

All individuals completing a conflict of interest form understand the ANCC definition of conflict of interest. It is common for individuals completing a conflict of interest form to disclose all relationships with organizations that might appear to result in benefit of a financial nature. For example, an individual may disclose his/her employer as a relationship that might pose a conflict of interest. If the employer is not classified as a Commercial Interest Organization, however, the relationship is not defined as one that presents a conflict of interest.

When an individual discloses a relationship with an organization on a conflict of interest form, the Nurse Planner must review the information to determine whether the organization meets the definition of a Commercial Interest Organization.

- Failure to recognize an organization as a Commercial Interest Organization may result in an individual having the opportunity to unduly bias the educational activity.
- Failure to recognize an organization as not meeting the definition of a Commercial Interest Organization because an individual may be precluded from participating in the planning process of an educational activity without cause, learners may be told the relationship presents a conflict of interest for the individual when it does not, and it is difficult to determine if the Nurse Planner truly understands the definition of conflict of interest.

In the event that the relationship disclosed is not with a Commercial Interest Organization, the Nurse Planner could simply make a notation in the record such as "organization not commercial interest – not relevant" thus reflecting review and accurate assessment of the situation.

In summary, remember these key points:

1. The Nurse Planner may not evaluate his/her relationships with Commercial Interest Organizations and determine whether or not a conflict of interest exists. Another person must make this determination and sign the bio/COI form to indicate that the review has been completed and an appropriate decision made regarding the Nurse Planner's ability to proceed with the planning process.
2. The person providing the disclosure does not determine the presence or absence of conflict of interest. He/she simply discloses relationships with Commercial Interest Organizations. It is the responsibility of the Nurse Planner to determine whether or not the relationship represents a conflict of interest for this particular activity. The signature on the bio/COI form validates that the Nurse Planner has completed this process.