

Standards for Integrity and Independence in Accredited Continuing Education Crosswalk

ANCC has adopted the ACCME Standards for Integrity and Independence in Accredited Continuing Education. While the education you provide is not itself accredited, these standards apply to your activity planning and your ability to award contact hours because NCNA is an ANCC Accredited Approver.

Previous	Current
<p>Commercial Interest Entity-Company that makes, produces, markets, or resells products or services consumed by or used on patients or a company that is controlled by an entity that does these things.</p>	<p>Ineligible Company-Any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Examples include Pharmacy benefit managers, device manufactures or distributors, compounding pharmacies that manufacture proprietary compounds, and diagnostic labs that sell proprietary compounds. More examples are available at: https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce/eligibility</p>
<p>Activity Content and Conflict of Interest, COI Is the content of this activity related to any products consumed by or used on patients? If no, then there is not any way there can be a COI and disclose there is not any conflict of interest. If yes, then you would need to complete a COI process and resolve and disclose to learners. COI data is collected for everyone with the ability to control content and their spouse for the last 12 months</p>	<p>Activity Content and Relevant Financial Relationship Determination/Disclosure Is the content non-clinical such as communication? If yes, no further action. There aren't any relevant financial relationships to identify, mitigate nor disclose if the activity ONLY addresses a non-clinical topic (e.g., leadership, communication skills training,)</p> <p>All clinical content related to clinical care or knowledge must have a process to identify, mitigate, and disclose relevant financial relationships. Each person with the ability to control content is assessed for relevant financial relationships with ineligible companies within the last 24 months.</p>
<p>Employees of Commercial Interest Entities-Exclude employees of commercial interest entities from participating as planners or speakers if the content is related to the products or services of company</p>	<p>Exclude owners/employees of ineligible companies from participating as planners or speakers unless one of the three exceptions apply:</p> <ul style="list-style-type: none"> • When the content of the activity is not related to the business lines or products of their employer/company • When the content of the activity is limited to basic science research, such as pre-clinical research and drug discovery, or the methodologies of research, and they do not make care recommendations • When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used

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<p><u>Resolution needed for those with a relationship to a commercial interest relevant to the topic</u></p> <ul style="list-style-type: none"> Removed individual with the relevant financial relationship from participating in activity/Revised the role of the individual so that the relationship is no longer relevant Review of the activity by the nurse planner /planning committee/content reviewer 	<p><u>Mitigation required for those with a relevant finance relationship to an ineligible company</u></p> <p>Document the person, role in the activity, strategy(ies) taken to mitigate the relevant financial relationship and the date implemented.</p> <p>Possible mitigation strategies</p> <ul style="list-style-type: none"> Recusal from controlling aspects of planning and content with which there is a financial relationship (Remove/revise the role of the individual so that the relationship is no longer relevant)-Planners Peer review of planning decisions by persons without relevant financial relationships-Planners Peer review of content by persons without relevant financial relationships (nurse planner, planning committee member, content reviewer, etc.)- Faculty/Speakers Attest that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines) Faculty/Speakers Divest the financial relationship-Both Use other methods –describe-Both
<p><u>Nurse Planner Signature</u></p> <p>The nurse planner signature is included on COI form except on their own form</p>	<p><u>Signature not required</u> on <i>Financial Disclosure</i> form and <i>Mitigation Worksheet</i>.</p> <ul style="list-style-type: none"> Nurse planner is still accountable for ensuring adherence to criteria Nurse planner cannot mitigate their own relevant financial relationships. Another person with knowledge of the process is required to validate the nurse planner’s data but a signature is not required
<p><u>COI Documentation</u></p> <p>COI data OR statement by nurse planner that there is no conflict of interest because the activity is not related to any products or services of a commercial entity</p>	<p><u>Document evidence of process for identifying relevant financial relationships for clinical topics only</u></p> <p>Document in the activity file whether the activity is clinical or non-clinical. If non-clinical, no further action. If clinical, provide evidence of process to identify relevant financial relationship(s). If no relevant financial relationship(s), disclose no relevant financial relationships. If relevant financial relationship(s), document mitigation using the Mitigation Worksheet</p> <p><u>Clinical Topic Activity Documentation Template Attachment 1</u></p> <p>If a financial relationship is noted through your identification process and/or on the <i>Financial Disclosure</i> form, complete the <i>Mitigation Worksheet</i></p>

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<p><u>COI Disclosure</u> Presence or absence of conflicts of interest for all individuals in a position to control content</p>	<p><u>Disclosure of Relevant Financial Relationships</u> Presence or absence of relevant financial relationships for all individuals in a position to control content for clinical activities only. See examples on <i>Key Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships</i></p> <p>Note- It is inaccurate to document absence of financial relationships for non-clinical topics</p>
<p><u>ABSENCE of conflict example:</u> No one with the ability to control content of this activity has a conflict of interest.</p>	<p><u>Attachment 4-Clinical Activity Evidence of required disclosure information provided to learners</u> None of the planners or presenters for this educational activity have relevant financial relationships to disclose with ineligible companies.</p>
<p><u>Attachment 4 -PRESENCE of conflicts example:</u> There are no conflicts of interest except for John Doe, who is on the speaker’s bureau for XYZ Device Company</p>	<p><u>Attachment 4-Activity Information-Relevant Financial Relationship Disclosure for activities NOT meeting exception(s)</u> <u>Presence of relevant financial relationships for clinical content</u> None of the planners or presenters for this educational activity have relevant financial relationships to disclose with ineligible companies except for speaker Nicolas Garcia who is on the speakers’ bureau for XYZ Device Company. All of the relevant financial relationships listed for this individual have been mitigated. See <i>Key Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships</i></p>
<p><u>Assurance of Content Integrity</u> The Nurse Planner must assure that content integrity is maintained and that non-CE activities are separated from those that award contact hours.</p>	<p><u>Standard 5 includes previous standards and the following</u> Learners must be able to easily distinguish between NCPD and other activities</p> <ul style="list-style-type: none"> • NCPD activities must NOT occur in the same educational space within 30 minutes before or after a non-NCPD activity • Ineligible companies may not provide access to, or distribute, accredited education to learners