

# Guideline for Commercial Support for Continuing Nursing Education

**Summary:** The attached guidelines on "Commercial Support of Continuing Nursing Education" have been developed by the American Nurses Association (ANA) to assist/guide nursing continuing educators who wish to utilize the resources of corporations to provide continuing education programs. These guidelines enable the provider to maintain a balance between the need for industry-supported dissemination of scientific information and promotional activities which meet the requirements of law, as well as professional standards of the American Nurses Association.

## Background

The American Nurses Association (ANA) strongly supports continuing education for nurses and other health care providers as a means of ensuring high quality care for patients and clients. In recent years, businesses that provide continuing education (CE) have experienced tremendous growth accompanied by increased cost to conduct a program. As a result, with increasing frequency, CE programs and research projects involving the nursing profession are funded or sponsored by pharmaceutical companies, the airline industry and health care product companies. Combining education and promotion of products or procedures can potentially entail the loss of objectivity in the educational mission, and can detract from the important benefits of continuing nursing education (CNE) to nurses. Consequently, it is critical that ANA provide guidelines for the profession to facilitate responsible oversight of commercial support for CNE.

In 1992, the Food and Drug Administration (FDA) issued a policy statement on industry supported scientific and educational activities for health care professionals. An important element of the policy is a written agreement between the supporting company and

the provider of an educational program, stating that the activity is to be educational and non-promotional, and that the company is to play no role in the design or conduct of the program that might bias the treatment of the topic. FDA regulations clearly affect drug and product company exhibitors at nursing and other health discipline conferences. ANA agrees that the goal should be the free exchange of information in a non-biased scientific independent manner, and that a policy of full disclosure and independent provider activity must be pursued.

CE providers have benefited by corporate support of educational programs for many years. However, in today's environment, with the public highly focused on health care and its cost, one of the areas being closely scrutinized is pharmaceutical expenditures for advertising and promotion, much of which occurs at medical, dental, and other health care educational or scientific conferences. It is clear that with an increasing number of states granting prescriptive privileges for nurses there will be increased interest by pharmaceutical and other commercial companies in gaining access to these nurses. A major means of gaining access is through supporting CNE. Additionally, many advanced practice nurses are currently employed in institutional settings and have the opportunity to influence purchasing power within those institutions. It is timely for ANA to explore these issues and in particular examine professional policy, and ethical codes which guide the practice of nursing continuing educators.

## References

- \* Association of American Medical Colleges. Guidelines for Faculty Involvement in Commercially Supported Continuing Medical Education. Washington, D.C., 1992, p. 4.
  - \* Accreditation Council for Continuing Medical Education. Standards for Commercial Support of Continuing Medical Education, Lake Bluff, Illinois. 1992.
  - \* Food and Drug Administration. Industry Supported Scientific/Educational Activities Policy Statement. 57 Federal Register 56, 412 (1992).
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Effective Date: April 8, 1994  
Status: New Position Statement  
Originated by: Council on Continuing Education and Staff Development  
Adopted by: ANA Board of Directors

Related Past Action:

1. Code for Nurses with Interpretive Statements, 1985
  2. [Attachment I](#): American Nurses Association Guidelines for Commercial Support of Continuing Nursing Education
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## **PREAMBLE**

The purpose of continuing nursing education (CNE) is to build upon the educational and experiential bases of the professional nurse for the enhancement of practice, education, administration, research or theory development to the end of improving the health of the public. It is the responsibility of the provider of a CNE activity to assure that the activity is designed primarily for that purpose.

Commercial companies often provide financial support of these continuing education activities. These activities include: (a) education sessions within the conference program, and/or (b) education sessions developed by the exhibitor. The relationship between the provider and the commercial supporter necessitates a separation of the independent education activities and promotion of commercial products or procedures. Combining education and promotion can entail the potential loss of a critical element of objectivity in the educational mission and can detract from the important benefits of CNE to nurses and the health care consumer. Guidance from ANA is offered to prevent conflict of interest. These guidelines are designed to facilitate responsible oversight of commercial support for the provision of continuing nursing education in both audiences.

## Guiding Principles

There are several guiding principles which will help to avoid conflict of interest and the introduction of bias in CNE activities. These are:

- \* CNE is conducted for the education of the audience and for the benefit of the health care consumer. It builds upon the knowledge and competence levels of nurses. It should not be primarily for the benefit of the commercial supporters, providers, or presenters involved in the activity.
- \* CNE programs should be objective and, where legitimate differences or contrasting views exist, balanced. The assurance of objectivity and balance is the responsibility of the provider.
- \* Factors that can result in the introduction of bias must be avoided. These may include monetary inducements beyond necessary expenses, gifts of more than nominal value, or personal amenities.
- \* Presenters, topics, course materials and "enduring materials" must be subject to the approval of and be the responsibility of the provider and not be at the discretion of commercial sponsor(s).
- \* Disclosure of affiliations, sponsorships, financial support and other potentially biasing factors must routinely be made to the audience by the provider and participating presenters.
- \* The educational activity records document evidence of compliance with the Guidelines for Commercial Support of Continuing Education.

Adapted from: Association of American Medical Colleges.(1992). Guidelines for Faculty Involvement in Commercially Supported Continuing Medical Education. Washington D.C.: Association of American Medical Colleges.(p4).

## **INDEPENDENCE OF APPROVED CONTINUING NURSING EDUCATION PROVIDERS**

\* The design and production of continuing nursing educational activities shall be the responsibility of the providers. This responsibility includes approval of topics, presenters, educational materials, and the administration of the activities.

\* The educational activities shall be free of endorsement and bias for or against any product and shall not be used for promotional purposes.

## **EXHIBITS**

When commercial exhibits are part of a CNE activity, arrangements for the exhibits shall not influence planning or interfere with the presentation of the CNE activity. If at all possible, exhibits and promotional materials should not be displayed or distributed in the same room as the educational activity. If this is not possible, there should be some method of separating the exhibits from the part of the room used for educational presentation.

Providers may allow representatives of commercial supporters to attend educational activities as long as the representatives do not engage in sales or promotional activities while the educational presentation is taking place.

Contact hours shall not be awarded for time spent visiting exhibits. Legitimate learning experiences with commercial products, as part of the educational design, documented with objectives, content outlines and evaluation, may be awarded contact hours. Such activities may include experience on computer systems and with software to learn the use of information systems for clinical decision making.

## **DISCLOSURE**

The provider of continuing nursing education shall have a policy requiring disclosure to the audience of any and all potentially biasing factors in the educational activities. Such factors include financial or professional interests of the presenter with the commercial products used in the educational presentation. Disclosure shall occur in brief statements on program materials such as brochures, syllabi, and publications. Disclosure to participants shall be documented and entered into the provider file.

## **FINANCIAL**

Management of funds from commercial supporters:

- \* Independence of the provider(s) in the use of contributed funds
- \* The provider should be responsible for and accountable for the administration of the financial aspects of CNE activities. Generally, commercial support should be given to the provider unit in the form of designated or unrestricted educational grants. The terms and conditions of the support should be documented.
- \* All support associated with a CNE activity must be given with the full knowledge and approval of the provider. No other funds from a commercial supporter should be paid to the administrator of the provider unit, presenter(s), or others involved in the educational activity.
- \* Payments to Presenter(s)
- \* Payment of reasonable honoraria and reimbursement of out of pocket expenses for presenters is customary and proper. Providing honoraria, accommodations, or travel arrangements for faculty beyond those normally needed to accomplish the educational function is not appropriate.
- \* Acknowledgement of Commercial Support
- \* Commercial support must be acknowledged in print to the audience. Reference to specific products should not be made.

- \* Accountability for Commercial Support
- \* Following the CNE activity, upon request, the provider should be prepared to report to each commercial supporter, information concerning the expenditure of funds each has provided.
- \* Each commercial supporter shall report information concerning their expenditures in support of the activity to the provider.
- \* Social Events
- \* Commercially supported social events at CNE activities should not compete with, nor take precedence over the educational events.
- \* Financial Support for Participation in Educational Activities
- \* In connection with an educational activity, the provider may not use funds originating from a commercial source to pay travel, lodging, registration fees, or personal expenses for non-participants.
- \* Scholarship or other special funding to permit participants to attend CNE activities may be provided.
- \* The provider shall have a written protocol for awarding of scholarships, if applicable.

## **DOCUMENTATION**

To document compliance with disclosure, financial and independence guidelines, the following should be maintained for each educational activity receiving commercial support:

- \* a letter of agreement with the commercial supporter(s) specifying:
  1. 1) the terms of acceptance of the educational grant;
  2. 2) the specific financial or other assistance provided;
  3. 3) the clear statement of provider responsibility for planning, content, and execution of the educational activity
  4. 4) any assistance with materials/information provided by the commercial supporter at the provider's request.
- \* a letter of agreement with presenters including policies and forms for declaring conflict of interest.
- \* written evidence of follow-up on any problem or complaint related to the commercial support of the CNE activity.

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