

# **Oncology Nursing Society (ONS)\***

## **Commercial Support Policies for**

## **Continuing Education Activities**

**\*The term “ONS” or “Oncology Nursing Society” within this policy refers to ONS, ONS Chapters, the ONS Foundation, Oncology Nursing Certification Corporation and the ONS For-Profit Subsidiary.**

## **I. Independence**

- A. To maintain the independence of the Oncology Nursing Society (ONS) as a continuing education (CE) provider, the following decisions regarding CE activities must be made free of control of any commercial interest:
  - 1. Identification of CE needs
  - 2. Determination of educational objectives
  - 3. Selection and presentation of content
  - 4. Selection of all people and organizations that will be in positions to control the content of the CE activity
  - 5. Selection of education methods
  - 6. Evaluation of the activity
- B. Independence of ONS as a CE Provider must be stipulated in the Commercial Support Letter of Agreement.
- C. All parties to the Commercial Support Letter of Agreement must agree to comply with ONS's Commercial Support Policies.
- D. ONS must make all decisions regarding the disposition and disbursement of commercial support.
- E. ONS shall not be required by a commercial interest to accept advice or services concerning speakers, authors, or participants or other education matters, including activity content and format, from a commercial interest as conditions of contributing funds or services. ONS may seek suggestions from the commercial interest regarding faculty members, content, and other aspects of the CE activity. However, the commercial interest cannot make the acceptance of advice or services concerning speakers, authors, participants, or other education matters, including content, a condition of support.
- F. A commercial interest cannot take the role of a non-accredited partner in a joint sponsorship of a CE program.

## II. Disclosures Relevant to Potential Commercial Bias

- A. All planning committee members, speakers, presenters, editors, and authors must complete a Full Disclosure Form indicating any relevant financial relationship(s).
- B. A relevant financial relationship is defined as a financial relationship in any amount occurring in the past 12 months (as of date the form is completed) that creates a conflict of interest.
- C. Completed Full Disclosure Forms must be received in ample time to be reviewed and discussed by the appropriate monitoring group (e.g., staff, planning team, editor). Planners, speakers, and authors shall receive clear and unambiguous instructions stating that failure to return the form by the stated deadline may result in disqualification from participation in the CE activity. Individuals failing or refusing to complete the disclosure form in ample time to be reviewed by the monitoring group or omitting pertinent disclosure information may be disqualified as a planning committee member, speaker, or author. If omissions are discovered after the fact, the individual may be disqualified from future participation as a planning committee member, speaker, or author.
- D. The following information regarding relevant financial relationship(s) of all individuals in a position to control CE content will be disclosed to learners in writing in activity materials.
  - 1. Name of the individual
  - 2. Name of the commercial interest(s) with which the relationship exists
  - 3. Nature of the relationship that the individual has with each commercial interest.
- E. For an individual with no relevant financial relationship(s), the learners will be informed that no relevant financial relationship(s) exist.
- F. The source(s) of all commercial support for the CE activity will be disclosed to learners in writing. When commercial support is “in-kind,” the nature of the support must be disclosed to learners.

“Disclosure” must never include the use of a trade name or a product-group message.
- G. All disclosure information will be provided to learners prior to the beginning of the educational activity. If disclosure information changes after the printing deadline, information must be disclosed verbally at the live activity prior to the faculty member’s presentation.

### **III. Resolution of Personal Conflicts of Interest**

- A. ONS shall identify all conflicts of interest for individuals in positions to control the content of an educational activity.
- B. A conflict of interest exists under the following conditions:
  - 1. The individual or individual's spouse or domestic partner has a financial relationship with a commercial interest and
  - 2. The individual has the opportunity to affect the content of CE about the products or services of that commercial interest.
- C. ONS shall resolve all conflicts of interest prior to presenting the educational activity, which may include a review of presentation slides, abstract, or article. ONS shall maintain a written procedure for resolution of conflicts of interest. A conflict of interest can be resolved by sufficiently modifying either of the two factors that create the conflict:
  - 1. Alter the relationship with the commercial interest so that the individual or individual's spouse or domestic partner no longer has a financial relationship; or
  - 2. Alter the individual's control over CE content about the products or services of the commercial interest so that the individual no longer controls content relevant to the commercial interest.

### **IV. Appropriate Use of Commercial Support for Continuing Education Activities**

- A. All commercial support associated with a CE activity must be given with the full knowledge and approval of ONS. No additional funds or in-kind support will be provided to the planning committee members, speakers, or authors beyond those defined in the budget.
- B. All commercial support expenditures must be documented and, upon request, provided to the commercial supporter.
- C. The Letter of Agreement shall define the terms, purposes, and conditions of the grant and shall be signed by the commercial interest, ONS, and or its affiliates. The originating source of the funds shall be considered the commercial interest for purposes of signing the agreement and acknowledgment.
- D. Expenditures Governing Planners, Speakers, Authors and Learners
  - 1. Planners, speakers, and authors shall be paid reasonable and customary honoraria rates and out-of-pocket expenses for travel-related expenses as per ONS Travel Policy.
  - 2. If speakers are listed on the agenda as faculty or conducting a presentation or session who participate in the remainder of an educational event as learners, their expenses can be reimbursed and honoraria can be paid for the presentation role only.

3. The authorization for a joint sponsor or other educational partner to pay honoraria or out-of-pocket expenses shall be documented between ONS and the joint sponsor and/or educational partner.
4. All funds to be paid to the planners, speakers, authors, or joint sponsors shall be stipulated in the Commercial Support Letter of Agreement and other documentation as applicable and paid directly by ONS.
5. Commercial support may be used to pay for ONS approved travel expenses and honoraria for employees and volunteers of the provider or educational partner.
6. Scholarships to permit oncology nurses to attend educational conferences are permissible as long as participant selection is made by ONS or its affiliates through an application process. ONS or an affiliate is solely responsible for the criteria and selection of recipients of all of its awards.

E. Social Events at Continuing Education Activities

1. Meals and receptions are appropriate social events at CE activities and shall not compete with or take precedence over the educational events. The budgets for these activities are based on local standard prices.
2. Social events must satisfy three criteria: a) The value of the event to the participant should be modest; b) The event should facilitate discussion among attendees and faculty members; and c) The educational part of the conference should account for a majority of the total time accounted for by the educational activities and social events together.
3. Meals, receptions, or other social events must not be the focus or the primary inducement to attend the CE activity, nor should information about them in activity invitations give the impression that they are more important than the content of the CE activity.
4. Guests may attend the CE activity or social events on a space-available basis and are required to pay for associated meal costs.

V. **Appropriate Management of Associated Commercial Promotion Within Continuing Education Activities**

- A. Arrangements for commercial exhibits or advertisements cannot influence planning of or interfere with the presentation, nor can they be a condition of the provision of commercial support for CE activities.
- B. Product-promotion materials or product-specific advertisements of any type are prohibited in or during CE activities. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided. Live (staffed exhibits, presentations) or enduring (printed or electronic advertisements) promotional activities must be kept separate from CE.
  1. For **printed CE**, advertisements and promotional materials will not be interleaved within the pages of the CE content. Advertisements and promotional materials may face the first or last pages of printed CE content as long as these materials are not related to the CE content they face and are not paid for by the commercial supporters of the CE activity.

2. For **computer-based CE**, advertisements and promotional materials will not be visible on the screen at the same time as the CE content and not interleaved between computer windows or screens of the CE content.
  3. For **audio and video recordings**, advertisements and promotional materials will not be included within the CE. There will be no 'commercial breaks.'
  4. For **live, face-to-face CE**, advertisements and promotional materials cannot be displayed or distributed in the educational space immediately before, during, or after a CE activity. Representatives of commercial interests are not permitted to engage in sales or promotional activities while in the space or place of the CE activity.
- C. Educational materials that are part of a CE activity, such as slides, abstracts, handouts and monographs, cannot contain any advertising or product-group messages, or use trade names exclusively or inappropriately.
- D. Print or electronic information distributed about the non-CE elements of a CE activity that are not directly related to the transfer of education to the learner, such as schedules and content descriptions, may include product-promotion material or product-specific advertisement.
- E. A provider cannot use a commercial interest as the agent providing a CE activity to learners (e.g., distribution of self-study CE activities, arranging electronic access to CE activities).
- F. Representatives of commercial interests may attend CE activities based on space availability as determined by ONS. Expected behavior includes, but is not limited to, the following:

Representatives of commercial interests

1. Cannot engage in detailing.
2. Cannot distribute product-promotional materials.
3. Cannot pay directly any speaker or author honoraria or reimbursement of out-of-pocket expenses.
4. Cannot provide any other payment to the planners of the activity, planning committee members, speakers, or authors, joint sponsor, or any others involved with the supported activity.
5. Must register with onsite activity planners and pay registration fee, if required.
6. Cannot participate by asking or answering questions or inducing participants to ask questions during the activity.
7. Cannot develop their own invitations.
8. Cannot pay registration and expenses for attendees.
9. Cannot transport faculty members to or from the activity.
10. Cannot have access to program rosters.

## G. Enduring Materials

1. The following information will be communicated to participants on all CE Enduring Materials.
  - a. Principal faculty, their credentials, and their conflict of interest disclosure
  - b. Medium or combination of media used
  - c. Method of nurse participation in the learning process
  - d. Estimated time to complete the educational activity
  - e. Dates of original release and the most recent review or update
  - f. Expiration date (date after which enduring material is no longer certified for credit)
  - g. Acknowledgment of commercial support (only at the beginning of the enduring material; no trade name or product-group message)
2. Commercial support representatives cannot distribute CE enduring materials or journal reprints under commercial support agreements. These business transactions must occur via separate agreements from the commercial support agreement.
3. No enduring materials in the form of Internet activities shall be posted on a pharmaceutical or device manufacturer's product website.
4. Links from CE activity websites to pharmaceutical and device manufacturers' product websites are permitted at the beginning or end of the educational content of a CE activity, but shall not be embedded in the educational content of the CE activity.
5. Advertising of any type is prohibited within the educational content of CE activities on the Internet, including, but not limited to, banner ads, subliminal ads, and pop-up window ads.

## H. Exhibits

1. Exhibits must be placed in a space separate from the educational activity space.
2. Live CE activities are prohibited in the exhibit hall.
3. A separate contract will be used for exhibit arrangements. That contract will contain the terms, conditions, and prohibitions regarding exhibits associated with the education activity.
4. Exhibit income will be accounted for separately from commercial support income.

## **VI. Developing Continuing Education Activities Without Commercial Bias**

- A. The content or format of a CE activity or its related materials must promote improvements or quality in health care and not a specific proprietary business interest of a commercial interest.
- B. Colors or other design elements that are part of a product-promotional campaign shall not be used in the promotional or educational materials for a CE activity discussing that product.
- C. Presentations must give a balanced view of therapeutic options. Use of generic names will contribute to this impartiality. If the CE educational material or content includes trade names, the trade names from several companies should be used, not just trade names from a single company. At the first occurrence, the generic name is listed followed by the trade name and company in parenthesis as indicated in the ONS Style Manual.
- D. CE activity content and format shall comply with the ONS Evidence-Based Education Guidelines.

**ONS Board Approved 10/05**