



Colorado Nurses Association (CNA)
Individual Educational Activity Process Manual
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2022-2024 CNA Nursing Continuing Professional Development Advisory Council

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Rev. 04/2022 CNA Individual Activity Process Manual

Introduction

This document provides step-by-step instructions on seeking approval to provide contact hours for nursing continuing professional development activities. We encourage you to plan the activity utilizing the steps in this document, rather than attempting to fit your activity into the forms. This will ensure that your activity provides evidence-based content to address the gap in knowledge, skills or practice of your target audience, meets the American Nurses Credentialing Center (ANCC) criteria and ultimately contributes to quality patient care with enhanced professional development for nurses. Please contact CNA at info@coloradonurses.org or the Accredited Approver Program Director (AAPD) at programdirector@coloradonurses.org at any time for guidance and support.

Notes:

1. All information in this document is obtained from the 2015 Primary Accreditation Approver Application Manual, along with updates published by ANCC. The Nurse Planner must have the authority to plan, implement, and evaluate nursing continuing professional development (NCPD) activities in adherence with ANCC Accreditation Program criteria.
2. The person at CNA accountable for the operation of the Accredited Approver Unit (APU) is the Accredited Approver Program Director. Please contact the AAPD at programdirector@coloradonurses.org for any assistance
3. Commercial entities cannot be providers or joint providers of nursing continuing professional development activities.
4. Employees of commercial entities cannot be planners or presenters for activities in which the content is related to the products or services of the company.

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Chapter 1: Individual Activity Applicant Process

ELIGIBILITY CRITERIA TO PROVIDE INDIVIDUAL NURSING CONTINUING PROFESSIONAL DEVELOPMENT ACTIVITIES

The Individual Activity Applicant is defined as an individual, organization, or part of an organization submitting an educational activity for approval from an Accredited Approver Unit. The Individual Activity Applicant must have at least one currently licensed registered nurse prepared at the baccalaureate degree level or higher who functions as the **Nurse Planner** for the activity. The Nurse Planner (NP) is responsible for ensuring that the educational activity is developed according to ANCC accreditation criteria.

Those interested in submitting a Nursing Continuing Professional Development (NCPD) activity for contact hour/s approval from an Accredited Approver must complete the eligibility verification process and meet all eligibility requirements. The Accredited Approver Program Director is responsible for ensuring that the applicant is eligible to apply.

ANCC Nursing Continuing Professional Development Program has endorsed and adopted New Consensus Standards for Integrity and Independence from the Accreditation Council for Continuing Medical Education (ACCME®) [Standards for Integrity and Independence in Accredited Continuing Education](#).

Eligibility criteria

- ▶ The organization must have a Nurse Planner who is involved in the entire process of planning, implementing, and evaluating the nursing continuing professional development activity.
- ▶ The Nurse Planner must have a current, valid unencumbered license as an RN with a baccalaureate degree or higher in nursing.
- ▶ The Nurse Planner plans the educational activity with at least one other planner, who needs to have appropriate subject matter expertise.
- ▶ The Nurse Planner is accountable to the AAPD at CNA for the planning, implementation and evaluation of the activity.
- ▶ The organization must **not** be a commercial interest as defined by Standards for Integrity and Independence from the Accreditation Council for Continuing Medical Education (ACCME®)
- ▶ The organization must be in compliance with all applicable Federal, State, and local laws and regulations that affect the organization's ability to meet ANCC accreditation criteria.
- ▶ The Nurse Planner must assure that the planned activity meets the definition of nursing continuing professional development, a learning experience that contributes to the professional development of the nurse and/or his/her ability to provide quality patient care. Activities designed/presented by a commercial entity to teach about a specific product are **not** acceptable.

THE APPLICATION

Retrieve the Individual Educational Activity Application and Financial Disclosure templates from the CNA website at <http://www.coloradonurses.org/education>. Review each document carefully. The Nurse Planner is responsible to complete each section of the application and will be contacted if there are any questions. The Accredited Approver Program Director (AAPD) of the Accredited Approver Unit (AAU) is the person accountable to the ANCC Accreditation Program to ensure that activity applicants are adhering to criteria and that the approver unit is appropriately providing information, guidance, and support. Any time you have questions or suggestions, please feel free to contact the AAPD. Your suggestions and feedback will help us continue to strengthen our processes.

Submit your completed application electronically ([Online Individual Educational Activity Approval Application](#)) to CNA 8 weeks before your scheduled activity date. This will allow time for a complete nurse peer review. Late applications may be accepted under certain circumstances and those submitted within less than six weeks of the activity will be charged an expedited fee. CNA reserves the right to refuse an application if there is not adequate time for peer review and applicant response to correct any deficiencies prior to the date of the activity. The individual activity application must be complete before review and/or approval.

COMPLETING THE APPLICATION

The individual educational activity template and Approved Education Disclosure Form template are intended to guide your planning process. Please use these resources to help you design your activity, rather than trying to retrofit your plan into the fields of the online application template.

Evaluation of Eligibility

- a. Review the criteria for eligible organization and confirm that your organization is appropriate.

Provider Information – Corporate Structure

- a. Name of Applicant Organization is the name of the *organization* offering the educational activity. This is the name that will appear on marketing materials and the certificate issued to participants.
- b. Nurse Planner – Provide the name, credentials, email address, phone number, and state of licensure for the nurse planner. For the nurse planner, be sure to document the credentials that support the minimum baccalaureate degree requirement. For example, if the person's credentials are a baccalaureate degree in education and a master's in nursing, and the degree granted by the graduate school is MS and not MSN, write it as MS (Nursing). This is the person CNA will hold responsible for adherence to all accreditation criteria.
- c. Check a box that reflects your organization type.
If there is not a box in Section 2 that describes your organization type, please contact the Program Director for guidance.

Statement of Understanding

- a. Enter the name of the applicant organization in the paragraph.
- b. The nurse planner must sign and date the statement.

Individual Activity Application

- a. Title of Individual Activity is the name of the educational activity as it will appear on marketing materials, learner materials, and the certificate
- b. Number of contact hours is the number of hours you desire to award for the learning activity. For “live” activities, calculate this number as follows:
 1. Include time spent in each session or part of the learning activity, including the time spent in completing any evaluation process. **Do not include time spent in welcome/introductions, breaks, lunch, or viewing of vendor exhibits.**
Example: Total minutes in activity = 240, minus minutes spent on breaks = 60, total minutes in activity = 180 divided by 60 = 3 contact hours for the activity.
 2. For enduring materials (e.g., web based individual learning modules, independent study booklets, videotapes), pilot testing is often the mechanism of choice to determine how It takes a select group of learners, representative of the target audience to complete the activity and its evaluation process. The average of those times is then used to determine the number of contact hours to be awarded to learners. Other methods of determining contact hours for enduring materials include use of evidence-based formulas related to word count and difficulty (such as the Mergener formula) or material or historical data in publications. Please contact CNA for additional information if needed.
 3. One **contact hour** is equal to 60 minutes of learning time.
 4. The unit of measure used in nursing continuing professional development (NCPD) is the contact hour, **not** the CEU. This is an important distinction, as the two terms do not mean the same thing. Please be sure that all your marketing pieces, learner materials and certificates correctly reference the contact hour.
 5. Contact hours may be rounded to the nearest quarter (i.e. 2.76 could be 2.75)
- c. Start date of activity and end date of activity
- d. Activity Type
 1. Provider directed, provider paced activities occur when the provider controls the content, time and pace of the activity. Learners participate in “real time” educational experiences (in person course, conference or webinar). Indicate the date(s) that the activity will be offered to learners and the location (city/state) where the event will be held. Please be aware that applications must be submitted in ample time for peer review and approval to

occur prior to the activity. Retroactive awarding of contact hours is not permitted. Rationale for the number of contact hours awarded should be identified as above, (e.g., real time for a live activity).

2. Provider directed, learner paced activities occur when the provider controls content, but learners can access the education at a time, place, and pace of their choosing. Examples might include independent study articles in professional journals, web-based learning on learning management systems, or archived webinars. For these events, please specify how you determined the number of contact hours you plan to award. See “number of contact hours” above and contact CNA with any questions about how to calculate contact hours for these types of activities. Note that these activities meet the definition of “enduring materials”, meaning that they exist over time. All enduring materials must be reviewed and revised at least once every renewal period (if you choose to renew the activity after the 2-year approval period) depending on the time- sensitivity and relevance of the content. Learners must be informed of the expiration date of enduring materials.
3. Learner – directed, learner paced: may be live, enduring material or blended.
4. Blended activities incorporate components of both “live” and “learner-paced” materials, although the event is not “enduring”. For example, a learner may be required to read an article prior to attending an activity and come prepared to discuss it. The learner can get contact hours for both parts of the learning experience. Specify how you determined the number of contact hours you plan to award for each component of the activity.

Activity Planning and Development

1. Description of the professional practice gap (PPG)

Professional practice gaps reflect the difference between what learners *currently* know, have the ability to do, or perform in practice compared to what they *should* know, have the ability to do, or perform in practice. An educational activity is designed to close that gap. Prior to developing an educational activity, it is necessary to identify the gap and determine the reason for its existence. What is the problem in practice or opportunity for improvement? A problem in practice may be that nurses are not using appropriate infection control practices, so the rate of patients getting catheter-acquired urinary tract infections is too high, compared to benchmark data. An opportunity for improvement may exist because learners are not aware of new guidelines for managing the care of stroke patients. The first step in planning an educational activity is to ask, “What is the professional practice gap, and why does it exist?” In this section, you identify the problem the activity is designed to address; this is not the “purpose” of the activity.

2. Evidence to validate the professional practice gap

Why is it that learners are not doing what they should be doing? Why do they do something they shouldn’t be doing? Do they know what to do? Do they not know how to do something? Are they unable to perform a skill? Do they not have the ability to transfer their knowledge and skills into the practice setting? Why is the current practice no longer acceptable? (e.g., new guidelines have been published). Briefly describe the evidence you have that supports why the practice gap exists.

3. Educational need that underlies the professional practice gap

Check the box/s indicating the level of learner need for the education: knowledge, skill, and /or practice. When multiple levels of need are identified, focus on those that are most fundamental to addressing the problem in practice. For example, learners must have knowledge prior to being able to develop appropriate skills. The level of educational need should be supported by your data in “A” and “B”. This decision will drive your outcome/s and evaluation methods.

Why do learners need this education?

- Is the PPG related to what they do not know (knowledge)?
- Is the PPG related to what they do not know how to do (skill)?
- Is the PPG related to what they do not know how apply or implement into practice (practice)?

4. Description of the target audience

Who will be participating in this educational experience? All nurses? Specific groups of nurses, like RNs in the Neonatal Intensive Care Unit? Will there be members of different professions – medicine, pharmacy, pastoral care, social work, and nursing? The target audience must include registered nurses.

5. Desired learning outcome

What will learners know or do differently once they complete the educational activity? How will this change close (or at least lessen) the professional practice gap that created the need for the activity in the first place? The outcome should be specific to the identified level of educational need – if the gap was in knowledge, what measurement will tell you that the learner has gained knowledge (example: score 100% on a post-test)? If the gap was in skill, what measurement will tell you that the learner has gained skill (example: demonstrate steps in completing a procedure with 100% accuracy)? Note that we do not require objectives for an educational activity, and an outcome is not the same thing as an objective. The outcome is a measurable statement of what the learner will know, show, or be able to do when he/she reaches the end of the activity.

6. Description of the evaluation method(s) – evidence that change in knowledge, skills, or practice of the target audience will be assessed

How will you determine that the educational activity has been successful? How will you measure change in knowledge? In skill? In intent to change practice? Explain what process or methods you will use to collect this data. You are required to evaluate the activity at the level of need that was identified in item “3” – knowledge, skill gain, or intent to change practice. You are not required to have a specific “evaluation form” for learners to complete, and a “one size fits all” evaluation tool will not suffice for every activity. Think instead about the specific questions you want to ask or the evidence you need (post-test or skills demonstration, for example) to show that the practice gap has been closed for the learner.

7. Description of evidenced – based content including the supporting references or resources

What will the activity look like? What content will be included? For example: “the session will be a one-hour webinar on the 2020 CDC Information for pediatric healthcare providers. It will include up-to-date information about children with suspected or confirmed Covid-19. If you are planning an event with multiple sessions or a conference, use this to describe the overall content for the sessions; do not provide content descriptions for each individual session.

a. Current supporting references and resources

List the references or resources used in developing the course content. Typically, references should be dated within the past 5-7 years in order to reflect best available current evidence on the topic.

8. Learner engagement strategies

How will learners be active (rather than passive) participants in the event? We know that learners are more likely to retain knowledge and transfer knowledge to practice if they are actively involved in the educational experience. To continue with the example above: “Learners will have the opportunity to engage in question/answer dialogue about the information, will take a 5-question quiz to assess their knowledge, and will participate in patient teaching role plays to assure that they are teaching current and correct information”. Please note that lecture and PowerPoint presentations by themselves are not examples of active learner engagement. This section is about learner engagement, not teaching methods.

Please address how the learner engagement is modified from a live presentation to an enduring program or one that is completely web based.

Attachments (attachments are indicated by turquoise highlight)

9. Number of contact hours awarded and calculation method. (Attach agenda if program is 2 hours or more)

Explain how the contact hour/s are calculated. Include the program agenda. Contact hours may be rounded to the nearest quarter hour.

You must keep a record of the number of contact hours earned by each participant.

10. Criteria for awarding contact hours

This is an important step that must be undertaken as part of the planning process. This helps to avoid on-the-spot dilemmas like someone arriving 15 minutes late for a one-hour learning activity and asking if he/she can still get contact hours. Check the item that applies to your activity or describe any “other”

plans. Once determined, the criteria for successful completion must be shared with the learners prior to the beginning of the educational activity.

11. Documentation of completion and / or certificate of completion must be attached to application (Attachment Required)

Certificate to be awarded to learners upon completion of the activity. The certificate must include:

- a. The title of the educational activity
- b. The date the certificate is issued.
- c. The number of contact hours awarded
- d. Space for the name of the learner
- e. Your activity approval statement: **This nursing continuing professional development activity was approved by Colorado Nurses Association, an accredited approver by the American Nurses Credentialing Center's Commission on Accreditation.**
- f. The name and address of the provider (web address is acceptable)

12. Standards for Integrity and Independence

Changes to Content Integrity Standards began January 1, 2022

The ANCC Content Integrity Standards will align more closely with the Accreditation Council for Continuing Medical Education (ACCME) beginning in 2022. Content Integrity Standards will now be Standards for Integrity and Independence in Accredited Continuing Education. This name and content change reflects the need to provide more accurate, balanced evidence-based information in providing interprofessional continuing education. The core principles of content integrity are similar and there will be some terminology changes.

What does this mean for you as a Nurse Planner offering nursing continuing professional development activities?

As the Nurse Planner for an individual educational activity awarding contact hours for completion of the activity, you are responsible and accountable for identifying, mitigating and disclosing relevant financial relationships for anyone who has the ability to control or influence the content of the activity.

Step 1 you have already determined your organization is eligible to provide nursing continuing professional development activities and award contact hours.

Step 2 for the Nurse Planner is to determine if the content of the activity is clinical or nonclinical. Clinical content, pertains to the care of patients, and you must identify, mitigate and disclose relevant financial relationships. If the content is non-clinical, such as leadership, preceptor education, or communication, you do NOT need to identify, mitigate or disclose. If there is any doubt, it is better to gather financial information and manage as applicable.

By checking the non-clinical box on the online for, I attest that the content of this activity will only

address a non-clinical topic (e.g., leadership or communication skills training) meaning there is no need to collect Relevant Financial Relationship/s, mitigate and or complete any disclosure to participants. The members of the planning committee with credentials and role are listed in section A.

If your content is a mix of clinical and non-clinical, you are required to collect relevant financial relationships from anyone involved in the clinical activities. Clearly define in your application who is involved in which section/s of your program.

Step 3: Embedded in the online application is space for up to four members of a planning committee where you can enter the name and credentials of each person involved with the activity, that person's role(s) in the activity, the name of any relevant commercial interest entity with which the individual has a relationship, and the type of relationship that person has. For larger planning committee or if you prefer, upload an attachment of this information. Options include your own spreadsheet or the Approved Education Disclosure Form from the CNA website. Individuals should disclose all financial relationships with ineligible companies within the past 24 months.

Step 4: The Nurse Planner will review the financial disclosure documentation and determine if there is a relevant financial relationship within the past 24 months related to the content of the activity you are planning. Document this on a mitigation worksheet (found on the website) or in the information of the four individuals on the application. You will then determine an appropriate mitigation strategy, identified on the Mitigation worksheet. This might include changing the individual's role in the activity, divesting the relevant financial relationships. If there are no relevant financial relationships, document that on the mitigation worksheet and develop a disclosure to learners.

Step 5 is disclosing relevant financial relationships and any mitigation to the participants prior to the beginning of the activity. Review the content integrity section on the Individual Activity Approval Application for content integrity standards instruction and wording for disclosure statements.

Please review the Content Integrity Education for Nurse Planners ([20 minute video](#)) on the CNA website page. Contact the Accredited Approver [Program Director](#) for any questions at any time

<https://www.coloradonurses.org/individual-educational-activity-application>

Other Resources:

<https://www.nursingworld.org/news/news-releases/2020/ancc-nursing-continuingprofessional-development-program-adopts--new-consensus-standards-for-integrityand-independence/>

[Accreditation Council for CME Announces New Standards for Integrity and Independence in Accredited Continuing Education | ACCME](#)

Webinar recording - <https://www.accme.org/video/implementing-new-standardsfor-integrity-and-independence-accredited-continuing-education>

<https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce>

Commercial Support Agreement: **(Attachment Required if Commercial Support received)**

Is this activity receiving commercial support?

Check “no” if no commercial support is being received; if “yes”, complete the additional information and attach a copy of the signed agreement. Contact CNA for questions about commercial support.

Definition: financial or in-kind support from ineligible companies

Activities that choose to accept commercial support are responsible for ensuring that the education remains independent of the ineligible company and that the support does not result in commercial bias or commercial influence in the education. See more information on ACCME.org standards

The support does not establish a financial relationship between the ineligible company and planners, faculty, and others in control of content of the education.

Key elements that must be addressed in the activity file:

- Appropriate management of commercial support, if applicable.
- Maintenance of the separation of promotion from education, if applicable.
- Promotion of improvements in health care and NOT proprietary interests of a commercial interest.

Required Disclosures to Learners **(Attachment Required)**

Evidence of disclosures provided to the learners. Learners must receive, prior to the beginning of the activity, information about the things listed here. The disclosure information can be provided on marketing material, an agenda, an introductory slide, or at the beginning of a syllabus or program guide. Provide the document that you will give to learners with information about:

- a. Your activity approval statement (the actual approval, not the “has been submitted” statement).
- b. Criteria for successful completion in order to earn contact hours (as stated in section “10” in your application)
- c. Presence or absence of relevant financial relationships for all individuals with ability to control content of a clinical content activity.

Sample 1: “There is no relevant financial relationships with ineligible companies for those involved with the activity to control content of this activity.”

Sample 2: “Dr. Yvonne Gbeho, PhD, NP-BC, is faculty, for this educational event, and has received a research grant from ABC Pharmaceuticals.

The relevant financial relationships listed for this individual has been mitigated.”

Sample 3: No disclosure required for non-clinical content activity.

- d. Name(s) of entities providing commercial support, if applicable.
- e. Expiration date – for enduring material only.
- f. Name(s) of joint providers, if applicable

SUBMITTING THE APPLICATION

1. Submit the application and all attachments electronically to [Online Individual Activity Application](#). Failure to submit a complete application will delay the review process and may result in the activity not being approved.
2. Send the application fee. See the fee structure on CNA website www.coloradonurses.org. An approval decision will not be rendered until the application fee is paid in full.
3. Timing: It is highly recommended that the application be submitted at least 8 weeks prior to the planned activity (or release of enduring material). This allows adequate time for peer review and submission of clarifying materials, if required. A late fee will be charged for activities submitted within less than 6 weeks prior to the learning activity, and there is no guarantee that the activity will be approved prior to the scheduled activity. CNA has the right to refuse late applications if there is not time for thorough review and an opportunity for response by the applicant prior to the beginning of the scheduled activity. (You may choose to delay the start of the activity if you wish to submit the application.)

CNA PEER REVIEW STEPS

1. The application will be reviewed by the AAPD to ensure that all required components of the application are present. Missing documentation will be requested if needed. The application will not be sent for peer review until it is complete.
2. The application is sent to at least one qualified peer reviewer, an RN with a minimum of a baccalaureate degree in nursing, who conducts a qualitative review in relation to accreditation program criteria.
3. You will be contacted if additional qualitative information is required or clarification of your application is needed.
4. A final decision is rendered by the AAPD. Typically, activities are reviewed and approved within one month depending on receipt of additional information that may be required.
5. Possible actions are:
 - a. **Approval for 2 years** – evidence supports the quality and integrity of the educational design, and you are able to present the activity as often as desired during the 2-year period of approval
 - b. **Denial** – evidence demonstrates that the application is not in adherence to criteria. An organization whose application has been denied has the right to appeal that decision. The

appeal procedure is available from the Accredited Approver Program Director upon request.

6. Once the approval decision is made, you will be notified within two working days by the CNA AAPD.
7. You will receive instructions for responding to CNA Approver Unit monitoring activities and submitting reports related to your activities.

Chapter 2: Addressing Specific Issues

Role of the nurse planner

The nurse planner is required to be a licensed registered nurse with a minimum of a baccalaureate degree in nursing (BSN/BAN or equivalent). This person **must** be actively involved in all phases of planning, implementation, and evaluation of the learning activity, and is the person CNA will contact if any questions about the application. The nurse planner consults with the AAPD of CNA (the accredited approver unit) as needed for guidance or assistance.

The nurse planner is accountable for maintaining current knowledge of criteria and for ensuring implementation of criteria to meet the needs of adult learners in the target audience for the learning activity. The nurse planner is also required to notify CNA of scheduled repeats of approved activities during the 2-year period of approval.

Conducting an analysis of practice gaps

Gap analysis data provides important information in determining the relevance of a proposed learning activity. Some questions to consider in conducting a gap analysis might be:

- What *issues* are we currently facing in our practice environment that could be improved by nursing continuing professional development? What is the “gap” in knowledge, skill, or application in practice? Where are learners now in relation to where they need to be in order for this issue to be addressed?
- What do nurses in the target audience *need* to learn about in relation to these issues?
- What do nurses in the target audience need, but *don’t know* that they need?
- Why do they need this information?
- How does this information relate to our particular learners or our particular practice environment?

On the basis of solid gap analysis data, an educational plan can be developed to “fill the gap” between where learners are and where they need to be. Measuring success in filling this gap then becomes the desired outcome of the activity.

Relevant Financial Relationships

Conflict of interest (COI) forms are no longer valid. The Nurse Planner is accountable to assess for any Relevant Financial Relationship/s with members of the planning committee and the program presenters.

A Relevant Financial Relationship occurs when a person with the ability to control content for an

educational activity has a financial relationship with a commercial entity, the products or services of which are relevant to the activity. Managing any financial relationship is a crucial step in ensuring the integrity of the activity. The first step is to assure that the nurse planner for the activity has no personal relevant financial relationship with an ineligible company.

Once the nurse planner's ability to be involved has been confirmed, he/she then validates the same information for all others. For each person, the key questions are: Does the person have the ability to control clinical content for the activity? Does the person have a financial relationship with a commercial entity? Is the relationship of a non-employee nature? (Employees of commercial entities are automatically excluded from participation if the topic of the activity relates to the products/services of the commercial entity.) Are the products or services of the commercial entity related to the topic of the educational activity? A yes answer to any of these questions requires further analysis by the nurse planner. A relevant financial relationship can be mitigated in a number of ways (see the Mitigation Worksheet for a listing of options), but mitigation MUST occur before a person is eligible to continue engagement with the activity. The nurse planner will need to identify on the application the mitigation strategy that was taken. The disclosure to the learners requires a statement that a financial relationship was identified. Who the individual is, what company they have a relationship with and only that this was mitigated. You do not have to disclose to the learners exactly how mitigation was accomplished.

*There are only three exceptions that allow for owners and/or employees of ineligible companies to participate as planners or faculty in approved continuing education.

1. When the content is not related to the business lines or products of their employer/company.
2. When the content of the approved 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.
3. 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.

Bias

Bias refers to the tendency to influence learners by showing partiality or favoritism for a particular product, service, or point of view. Learning activities are to be planned and implemented based on best available evidence and should avoid bias. Planners take steps in addressing bias through assessing for possible relevant financial relationship and by assessing and monitoring content integrity. Steps to ensure that bias does not occur might be reviewing speaker's slides, asking for balance in references & resources used in the presentation, having the speaker sign an agreement to present information fairly and impartially, or monitoring the presentation to validate that content integrity is being maintained.

Commercial support

Please see the ANCC or the ACCME Content Integrity Standards on the CNA website related to content integrity in the presence of commercial support. Commercial support is defined as a financial or in-kind

contribution for a learning activity given by a commercial interest (an entity that produces, markets, sells, or distributes goods or services consumed by or used on patients or an entity that is owned or controlled by a company that does those things). A pharmaceutical company or a manufacturer of wound dressing products would be considered a commercial entity. Commercial entity representatives are *not* permitted to serve on planning committees or as speakers/authors for nursing continuing professional development activities when the topic is related to the products of that company. Commercial support is given to the provider; the provider controls how money is spent to develop and implement the activity and is accountable to the commercial entity for appropriate use of funds. The commercial support provider cannot have any control over any aspect of the activity.

Jointly providing

Jointly providing relates to two or more organizations *working together* to plan, implement, and evaluate continuing nursing education activities. The provider unit's nurse planner is actively involved in all phases of the educational design process, and the provider is accountable for adherence to all accreditation program criteria. A representative of the joint provider organization serves on the planning committee for the activity. Marketing materials for the educational activity must prominently indicate the name of the provider, and the provider's name must be clear in all educational materials. The certificate is issued in the name of the provider. As noted in the earlier section on disclosures, the learner must be made aware of the names of organizations that have worked together to plan the activity.

Inter-professional Education

Increasingly, gap analysis data will show that the issue is not a nurse-specific issue, and that the problem in practice is impacted by several professional groups. Inter-professional education is that which is purposefully designed by the team and for the team (not simply inviting members of another professional group to attend an already planned activity). When inter-professional education is planned, sharing of documents and resources is encouraged. For example, a speaker would not need to complete separate relevant financial relationship form for medicine and nursing – one form will suffice. Collaborative planning and implementation of educational activities facilitates members of different professional learning from, with, and about each other to improve the quality of care provided by the team.

Vendors

Vendors are people or organizations that pay for exhibit space at educational activities. This is different than commercial support, although a vendor might be an organization that has also provided commercial support. There are no specific requirements about agreements with vendors, though any time money changes hands, it is good business practice to have written agreements.

From the perspective of education, the nurse planner is accountable for assuring that the integrity of the learning experience is not compromised. Vendor tables, therefore, should be separate from the

learning activity, and vendor goods or services should not be required to be viewed/used by learners. Promotional materials are to be kept separate from the learning activity. See the ANCC Content Integrity Standards, 2016, on the CNA web site for more details regarding working with vendors and/or product displays.

Recordkeeping

- a. Activity files must be retained for 6 years. See activity file list on CNA website.
- b. The application and attachments as described above become part of the activity file when submitted.
- c. Retain a copy of your approval letter and related correspondence with CAN
- d. After the activity, add to your file:
 - I. The summative evaluation data showing the effectiveness of the activity
 - II. List of participant names, credentials, and number of contact hours awarded to each person (it is also a good idea to have email addresses or some way to differentiate people with similar names – such as two Susan Smiths who attend your activities.
- e. Within 4 weeks after the activity, submit to CNA:
 - I. The summative evaluation data
 - II. Total number of participants
 - III. Number of RN participants
 - IV. Amount of commercial support money received, if any
 - V. Intent to repeat the activity; if so, when and where

Responding to monitoring requests

Accreditation criteria require that accredited approvers monitor the activities of individual activity providers on a regular basis, not just if or when the organization submits a new application. Participation in monitoring activities is required. CNA has the right to have a peer reviewer audit an activity – the activity provider may not charge a fee for the audit, and the peer reviewer is not expected to receive a certificate of completion. Failure to participate in monitoring processes as requested will result in suspension and/or revocation of activity approval.

Submitting reports

Reports are required to enable CNA to collect statistical data regarding your educational activity. These data are used to analyze the effectiveness of CNA, as an Accredited Approver Unit, in carrying out its mission of enhancing professional development of nurses through nursing continuing professional development. Additionally, data are shared, as required, with the ANCC accreditation program. ANCC in turn uses the information to evaluate the effectiveness of its role in promoting quality nursing continuing professional development globally. Evaluation data will be published and shared in the aggregate for both CNA and ANCC use. Report requirements will be specified at the time of activity approval or via email during the period of activity approval. Responses typically are requested within 15-30 days. As with the monitoring requests, failure to submit requested report data will result in suspension and/or revocation of activity approval. Note that if you repeat an activity during the 2-year period of approval, you must submit information about any repeat sessions as well as the initial session.

Responding to Inquiries and/or Complaints

Should a situation arise where the CNA Approver Unit and AAPD have a concern about your activity, you will be asked to provide explanations and/or evidence to address the concern. Examples may include data found on an organization's web site that is not in adherence to criteria or a complaint from a learner. If you are asked to respond to an inquiry or a complaint, you will be provided with detailed information about what is requested (although confidentiality of complainants will be maintained) and a specific time frame for your response. Failure to provide the required information or address the issue at hand will result in suspension and/or revocation of your activity approval.

Adhering to Federal, State, and/or Local Laws or Regulations

Your organization is expected to follow all applicable laws/rules that affect your ability to adhere to accreditation criteria. Evidence of violation of such laws/rules will result in suspension and/or revocation of your activity approval. Note that this includes copyright laws regarding use of published materials.

Issues of Nonadherence

The CNA Accredited Approver Unit reserves the right to suspend or revoke activity approval in situations where criteria are not followed, or, complaints are not resolved, laws/rules are not followed, or fees are not paid. Notification of suspension/revocation will occur by certified mail. If suspension and/or revocation occur, the organization must immediately cease awarding contact hours, representing itself as having activity approval, and using the activity approval statement.

Suspended organizations may apply for reinstatement within 120 days of the suspension date, based on evidence of resolution of the issue(s) in question. Failure to apply for reinstatement within the 120-day limit will result in revocation of activity approval. The organization whose activity approval status has been suspended and/or revoked may appeal the decision. Contact the AAPD at CNA for a copy of the appeal process.

References

American Nurses Credentialing Center. (2015). Primary Accreditation Approver Application Manual. Silver Spring, MD; Author.

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Harper, M., & Maloney, P. (2016). Nursing Professional Development Scope and Standards of Practice, 3rd ed. Chicago: Association for Nursing Professional Development.

Moore, D., Green, J., and Gallis, H. (2009). Achieving desired results and improved outcomes: integrating planning and assessment throughout learning activities. *Journal of Continuing Education in the Health Professions* 29(1), pgs. 1-15.

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