



Purpose and Intent

The purpose of this policy is to describe the separation, or firewall, established between ONSEdge services and those of its parent organization, the Oncology Nursing Society (ONS). The firewall policy also is meant to describe the procedures in place to ensure confidentiality between and among ONSEdge's corporate clients.

ONS is a 501(c)(6) professional society that serves oncology nurses. Among its services, ONS is accredited by the American Nurses Credentialing Center's Commission on Accreditation as a provider of continuing nursing education (CNE).

ONSEdge, Inc. is a for-profit subsidiary of ONS with a separate governance structure and management. ONSEdge provides promotional and consultative services to corporate clients as "work for hire." We respect the internal firewall policies our clients maintain and strive to tailor our services to meet each client's individual needs. We respect proprietary information and maintain strict confidentiality at all times. ONSEdge executes confidentiality agreements with all external suppliers. ONSEdge's revenue is based on fees for services and is not tied to clients' product sales.

Definition of Terms

Educational grants: Funding provided by commercial entities in support of independent, scientific, and community-based educational activities. These programs often contain off-label information.

Promotional programs: Events coordinated by companies to market their products. These programs contain on-label information only and are managed through "work for hire" agreements with the companies. Client company is responsible for content.

Content Development: The process of gathering scientific information used for a particular program.

Brand: Refers to a company's product brand name.

Service Offerings

ONSEdge provides a variety of promotional and consultative services. No service offerings of ONSEdge provide CNE credit, nor does ONSEdge develop programming for which it seeks CNE approval from an accredited provider. Clients seeking to develop CNE programming should contact the ONS Education Team.

ONS Programs that Offer CNE
National and Regional Conferences
Satellite Educational Symposia
Webcasts and podcasts
Independent Learning (monographs, CDROM, web-based learning activities)
Peer-reviewed publications

ONSEdge Services that Do Not Offer CNE
Consulting Services
Advisory Boards
Market Research
Focus groups
Promotional Ancillary Events
Speaker Bureaus
Sales Training
Printed and Web-Based Resources (On-Label)

Staff Structure

The *Chief Executive Officer of ONS* maintains overall responsibility for ONS and all affiliates and subsidiaries, including ONSEdge. The CEO is not involved in the day-to-day operations of ONSEdge.

The *Executive Director* is responsible for the day-to-day operations of ONSEdge. The executive director supervises ONSEdge staff, including staff responsible for sales, project management, and administration.

Project Teams

ONSEdge *Project Managers* are responsible for managing ONSEdge project and promotional projects. Individual project managers do not work on projects for competing clients, as determined by the executive director. In assembling a project team, project managers may utilize internal and external support services in such areas as editing, design,

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logistics, and administrative support. These support personnel do not influence content. *ONSEdge* has unique access to the knowledge and expertise of content experts from among the ONS membership. Such work is contracted independently, with written confidentiality agreements in place. Care is taken as well to ensure in writing that no conflicts of interest exist with respect to competing products or clients.

Internal Training

All *ONSEdge* staff members regularly receive training regarding the difference between educational and promotional activities and the importance of maintaining confidentiality between clients' information.

Infrastructure

ONSEdge operates within the ONS infrastructure and shares common physical locations and IT networks. *ONSEdge* is positioned on a different floor from the ONS CNE Approver Unit, without access to ONS' CNE files or database. Project managers are not housed in adjacent work stations.

While the entire team has access to a shared server and network, project managers and content providers do not have access to common project files, including paper files, when a potential conflict exists, as determined by the Executive Director.