

## Instructions

To be completed for each individual involved with the planning and/or implementation of the activity's content who has disclosed financial relationship(s) with \*ineligible companies. \* Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Note: this form must be completed prior to the event.

## Form Questions

### Identification and Mitigation of Relevant Financial Relationships

**Name of individual with the Relevant Financial Relationship:**

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**Activity Date:**

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**Their role:**

- Speaker
- Planner
- Faculty
- If other, please explain:

**Person Completing this form:**

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**Date:**

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**Your role in this activity (check all that apply):**

- Course Director
- CME Committee Chair
- Executive Director of CME
- If other, please explain:

**Step 1. Does the session not need relevant financial relationships to be mitigated or disclosed for the accredited continuing education?**

**If the education, activity, or session meets one of the following exclusion criteria, THEN YOU DO NOT NEED to identify, mitigate, or disclose relevant financial relationships for the accredited continuing education.**

- It will only address a non-clinical topic (e.g., leadership or communication skills training).
- It is for a learner group that is in control of the content entirely (e.g., spontaneous case conversation among peers).
- It is a self-directed educational activity where the learner will control their educational goals and report on changes that resulted (e.g., learning from teaching, remediation, or a personal development plan). When accredited providers serve as a source of information for the self-directed learner, they should direct learners only to resources and methods for learning that are not controlled by ineligible companies.
- NONE of the above apply. Please go to Step 2.

**Step 2: If the individual is an owner or employee of an ineligible company\* they are excluded from participating as planners, faculty, or other roles**

**The individual is not an owner or employee of an ineligible company. Please go to Step 3.**

**The individual is an owner or employee. There are only three exceptions that allow for owners and/or employees of ineligible companies to participate as planners or faculty in accredited continuing education**

- When the content of the activity is not related to the business lines or products of their employer/company.
- When the content of the accredited 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.
- NONE of the above apply (the owner or employee will be excluded from the activity).

**Step 3. Does a relevant financial relationship exist? A relevant financial relationship exists if the following three conditions are met for the individual who will be in control of the content of the education.**

- A financial relationship, in any amount, exists between the person in control of content and an \*ineligible company.
- The financial relationship existed during the past 24 months.
- The content of the education is related to the products of an ineligible company with whom the person has a financial relationship.

If all three conditions are met, then a mitigation of the financial relationship needs to be completed. Please go to Step 4 which covers mitigation.

Disclosure of the presence or absence of all relevant financial relationships to the learner must be done prior to the activity.

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**Step 4: Choose a mitigation strategy for each person who has a relevant financial relationship and implement that strategy before the person assumes their role.**

**Using the lists below, identify which mitigation strategy(ies) will be used for all persons with relevant financial relationships who control the educational content of the educational activity.**

**You may select multiple strategies but be sure to use strategies appropriate to the role(s) that each person has. You can also identify your own strategies for mitigation.**

**Mitigation steps for Planners (choose at least one):**

- Recusal from controlling aspects of planning and content with which there is a financial relationship
- Peer review of planning decisions by persons without relevant financial relationships
- Divest the financial relationship
- Use other methods (please describe):

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**Mitigation steps for Faculty and Others (choose at least one):**

- Attest that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adhering to evidence-based practice guidelines)
- Peer review of content by persons without relevant financial relationships
- Divest the financial relationship
- Use other methods (please describe):

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[\*\*+ Add New Question\*\*](#)

✔ = Correct Answer