**Steps for the Identification, Mitigation, and
Disclosure of Relevant Financial Relationships**

**If any of the following statements apply to the education, you do not need to identify, mitigate, or disclose relevant financial relationships for this approved continuing education:**

* It will only address a non-clinical topic (e.g., leadership, precepting, or communication skills training).

**STEP 1**

Before you begin planning your education, collect information from all members of the planning committee, faculty, and others who would be in positions to control content.

**Ask them to provide information about all their financial relationships with ineligible companies over the previous 24 months.**

There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies.

* **Ensure you use this definition:** Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.
* **NOTE:** Use the Template for Collecting Information about All Financial Relationships from Planning committee, Faculty, and Others.

**STEP 2**

Review all relationships and **exclude owners and employees of ineligible companies from participating as a nurse planner, faculty, or other roles** unless the educational activity meets one of the exceptions listed below.

* **If the exception(s) exists for** members of the planning committee, faculty, and others who would be in positions to control content **– go to step 3.**

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 of the activity 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 methodologiesof 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.

**STEP 3**

**Determine** which financial relationships are ***relevant*** to the content of the continuing education activity.

**Mitigate** those relevant financial relationships to prevent commercial bias.

**Disclose** the presence or absence of all relevant financial relationships to learners prior to the activity.

* Determine **relevant financial relationships** for all who will be in control of educational content. (**NOTE:** Financial relationships are relevant if the following three conditions are met for the individual who will control content of the education.):
	+ A financial relationship, in **any amount**, exists between the person in control of content and an ineligible company.
	+ The content of the education is related to the products of an ineligible company with whom the person has a financial relationship.
	+ The financial relationship existed during the past **24 months**.
* **Mitigate** relevant financial relationships prior to individuals assuming their roles in the educational activity. (**NOTE:** Use the **Worksheet for the Identification and Mitigation of Relevant Financial Relationships of Planners, Faculty, and Others** to implement mitigation strategies appropriate to their role(s) in the educational activity.)
* Before the learner engages in the education, **disclose** to learners the presence or absence of relevant financial relationships for all persons in control of content. (**NOTE:** Use the **Examples of Communicating Disclosure to Learners** to share all of the appropriate information before the activity.)

**OPTIONAL: SAMPLE LETTER TO EXPLAIN WHY FINANCIAL RELATIONSHIP INFORMATION IS COLLECTED**

At the beginning of your planning process, **you may** use the sample language below to communicate with prospective planners, faculty, and others who may be in control of content for the educational activity. It is important to identify financial relationships before activity planning begins so that relevant financial relationships can be mitigated in a manner that is appropriate to each person’s role.

|  |
| --- |
| Dear Prospective Planning Committee/Faculty Member:We are looking forward to having the opportunity to include you as a <proposed role for person (e.g., planner, faculty, reviewer, etc.>) for the activity that we are submitting for approval to award nursing contact hours, <activity title or working title and date/location information, if appropriate>.**Why am I receiving this communication?**We appreciate your help in partnering with us to follow accreditation guidelines and help us create high-quality education that is independent of commercial interest/ineligible organization influence. In order to participate as a person who will be able to control the educational content of this approved NCPD activity, we ask that you disclose all financial relationships with any ineligible companies that you have had over the past 24 months. We define **ineligible companies** as those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. There is no minimum financial threshold; you must disclose all financial relationships, regardless of the amount, with ineligible companies. We ask you to disclose regardless of whether you view the financial relationships as relevant to the education. For more information on the Standards for Integrity and Independence in Accredited Continuing Education, visit **accme.org/standards**.**Why do we collect this information?**Healthcare professionals serve as the trusted authorities when advising patients; therefore, they must protect their learning environment from industry influence to ensure they remain true to their ethical commitments. Many healthcare professionals have financial relationships with ineligible companies. By identifying and mitigating relevant financial relationships, we work together to create a protected space to learn, teach, and engage in scientific discourse, free from influence from organizations that may have an incentive to insert commercial bias into education.**What are the next steps in this process?**After we receive your disclosure information, we will review it to determine whether your financial relationships are relevant to the education. NOTE: the identification of relevant financial relationships does not necessarily mean that you are unable to participate in the planning and implementation of this educational activity. Rather, the accreditation standards require that relevant financial relationships are mitigated before you assume your role in this activity.To help us meet these expectations, use the form we have provided to share all financial relationships you have had with ineligible companies during the past 24 months. This information is necessary for us to move to the next steps in planning this continuing education activity. If you have questions about these expectations, contact us at [insert contact information] |

**TEMPLATE FOR COLLECTING INFORMATION ABOUT ALL FINANCIAL RELATIONSHIPS FROM NURSE PLANNERS, CONTENT EXPERT, FACULTY, AND OTHERS**

**(This form replaces the former COI form.)**

**To be completed by the Nurse Planner or designee:**

Name of Individual and Credentials:

Title of NCPD activity:

Date and location of NCPD activity:

Individual’s prospective role(s) in NCPD activity:

Identify the prospective role(s) that this person may have in the planning and delivery of this educational activity (choose ALL that apply):

|  |  |  |
| --- | --- | --- |
| 🔾 Nurse Planner | 🔾 Content Expert | 🔾 Teacher / Faculty Instructor |
| 🔾 Author, Writer | 🔾 Content Reviewer | 🔾 Other |

The Standards for Integrity and Independence require that we disqualify individuals who refuse to provide this information from involvement in the planning and implementation of approved continuing education. Thank you for your diligence and assistance. Questions can be sent to apply@psna.org.

**To be completed by Nurse Planner, Faculty, or Others Who May Control Educational Content**

Disclose **all financial relationships** that you have had in the past 24 months with ineligible companies (see definition below).

For each financial relationship, enter the name of the ineligible company and the nature of the financial relationship(s). There is no minimum financial threshold; we ask that you disclose all financial relationships, regardless of the amount, with ineligible companies. Disclose all financial relationships regardless of the potential relevance of each relationship to the education.

|  |  |  |
| --- | --- | --- |
| **Name of Ineligible Company**An **ineligible company** is any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.For specific examples of ineligible companies visit accme.org/standards.  | **Nature of Financial Relationship** Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options **MUST** be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies **MUST** be disclosed by the principal or named investigator even if that individual’s institution receives the research grant and manages the funds. | **Has the Relationship Ended?**If the financial relationship existed during the last 24 months, but has now ended, please put **YES** in this column. This will help the education staff determine if any mitigation steps need to be taken. |
| Example: IV Company | RN Research Coordinator and Educator | YES |
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🔾 In the past 24 months, I have not had any financial relationships with any ineligible companies.

**I attest that the above information is correct as of this date of submission.**

**Date:**

**Use this template to collect all relevant financial relationships of prospective planners, faculty, and others who may control educational content before they assume their role in the education**. As an alternative to collecting disclosure information for each activity, if your planners and faculty are a set group of individuals, you might choose to collect this information on an annual or periodic basis and ask the individuals to update if any information changes during the year.

**WORKSHEET FOR THE MITIGATION OF IDENTIFIED RELEVANT FINANCIAL RELATIONSHIPS OF NURSE PLANNERS, CONTENT EXPERTS, FACULTY, AND OTHERS**

Use this sample worksheet to identify and mitigate relevant financial relationships that you have identified for planners, faculty, and others who will control educational content for your education activity. Please make sure that: (1) the mitigation strategy is appropriate to the person’s role in the activity and (2) that mitigation is implemented before each person takes on their role.

**STEP 1**

Review collected information about financial relationships and *exclude owners or employees of ineligible companies* from participating as planners or faculty.

After collecting allfinancial relationships from prospective planners, faculty, and others, exclude any persons who are owners or employees of ineligible companies. Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

For information about exceptions to this exclusion, refer to page 2, step 2 for exceptions or the accme.org/standards.

**STEP 2**

Determine **relevant financial relationships**.

Review the information for all persons not excluded in Step 1 and determine whether each person’s financial relationships with ineligible companies are relevant to the content of the education you are planning. Financial relationships are relevant if the following three conditions are met for the prospective person who will control content of the education:

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

**STEP 3**

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; however, use strategies **appropriate to the role(s)** that each person has. You can also identify your own strategies for mitigation.

**Mitigation steps for faculty and others**

*(choose at least one)*

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

**Mitigation steps for planners**

*(choose at least one)*

* **Divest** the financial relationship
* **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
* Use **other methods *–*** describe the method

**STEP 4**

**Document** the mitigation strategy(ies) you used for each person with a relevant financial relationship.

(Use the following form.)

|  |  |  |  |
| --- | --- | --- | --- |
| **A** | **B** | **C** | **D** |
| **NAME OF PERSON** | **ROLE(S) IN ACTIVITY** | **STEP(S) TO MITIGATE RELEVANT FINANCIAL RELATIONSHIP** | **DATE IMPLEMENTED** |
| *Example: Dr. Jones PhD, MSN, BSN* | *Planning Committee member / speaker*  | *Peer review of content by persons without relevant financial relationships* | *June 1, 2021* |
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**EXAMPLES OF COMMUNICATING DISCLOSURE TO LEARNERS**

You may use the sample language below as evidence of information disclosed to learners in the activity file. Disclosure must be provided to learners **before** engaging with the approved education.

**What gets disclosed to learners before the educational activity?**

 **Example**

“Nicolas Garcia, faculty for this educational event, is on the speakers’ bureau for XYZ Device Company.”

“Dr. Yvonne Gbeho, faculty, for this educational event, has received a research grant from ABC Pharmaceuticals.”

“All of the relevant financial relationships listed for these individuals have been mitigated.”

**Example**

“Xin Lee, FNP, faculty for this educational event, has no relevant financial relationship(s) with ineligible companies to disclose.”

“Ruth Hopkins, Dr. Maryam Elbaz, and Ken Sanders, authors of this educational activity, have no relevant financial relationship(s) with ineligible companies to disclose.”

“None of the planning committee for this educational activity have relevant financial relationship(s) to disclose with ineligible companies whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.”

**If there ARE relevant financial relationships:**

Disclose name(s) of the individuals, name of the ineligible company(ies) with which they have a relevant financial relationship(s), the nature of the relationship(s), and a statement that all relevant financial relationships have been mitigated.

**If there are NO relevant financial relationships:**

Inform learners that nurse planners, content experts, faculty, and others in control of content (either individually or as a group) have no relevant financial relationships with ineligible companies.

**NOTE:** You do not need to make disclosures for the three exceptions above.

**NOTE:**

* If commercial support is received, the provider must also disclose to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education.
* Disclosure to learners must not include ineligible companies’ corporate or product logos, trade names, or product group messages.
* It may be helpful to include definitions of terms to learners to support their understanding of your processes (e.g., ineligible companies, relevant financial relationships, etc.)