

## Activity Director's Key Steps Info Sheet

### Identification, Mitigation, and Disclosure of Relevant Financial Relationships

#### **STEP 1:**

Before you begin planning your educational activity, collect information from all planners, faculty, and others who will be in positions to control content. Ask them to provide information about **all** their financial relationships with ineligible companies over the previous **24 months**.

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.

Use the **Template for Collecting Information about All Financial Relationships from Planners, Faculty, and Others**. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies.

#### **STEP 2:**

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

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.

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

**A.** Determine relevant financial relationships for all who will be in control of educational content.

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 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.

**B.** Mitigate relevant financial relationships prior to individuals assuming their roles in the education. 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.

**C.** Before the learner engages in the educational activity, disclose to learners the presence or absence of relevant financial relationship for all persons in control of content: Use the **Examples of Communicating Disclosure to Learners** to share all the appropriate information before the activity.

#### **Note for Activity Director & Activity Staff:**

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