Worksheet for the Mitigation of Identified Relevant Financial Relationships

Applies to anyone who controls content of nursing continuing professional development educational activities (Includes: Nurse Planners, Content Experts, Faculty, and others)

**Step 1**: Review collected information about **financial relationships** and exclude owners or employees of **ineligible companies**

from participating as planners or faculty.

* After collecting all financial 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, reselling, or distributing healthcare products used by or on patients. \*

\*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 used of medical devices, and do not recommend whether or when a device is used.

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

**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 provided 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.
  + Select multiple strategies as needed to be sure to use strategies are appropriate to the role(s) of each person.
  + Identify your own strategies for mitigation if necessary.

**List #1:** 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 – make sure you describe the method

**List #2:** 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 – make sure you describe the method

**Step 4:** Document the mitigation strategy(ies) you used for each person with a relevant financial relationship.

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| Name of Individual and **CREDENTIALS** | Individual’s role in  activity  *(NP, content expert, additional planner)* | Planning committee member? (Y/N) | Name of ineligible company with a relevant financial relationship **if any**  None if none. | Nature of relevant financial relationship **if any.**  None, if none. | Step(s) taken to mitigate relevant financial relationships **if any.** |
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| *Add more rows as needed.* |  |  |  |  |  |