

Worksheet for the Identification and Mitigation of Relevant Financial Relationships of Content Controllers



Step 1

Review collected information about financial relationships and exclude owners or employees of ineligible companies from participating as content controllers (e.g. faculty, planners, etc.)

After collecting ALL financial relationships from prospective planners, faculty, and others, exclude any individuals 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.



Step 2

Determine relevant financial relationships.

Review the information for all individuals not excluded after STEP 1 and determine whether each individual's financial relationships with ineligible companies are relevant to the content of the CME activity. Financial relationships are relevant if all three conditions are met for the individual who will control content of the activity:

- A financial relationship, in ANY AMOUNT, exists between the individual and an ineligible company.
- The financial relationship exists during the past 24 months.
- The content of the education is related to the products of an ineligible company with whom the individual has a financial relationship.



Step 3

Choose a mitigation strategy for each individual with a relevant financial relationship and implement the strategy before the individual assumes their role.

Using the lists below, identify which mitigation strategy will be used for individuals with relevant financial relationships who control educational content for the activity. Multiple strategies may be used. The strategy used should be appropriate to the individual's role.

Mitigation Steps for Planners:

- **Divest** the financial relationship(s)
- **Recusal** from controlling aspects of planning and content with which there is a financial relationship
- **Peer review** of planning decisions by individuals without relevant financial relationships
- Other method

Mitigation Steps for Faculty & Others:

- **Divest** the financial relationship(s)
- **Peer review** of content by individuals without relevant financial relationships
- Other method



Step 4

Document mitigation strategy(ies) used for each content controller with a relevant financial relationship.

We have a [content controller spreadsheet](#) or [peer review checklist](#) that you're more than welcome to use to capture this information.

Communicating Disclosure to Learners

Use the sample language below to provide disclosure to learners in a format that can be verified during the accreditation review process. Disclosure must be provided to learners before engaging in the continuing education activity.

Examples for Providing Disclosure to Learners

If there are NO relevant financial relationships:

Inform learners that planners, faculty and other content controllers (either individually or as a group) do not have any relevant financial relationships with ineligible companies.

Example Disclosures:

- Dr. John Doe has no relevant financial relationship(s) with ineligible companies to disclose.
- Dr. John Doe and Dr. Michaela Quinn have no relevant financial relationship(s) with ineligible companies to disclose.
- None of the content controllers for this activity have any relevant financial relationships to disclose with ineligible companies.

If there ARE relevant financial relationships:

Be sure to include the following in the disclosure:

- Name(s) of the individuals
- Name of the ineligible company(ies) with which the individual has a relevant financial relationship(s)
- The nature of the relationship(s)
- The statement that all relevant financial relationships have been mitigated.

Example Disclosures:

Dr. John Doe is on the speakers' bureau for Merck. Dr. Jane Smith has received a research grant from Pfizer. All of the relevant financial relationships listed for these individuals have been mitigated. All other individuals controlling content for this CME activity don't have any relevant financial relationships to disclose.

Note:

- If commercial support is received, the CME 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 (e.g., ineligible companies, relevant financial relationships, etc.).