REVISITING STANDARD 3
IDENTIFYING, MITIGATING AND DISCLOSING RELEVANT FINANCIAL RELATIONSHIPS

June 2024
HOW COMFORTABLE ARE YOU WITH THE NUANCES OF STANDARD 3?

- [x] I know what I’m doing
- [x] I feel somewhat confident
- [x] I have no clue what I’m doing – help!
WHERE DO YOU PERSONALLY STRUGGLE THE MOST?

- Collecting disclosure information
- Identifying relevance of financial relationships
- Mitigating relationships
- Understanding who’s considered an employee/owner of an ineligible company
- Understanding who’s considered an ineligible company
- Proper disclosure to learners
HERE’S WHERE INDIANA PROVIDERS STAND WITH GENERAL NON-COMPLIANCE

<table>
<thead>
<tr>
<th>Provider #</th>
<th>Standard 3 Disclosure/Mitigation</th>
<th>Standard 4 Commercial Support</th>
<th>Program Analysis</th>
<th>Analyzes Change</th>
<th>Formats</th>
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<td><strong>TOTALS</strong></td>
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<td>4</td>
<td>6</td>
<td>7</td>
<td>1</td>
</tr>
</tbody>
</table>

Standard 4 is the only measure that does not apply to all accredited CE
WHAT WE KNOW

Many healthcare professionals have financial relationships with ineligible companies.

However, these relationships must not be allowed to influence accredited CE.
WE’RE GOING TO STUDY HOW WE PREVENT THIS INFLUENCE THROUGH THE VARIOUS SECTORS OF STANDARD 3
1\textsuperscript{st} SECTOR: IDENTIFICATION, WHICH INVOLVES “COLLECTION”

You must collect disclosure from all individuals in control of educational content.

- **Planners:**
  - CME Staff, Course Director, CME Committee
- **Faculty Presenters:**
  - Speakers, Panelists, Moderators
- **Reviewers:**
  - Peer reviewers, CME Staff
WHAT DO YOU COLLECT?

All of their financial relationships with ineligible companies (commercial interests).

- Regardless of the amount
- Regardless of their view of the relevance of the relationship to the education*
- Held within the prior 24 months

*The CME provider is now fully responsible for determining relevancy. (per the updated Standards)
DISCLOSURE MECHANISMS

A Disclosure Form is one mechanism that providers can use.

Other mechanisms could include:

• Collecting the information verbally and recording it in a spreadsheet, table, or database
• Collecting disclosure information electronically (i.e., via e-mail, web-based form, or database)
FOR EACH FINANCIAL RELATIONSHIP, DISCLOSURE INFORMATION MUST INCLUDE:

• Name of ineligible company
• Nature of the relationship
  – Consultant
  – Speakers Bureau
  – Grant/Research Support
  – Principal Investigator
  – Board Member
  – Stock Shareholder (privately held vs. publicly traded)
  – Employee/Owner
  – Other
**WHAT IF A RELATIONSHIP HAS ENDED?**

If a relationship has ended within the last 24 months, you no longer have anything to mitigate.

However, you should still disclose the financial relationships to your learners.

<table>
<thead>
<tr>
<th>Nature of Financial Relationship</th>
<th>Name of Ineligible Company(s)</th>
<th>Has the relationship ended?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultant</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>Speaker's Bureau</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>Grant/Research Support</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>Principal Investigator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Board Member</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>Stock Shareholder</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>(Privately held, self-managed)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stock Shareholder</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>(Publicly traded, pension/mutual fund and/or self-managed)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Full-time/part-time Employee/Owner*</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
<tr>
<td>Other (Describe):</td>
<td>Click here to enter text.</td>
<td>□  Yes</td>
</tr>
</tbody>
</table>
MANAGING THE USE OF EMPLOYEES/OWNERS OF INELIGIBLE COMPANIES

These individuals must be excluded from controlling content or participating as planners or faculty in accredited education.

The ACCME allows three exceptions to their exclusion! (Please use with caution)
WHAT ARE THE EXCEPTIONS?

EXCEPTION #1
When the content of the activity is not related to the business lines or products of their employer/company.
EXCEPTION #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.
EXCEPTION #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.
DOES STOCK OWNERSHIP CREATE AN EMPLOYEE/OWNER RELATIONSHIP?

If an individual is an owner of stock in a company that is **privately held**, that individual would be considered by ACCME to be an owner of the company. **This relationship is not mitigatable.**

If stock/stock options are in **publicly traded companies**, and the financial relationships are relevant to the CME content, those relationships are mitigatable and should be disclosed to learners.

**NOTE:**
ACCME does not require individuals who control CME content to disclose **diversified mutual funds**, but any other stocks or stock options should be disclosed to the provider.
Let's take a look at how these forms of stock ownership differ.

**Publicly Traded Company**
A company that has sold all or a portion of itself to the public via an initial public offering, meaning shareholders have a claim to part of the company's assets and profits.

They can tap the financial markets by selling stock to raise capital.

**Privately Held Company**
The company is owned by its founders, management, or a group of private investors.

A private company cannot dip into the public capital markets and must rely on private funding.
ISMA NOW DIFFERENTIATES STOCK OWNERSHIP ON OUR FINANCIAL DISCLOSURE FORM

<table>
<thead>
<tr>
<th>Nature of Financial Relationship</th>
<th>Name of Ineligible Company(s)</th>
<th>Has the relationship ended?</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Consultant</td>
<td>Click here to enter text.</td>
<td>□ Yes</td>
</tr>
<tr>
<td>□ Speaker's Bureau</td>
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<td>□ Grant/Research Support</td>
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<td>□ Stock Shareholder</td>
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<td>□ Yes</td>
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<td>*(Privately held, self-managed)</td>
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<td>Click here to enter text.</td>
<td>□ Yes</td>
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<tr>
<td>□ Full-time/part-time Employee/Owner</td>
<td>Click here to enter text.</td>
<td>□ Yes</td>
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<tr>
<td>□ Other <em>(Describe):</em></td>
<td>Click here to enter text.</td>
<td>□ Yes</td>
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</tbody>
</table>
ARE PATENT HOLDERS WHO RECEIVE ROYALTY PAYMENTS FROM INELGIBLE COMPANIES CONSIDERED TO BE OWNERS OF THOSE COMPANIES?

NO

The ACCME advises that individuals who receive patent royalties from ineligible companies are **not** considered owners or employees of those companies.

Those individuals may control content in accredited continuing education, if the appropriate steps are taken to mitigate.
IDENTIFICATION INVOLVES “DETERMINING RELEVANCY”

The accredited provider is responsible for identifying relevant financial relationships.

- Faculty/speakers can no longer self determine relevancy -

Individuals must disclose regardless of their view of the relevance of the relationship to the education.
WHEN ARE FINANCIAL RELATIONSHIPS “RELEVANT?”

Standard 3.3 states:

“Financial Relationships are relevant if the educational content an individual can control is related to the business lines or products of the ineligible company.”

This is plural and not singular
I want you to consider the process you use to determine which financial relationships are relevant to the educational content.

LET'S HEAR FROM YOU
ALWAYS DO YOUR ONLINE RESEARCH OF THE INELIGIBLE COMPANY(S)
If the ineligible company has a product line related to the topic, but the subject matter is not related to the planner or speaker’s area of practice/expertise……………

• Is there a conflict of interest?
• Is the relationship with the company relevant?
• Do you need to disclose the relationship to the learners?
Before a person assumes their role in a CME activity, you must take steps to prevent all those with relevant financial relationships from inserting commercial bias into the educational content.
STEPS FOR PLANNERS ARE SLIGHTLY DIFFERENT THAN FOR PRESENTERS

And would occur before planning begins.
MITIGATION FOR PLANNERS

Those individuals making decisions related to the scope and direction of the content, educational goals, identification of practice gaps and needs, selecting speakers, authors, and reviewers.

If a planner or reviewer discloses a financial relationship, here are options that can be considered to mitigate the relationship.

- **End the financial relationship** (including having ended the relationship within 24 months)
- **Recuse individual** 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
MITIGATION FOR FACULTY PRESENTERS

Those individuals who are teaching, writing, producing and delivering education. If a faculty presenter discloses a financial relationship, here are options that can be considered to mitigate the relationship.

- **End the financial relationship** (including having ended the relationship within 24 months)
- **Recuse individual** from controlling aspects of planning and content with which there is a financial relationship
- **Peer review of content** by persons without relevant financial relationships
- **Attest that clinical recommendations are evidence-based and free of commercial bias**
MITIGATION IN GENERAL

• Planners and other content experts can help determine relevance of relationships, if necessary.

• Keep in mind that simply monitoring the CME content for commercial bias at the time of the presentation is not an acceptable mitigation mechanism.

• When providers identify relevant relationships, they must direct authors/teachers to take actions to assist in the mitigation.
DOCUMENT THE STEPS TAKEN TO MITIGATE RELEVANT FINANCIAL RELATIONSHIPS

You will be asked about this at reaccreditation time during PIP activity review.
## COI Mitigation Spreadsheet for Use with Individual Activities

<table>
<thead>
<tr>
<th>Name of Individual</th>
<th>Individual's Role(s) in Activity</th>
<th>Name of Commercial Interest(s)</th>
<th>Nature of Relationship(s)</th>
<th>Mechanism(s) implemented to resolve conflict of interest appropriate to role(s) in the activity</th>
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Record the steps you took in a spreadsheet, table, or database.
COI Mitigation Form

This is another mechanism some providers utilize to record the steps taken.

<table>
<thead>
<tr>
<th>Step 1</th>
<th>Owners/Employees of Ineligible Company (IC)</th>
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<tbody>
<tr>
<td>☐</td>
<td>Not an employee/owner of IC (go to Step 2)</td>
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<tr>
<td>☐</td>
<td>Planning Committee employee/owner of IC (choose from below):</td>
</tr>
<tr>
<td>☐</td>
<td>No planning has occurred – individual is fully recused from committee</td>
</tr>
<tr>
<td>☐</td>
<td>Planning has occurred – activity will not be accredited</td>
</tr>
<tr>
<td>☐</td>
<td>Faculty/speaker employee/owner of IC (choose from below):</td>
</tr>
<tr>
<td>☐</td>
<td>Faculty/speaker is not allowed to present</td>
</tr>
<tr>
<td>☐</td>
<td>Activity will not be accredited</td>
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<tr>
<th>Step 2</th>
<th>Conflict of Interest (COI)</th>
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<tbody>
<tr>
<td>☐</td>
<td>No relevant financial relationship (no COI)</td>
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<td>☐</td>
<td>Potential COI – presenter (choose from below):</td>
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<tr>
<td>☐</td>
<td>Presentation materials reviewed to ensure fair balance, scientific objectivity and no commercial bias</td>
</tr>
<tr>
<td>☐</td>
<td>Presenter will refrain from making recommendations on topics of COI</td>
</tr>
<tr>
<td>☐</td>
<td>All recommendations for patient care are based on peer review data</td>
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<tr>
<td>☐</td>
<td>Discontinue contracted services that create financial relationship – must disclose such relationship to audience for 24 months</td>
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<tr>
<td>☐</td>
<td>Individual excluded from content creation and delivery, was replaced with another presenter</td>
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<tr>
<td>☐</td>
<td>Activity will not be accredited</td>
</tr>
<tr>
<td>☐</td>
<td>Potential COI - planner</td>
</tr>
<tr>
<td>☐</td>
<td>Planner recused from planning content relevant to reported COI</td>
</tr>
<tr>
<td>☐</td>
<td>Another non-conflicted planner will participate in planning to ensure fair balance; non-conflicted planner will review proposed content to ensure it is free from potential bias; non-conflicted planner will oversee selection of faculty</td>
</tr>
</tbody>
</table>
NEW EXCEPTIONS TO DISCLOSURE

Accredited providers do **not** need to identify, mitigate, or disclose relevant financial relationships for any of the following activities:

- Education that is **non-clinical in nature**, or
- Education where the learner group is in control of content, such as **spontaneous case conversations among peers**.
Later in the day we will be discussing the Quick Tool for Planning Accredited CE for these exceptions. It is part of ACCME’s new Toolkit.

https://www.accme.org/standards-resources
The ACCME’s new Toolkit for the Standards for Integrity and Independence in Accredited Continuing Education contains resources that were meant to assist providers in their transition to the new Standards.

The initial collection of tools focuses on:

- Standard 1: Ensuring Content is Valid

These 2 standards are applicable to all accredited providers, whether or not commercial support is received.

Use of resources in the Toolkit is completely optional.
Disclosure to learners must occur in a format that can be verified at the time of accreditation, before they engage with the education.
STANDARD DISCLOSURE TO LEARNERS MUST INCLUDE:

(either individually or as a group)

• The names of the individuals with relevant financial relationships
• The names of the ineligible companies with which they have relationships
• The nature of the relationships
• A statement that all relevant financial relationships have been mitigated
• The absence of relevant financial relationships (if applicable)
IDENTIFY INELIGIBLE COMPANIES BY THEIR NAME ONLY

Disclosure to learners must not include ineligible companies’ corporate or product logos, trade names, or product group messages.
METHODS OF DISCLOSURE

You may use a variety of the following:

• Disclosure Grid
• Disclosure Slide @ beginning of presentation
• Disclosure Statement on flyer and/or other promotional materials (i.e., website)
• Verbal Disclosure to audience during presentation
While disclosure may be given *verbally* to participants, CME providers must be able to supply the ISMA with written verification that appropriate verbal disclosure occurred (especially if this is the only method you use).

A representative of the provider who was in attendance at the time of the education must attest in writing:

- That verbal disclosure did occur, and
- Itemize the content of the disclosed information, or that there was nothing to disclose
Is there a financial disclosure statement that should be provided to learners for non-clinical program topics?

• **No, accredited providers do not need to identify, mitigate, or disclose relevant financial relationships for non-clinical topics.**

However, ISMA does actually provide a statement, which reads as follows:

“There are no relevant financial relationships with an ineligible company to identify, mitigate or disclose because the content of this activity is non-clinical in nature.”
OTHER USEFUL TOOLS IN ACCME’S NEW TOOLKIT
Key Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships

A Checklist for CME Staff providing an overview of the 3-step process and things that are important to consider.

STEP 1: Before you begin planning

STEP 2: Reviewing disclosures and excluding owners/employees of ineligible companies

STEP 3: Determining which relationships are relevant
Note for Continuing Education 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.

At the beginning of your planning process, use the sample language below to communicate with prospective planners, faculty, and others who may be in control of content for the education. 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.

Dearest Prospective Planner/Faculty Member:

We are looking forward to having the opportunity to invite you as a [proposed role for person—e.g., planner, faculty, reviewer, etc.] in the accredited continuing education, [insert activity title or working title and date/location information, if appropriate].

Why am I receiving this communication?

[Insert Accredited Provider Name] is accredited by the [Accreditor]. We appreciate your help in partnering with us to follow accreditation guidelines and help us create high-quality education that is independent of industry influence. In order to participate as a person who will be able to control the educational content of this accredited CE 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, please visit [acmec.org/standards].

Why do we collect this information?

Since healthcare professionals serve as the trusted authorities when advising patients, 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. Please 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, please 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 in order for us to be able to move to the next steps in planning this continuing education activity. If you have questions about these expectations please contact us at [provider contact information].

Sample Letter to Explain Why Financial Relationship Information is Collected

At beginning of the planning process, sample language CME providers can use to communicate with prospective planners, presenters and reviewers.

Tells them:

- Why they are receiving the communication
- Why the CME Office is collecting this information
- What the next steps are in the process of mitigation
### Template for Collecting Information about All Financial Relationships from Planners, Faculty, and Others

**To be completed by education staff.**

**Name of Individual:**

**Title of Continuing Education:**

**Date and location of Education:**

**Individual’s prospective role(s) in education**

- Planner
- Teacher, Instructor, Faculty
- Author, Writer
- Reviewer
- Other

**As a prospective planner or faculty member, we would like to ask for your help in protecting our learning environment from industry influence. Please complete the form below and return it by:**

The ACCME Standards for Integrity and Independence require that we disqualify individuals who refuse to provide this information from involvement in the planning and implementation of accredited continuing education. Thank you for your diligence and assistance. If you have questions, please contact us at: **

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

Please 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. You should disclose all financial relationships regardless of the potential relevance of each relationship to the education.

**Enter the Name of Ineligible Company**

An ineligible company is any entity whose primary business is producing, marketing, selling, reselling, or distributing healthcare products used by or on patients.

For specific examples of ineligible companies visit accme.org/standards.

**Example:** ABC Company

**Enter the 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 should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if the 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 check the box in this column. This will help the education staff determine if any mitigation steps need to be taken.

<table>
<thead>
<tr>
<th>Relationship Ended?</th>
<th>Yes</th>
<th>No</th>
<th></th>
<th></th>
</tr>
</thead>
</table>

☐ 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.

**Note for Continuing Education Staff**

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.

- [ ] Yes
- [ ] No

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**Template for Collecting Information about All Financial Relationships from Planners, Faculty and Others**

Basically, a sample Financial Disclosure Form that you may adopt, if desired.

Compare your process or forms to this sample template to collect the right information about financial relationships.
ISMA Financial Disclosure Form

ISMA did not adopt this form but did update ours to reflect changes in the new Standards.

- Removed mention of and request for disclosure of spouse/partner
- Removed columns in grid for Self vs. Spouse/Partner and added “Has relationship ended?”
- Changed look-back on relationships from 12 to 24 months
- Changed section on Relevant Financial Relationships to All Financial Relationships
- Changed term “commercial interest” to “ineligible company”
- Changed term “resolved” to “mitigated”
- Updated “Statements/Rules of ISMA Content Validation” on form to include:
  - Although accredited continuing education is an appropriate place to discuss, debate, and explore new and evolving topics, these areas need to be clearly identified as such within the program and individual presentations. It is the responsibility of the accredited provider to facilitate engagement with these topics without advocating for, or promoting, practices that are not, or not yet, adequately based on current science, evidence and clinical reasoning.

- Within Glossary of Terms, updated:
  - Definition of “Commercial Interest,” now called “Ineligible Entity”
  - Definition of “Relevant Financial Relationships”
Worksheet for the Identification and Mitigation of Relevant Financial Relationships of Planners, Faculty, and Others

Note for Continuing Education Staff
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 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. For information about exceptions to this exclusion, see accme.org/standards.

STEP 2: Determine relevant financial relationships.
Review the information for all persons whom you did not exclude 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 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.

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 but are sure to use strategies appropriate to the person(s) that each person has. You can also identify your own strategies for mitigation.

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 (please describe):

Mitigation steps for faculty and others (choose at least one):
- Divest the financial relationship
- Peer review of content by persons without relevant financial relationships
- Admit 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 (please describe):

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

<table>
<thead>
<tr>
<th>NAME OF PERSON</th>
<th>ROLE(S) IN ACTIVITY</th>
<th>STEP(S) TAKEN TO MITIGATE RELEVANT FINANCIAL RELATIONSHIP</th>
<th>DATE IMPLEMENTED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example: Dr. Jones</td>
<td>Planner</td>
<td>Recusal from topic/faculty selection</td>
<td>10/28/21</td>
</tr>
</tbody>
</table>

Takes the place of the Flowchart for the Identification and Resolution of Personal Conflicts of Interest

You may adopt this form to record/document how you mitigated individual relationships, if you desire.
What did the old Flowchart for Resolution of Personal Conflicts of Interest look like?

(established in 2017)
Examples of Communicating Disclosure to Learners

Uses sample terminology for disclosure statements when there are no relevant relationships

AND

disclosure statements when there are relevant relationships, in a format that can be verified at the time of reaccreditation.

Remember that disclosure must be provided to learners before engaging with accredited education.
Guidance for Planners, Authors, and Faculty: Ensuring Clinical Content is Valid

A sample template to communicate expectations to planners, authors and faculty in the planning stages to ensure valid clinical content for the accredited education they will be developing.

ISMA communicates the majority of this information within the “Statements/Rules of ISMA Content Validation” on pg. 2 of our Financial Disclosure Form.
An example of a tool to help facilitate peer review to ensure that clinical content is valid.

The questions direct reviewers to share feedback about each of the requirements that comprise Standard 1.

ISMA will continue to use our own existing Content Review Form.
We encourage you to refer to this checklist to help ensure you’ve not forgotten anything in implementing the new Standards (which were effective 1/1/2022).


It contains all the factors for you to consider in:

• Reviewing your processes.....
• Changing your forms............
• Communicating to faculty......

A hard copy is also available in your handout packet.
Group Discussion