Weill Cornell Medicine
Continuing Medical Education

Weill Cornell CME Identification and Mitigation of Relevant Financial Relationships

For more information, visit
accme.org/standards

NAME Of ACTIVITY:

Note for Course Director/ICR

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, re-selling, 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 be sure to use strategies **appropriate to the role(s)** that each person has. You can also identify your own strategies for mitigation.

Mitigation steps for planners *(choose at least one)*

- ✓ **A. Divest** the financial relationship
- ✓ **B. Recusal** from controlling aspects of planning and content with which there is a financial relationship
- ✓ **C. Peer review** of planning decisions by persons without relevant financial relationships
- ✓ **D.** Use **other methods** *(please describe)***:**

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Mitigation steps for faculty and others *(choose at least one)*

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

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

A	B	C	D
NAME OF PERSON	**ROLE(S) IN ACTIVITY**	**STEP(S) TAKEN TO MITIGATE RELEVANT FINANCIAL RELATIONSHIP**	**DATE IMPLEMENTED**
Example: Dr. Jones	*Planner*	*Recusal from topic/faculty selection*	*10/28/21*