**WNA CEAP - Nurse Planner Mitigation Worksheet – Part A: Nurse Planner Process**

**Key Steps for Identification & Mitigation of Relevant Financial Relationships**

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| **NOTE:** The Nurse Planner (NP) is responsible for completion of this process/documentation worksheet to identify and mitigate relevant financial relationships for everyone who controls the content of an educational activity (i.e., nurse planner, planners, presenters, enduring material content developers, etc.). Be sure mitigation strategies are appropriate to the person’s role and that mitigation strategies are implemented before each person begins their role in the activity.  |

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| **NOTE: If any of the following statements apply to your educational activity, you do not need to identify, mitigate, or disclose relevant financial relationships for that activity:*** It will only address a non-clinical topic (e.g., leadership, precepting, or communication skills training).
* It is for a learner group that is in control of the content entirely (e.g., spontaneous case discussion conversation among peers).\* (RARE)
* This does not include Regularly Scheduled Series such as Tumor Boards, M&M Conference, etc.
* It is a self-directed educational activity where the learner will control their educational goals and report on changes that resulted.\* (RARE)

***\*******Contact WNA for further guidance if you think this describes the educational activity you will be planning.*** |

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| **STEP 1: Before planning the educational activity**, **collect information** from everyone in a position to control the content of an educational activity (i.e., nurse planner, planners, presenters, enduring material content developers, etc.). * Ask each person to provide information about **all** their financial relationships with ineligible companies over the previous **24 months**. There is no minimum financial threshold; individuals must disclose all financial relationships with ineligible companies, regardless of the amount.
* **You must use this definition when you collect the information**: “Ineligible companies are those whose primary business is producing, marketing, selling, reselling, or distributing healthcare products used by or on patients.” (Using a WNA Disclosure Form meets this requirement.)
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| **STEP 2: Review all relationships and exclude owners and employees of ineligible companies** from participating in any educational role unless the activity meets one of the three exceptions listed below.* Refer to the Standards ([www.accme.org/standards](http://www.accme.org/standards)) for the definition and examples of ineligible companies.
* Still not sure? Research the company (use internet or other sources) and determine if the company produces, markets, sells, resells, or distributes 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. If these exceptions do not exist, the owner/employee MUST be excluded:

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 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 use of medical devices, and do not recommend whether or when a device is used. (*Note - contact hours cannot be given for vendor/exhibitor interactions*.)  |

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| **STEP 3:** **Determine which financial relationships are relevant to the content of the educational activity.** Financial relationships are relevant if the following three conditions are all 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 has existed at any time during the past 24 months.
* The content of the education is related to the products or business lines of an ineligible company with whom the person has a financial relationship.

**A. Document on the Nurse Planner Mitigation Worksheet all relationships listed on the Disclosure Forms of those in control of content.** **B. Analyze each relationship listed. Is the company listed ineligible? If yes, is the relationship relevant?** *(Note: NP does not analyze their own form.)* |

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| **STEP 4:** **Mitigate relevant financial relationships.** Mitigation steps include at least one of the following: |
| Planners: * Divesting the 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
* Other methods – Must describe method in detail.
 | Presenters/Faculty/Others:* Divesting the relationship
* Peer review of content by person without relevant financial relationships
* Attestation that clinical recommendations are evidence-based and free of commercial bias (e.g., peer-reviewed literature, adheres to evidence-based guidelines) [See also Part B of this form.]
* Other methods – Must describe method in detail.
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| **STEP 5: Document the mitigation strategies** used for each person with a relevant financial relationship in Part B of this **Nurse Planner Mitigation Worksheet** or note if the listed relationship was determined by the NP to be not relevant.See examples in Part B of this form.  |

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| **STEP 6: Disclose to learners,** prior to content delivery, the presence or absence of relevant financial relationships for all persons in control of content: * Name
* Name of ineligible company with which there is a relationship.
* Nature of the relationship
* Statement that all relevant financial relationships have been mitigated. (NEW)

*See Toolkit “Examples of Communicating Disclosure to Learners” to develop and document your disclosures to learners.* |

**WNA CEAP - Nurse Planner Mitigation Work Sheet - Part B: Documentation**

**Identification & Mitigation of Relevant Financial Relationships**

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| **Activity Title:** |  | **Date(s):** |  |

**The Nurse Planner (NP) uses this worksheet. Keep it in the Activity File. You will need to submit it as part of your application for approval or renewal.**

* **Follow the Process (Key Steps) listed in Part A of this form.**
* **Refer to the Standards as needed:** [**www.accme.org/standards**](http://www.accme.org/standards)**.**
* **Refer to the Standards FAQ for information about navigating rules on stocks and stock options:** [**https://accme.org/faq/10236**](https://accme.org/faq/10236)**.**
* **The Nurse Planner does not analyze their own disclosure information. Someone else familiar with the Standards does this (e.g., a planner, PNP, APU staff.)**
* **For presenters with relevant financial relationships, WNA CEAP suggests a method other than, or in addition to, attestation only.**

[ ]  No one in control of content listed any relationships on their Disclosure Form. (If this box is unchecked, complete the table below.)

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| **Name** | **Role(s) in Activity** | **Company Listed**  | **Relationship Listed** | **Step(s) taken to mitigate relevant financial relationships *or* “Not Relevant [NR]”** | **Date Implemented *or* N/A** |
| **Example:** Antoinette Zar, DNP | Presenter | DME Unlimited *(Ineligible company)*  | Owner | Removed from any role in activity.  | December 1, 2021 |
| **Example:** Ava Zanaczek, MD | Presenter  | American Cancer Society *(eligible company)*  | Advisor | NR  | N/A |
| **Example**: Andres Zavac PhD, RN | Planner  | Pharma-Care*(ineligible company)*  | Researcher | No planning of related content & no participation in faculty selection | November 9, 2021 |
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