

North Carolina Nurses Association

Mitigation Worksheet

Based on Standards for Integrity and Independence in Accredited Continuing Education

Only complete if relevant financial relationships with ineligible companies have been identified.
The Nurse Planner cannot mitigate their own financial relationships.

STEP 1: Review collected information about financial relationships (may use *Financial Disclosure Form*) 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.

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.

- When the content of the activity is **not related** to the business lines or products of their employer/company
- 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
- 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

For information, refer to the *Key Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships*

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:

- 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.

Mitigation steps for planners (choose at least one)	Mitigation steps for faculty and others (choose at least one)
✓Divest the financial relationship	✓Divest the financial relationship
✓Recusal from controlling aspects of planning and content with which there is a financial relationship (Remove/revise the role of the individual so that the relationship is no longer relevant)	✓Peer review of content by persons without relevant financial relationships (nurse planner, planning committee member, content reviewer, etc.)
✓Peer review of planning decisions 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	✓Use other methods –make sure you describe the method

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

Name of Person	Activity Role(s)	Describe Relevant Financial Relationship include ineligible company name and nature of relationship.	Step(s) Taken to Mitigate Relevant Financial Relationship (if any) or N/A	Date
Ex. Sally Smith	Speaker	Speaker's Bureau for XYZ Company	Reviewing slides and Nurse Planner will attend session	9/1/2021

Note for Nurse Planner- Refer to the *Key Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships* document for disclosure examples.