

## Key Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships for CME Compliance in Educational Sessions (ACCME Standard 3)

- **STEP 1: Prior to planning your educational session, collect information from all planners, faculty, and others who would be in positions to control content.** Ask them to provide information about all their financial relationships with \*ineligible companies over the previous 24 months.
  - *(ACCME defines Ineligible companies are 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; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies.**
- **STEP 2: Review the disclosed relationships and exclude owners and employees** of ineligible companies from participating as planners, faculty, or other roles unless the educational activity meets one of the exceptions listed below.
  - There are only three exceptions that allow for owners and/or employees of ineligible companies to participate as planners or faculty in accredited 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 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.
    - ✓ 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.
- **STEP 3: Determine relevant financial relationships for all who will be in control of educational content.**
  - ✓ 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
- **If applicable MITIGATE any relevant financial relationships prior to individuals assuming their roles in the education using the mitigation strategies:**

### 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



- ✓ 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 (please describe): \_\_\_\_\_

**ALL FINANCIAL DISCLOSURES MUST BE SUBMITTED BY: JULY 7, 2025**

- Before the learner engages in the educational session, disclose to learners the presence or absence of relevant financial relationship for all persons in control of content. (NRG includes a complete disclosure list with all meeting information, on the website and the Attendee Hub)

### Manage Commercial Support Appropriately:

Accredited providers are responsible for ensuring that education is separate from marketing by ineligible companies—including advertising, sales, exhibits, and promotion—and from nonaccredited education offered in conjunction with accredited continuing education. (ACCME Standards 4-5)

Educational materials that are part of accredited education (such as slides, abstracts, handouts, evaluation mechanisms, or disclosure information) must not contain any marketing produced by or for an ineligible company, including corporate or product logos, trade names, or product group messages.

**Draft or final Presentation Slides must be reviewed for CME compliance prior to the start of the educational activity.**

**ALL SLIDES ARE DUE FOR COMPLIANCE REVIEW BY: JULY 9, 2025**

### ACCME COMPLIANCE VIDEOS

All planning members and individuals with control over educational content must review the following brief video resources recommended by ACCME to support compliance and best practices.

<https://accme.org/resource/case-scenarios-when-it-acceptable-use-owners-and-employees-ineligible-companies/>

<https://accme.org/resource/examples-of-content-that-is-is-not-related-to-the-business-lines-of-the-ineligible-company/>

For All Committee members/Planners/Speakers:

<https://accme.org/resource/your-role-in-maintaining-trust-in-accredited-cme-video-for-planners-faculty-authors-and-reviewers/>

Please ensure your teams are informed and aligned with these requirements as you proceed with planning. Let us know if you have any questions or need clarification.