

# Disclosure Mitigation Form

(To be completed by a course director or planner who do not have any financial relationships with ineligible companies)

Activity Name

Speaker/Planner or  
Moderator Name

Financial Relationship  
Disclosed

- Steps Taken:
1. The disclosed relationship is not relevant to the presentation (check and sign/date the form).
  2. The disclosed relationship is relevant to the presentation but it is not with an ACCME/ANCC defined Ineligible Companies listed on page 2 (check and sign/date this form).
  3. The disclosed relationship is relevant and with an Ineligible Company(s) - listed on page 2 (check and proceed to question 4).

**4. Is the speaker/planner/moderator the employee or owner of an Ineligible Company(s) - listed on page 2**

Yes: This relationship cannot be mitigated. The individual cannot be part of the planning. The presentation will not receive credit. (there are just 3 circumstances when credit is allowed, see page 2)

No: Proceed to question 5a or 5b.

Yes, but it meets one of the exceptions on page 1

The exception:

**5 a. Mitigation steps for speaker/moderator (Select which mitigation strategy(ies) will be used):**

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 below):

Other method used:

**5b. Mitigation steps for planners (Select which mitigation strategy(ies) will be used):**

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, prior to the implementation of the activity.

Use other methods (please describe below):

Other method used:

Course Director or  
Planner Reviewer  
Name & Signature

Date

## **Eligible Companies That May Be Accredited:**

Ambulatory procedure centers  
Blood banks Diagnostic labs that do not sell proprietary products  
Electronic health records companies  
Government or military agencies  
Group medical practices  
Health law firms  
Health profession membership organizations  
Hospitals or healthcare delivery systems  
Infusion centers Insurance or managed care companies  
Nursing homes Pharmacies that do not manufacture proprietary compounds  
Publishing or education companies  
Rehabilitation centers  
Schools of medicine or health science universities Software or game developers

## **Ineligible Companies That Cannot Be Accredited** (*Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients*):

Advertising, marketing, or communication firms whose clients are ineligible companies  
Bio-medical startups that have begun a governmental regulatory approval process  
Compounding pharmacies that manufacture proprietary compounds  
Device manufacturers or distributors  
Diagnostic labs that sell proprietary products  
Growers, distributors, manufacturers or sellers of medical foods and dietary supplements Manufacturers of health-related wearable products  
Pharmaceutical companies or distributors  
Pharmacy benefit managers  
Reagent manufacturers or sellers

### ***Exceptions:***

- a. When the content of the activity is not related to the business lines or products of their employer/company.
- b. 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.
- c. 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.

To view the Standards for Integrity and Independence Guidelines:

[Standards for Integrity and Independence in Accredited Continuing Education](#)