**Identification of Relevant Financial Relationships Algorithm**Relevant Financial Relationship Disclosure Form (“RRDF”)

*Does the educational activity content meet any of these criteria?*

(1) Non-clinical in nature (leadership, communication skills, etc.)

(2) Learner controlled content (e.g., spontaneous case discussion among peers—does NOT include Regularly Scheduled Series)

(3) Self-directed, individual improvement plan—focused content (e.g., clinical improvement plan and self-report on changes)

**YES**
-Proceed with activity planning for contact hours
-Complete the RRDF Sections 1, 2, and 3.

**NO**
-Collect from all in control of content (planners, presenters, content developers, all other faculty) ALL financial relationships with ineligible companies for the past 24 months.

*Any financial relationships reported from anyone in control of content?*

**NO**
-Proceed with activity planning for contact hours
-Complete the RRDF Sections 1, 2, and 3.

**YES**
*Ineligible Company?*1

**NO**
-Proceed with activity planning for contact hours-Complete the RRDF Sections 1, 2, and 3.

**YES**
*Owner or employee?*2

**NO; Affiliation Only5**
-Proceed with activity planning for contact hours-Complete the RRDF Sections 1, 2, 3, 4, and 5.6
-Disclosure will include that relevant financial relationships were mitigated.

**YES; Owner or Employee**
*Exclusions present?*3

**YES**
-Proceed with activity planning for contact hours-Complete RRDF Sections 1, 2, 3, 4, and 5.4
-Disclosure will include that relevant financial relationships were mitigated.

**NO**
-Exclude presenter/planner/other faculty from any role for the activity.
-Complete the RRDF Sections 1, 2, 3, 4, and 5.
-Proceed with planning for contact hours. The person who was excluded may not have any role.

4,6: Mitigation may include: not offering nursing contact hours; review of presentation; attestation.
See list of mitigation strategies on RRDF.

5: Refer to the nature of financial relationship examples with ineligible companies listed on the RRDF. These include stock ownership, consulting, advisory positions, etc.

Source: Accreditation Council for Continuing Medical Education (2020). Standards for Integrity and Independence in Accredited Continuing Education.
Information retrieved from: https://accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce
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1: **Ineligible companies** are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. Examples include.
 -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 cell 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 manufacture or sellers

**Eligible companies** include those whose mission and function are (1) providing clinical services directly to patients; or (2) the education of healthcare professionals; or (3) serving as fiduciary to patients, the public, or population health; and other organizations that are not otherwise eligible. Examples include:
 -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

3: Owners and employees can participate as planners or faculty if at lease **one** of these **exclusions** is met:
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 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 safe and proper use of medical devices and do not recommend whether or when a device is used.

2: Non-employees (consultants, etc.) get a 1099 for taxes.

Employees get a W-2 for taxes.