

Hello:

We are looking forward to having the opportunity to include you as a presenter in our accredited continuing education program.

Why am I receiving this communication?

The University of Florida College of Pharmacy Continuing Education Department is accredited by the ACPE. We appreciate your help in partnering with us to follow accreditation guidelines and help us create high-quality education that is independent of industry influence. **In order to participate as a person who will be able to control the educational content of this accredited CE activity, we ask that you disclose all financial relationships with any ineligible companies that you have had over the past 24 months. We define ineligible companies as 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; you must disclose all financial relationships, regardless of the amount, with ineligible companies.** We ask you to disclose regardless of whether you view the financial relationships as relevant to the education.

Why do we collect this information?

Since healthcare professionals serve as the trusted authorities when advising patients, they must protect their learning environment from industry influence to ensure they remain true to their ethical commitments. Many healthcare professionals have financial relationships with ineligible companies. By identifying and mitigating relevant financial relationships, we work together to create a protected space to learn, teach, and engage in scientific discourse free from influence from organizations that may have an incentive to insert commercial bias into education.

What are the next steps in this process?

After we receive your disclosure information, we will review it to determine whether your financial relationships are relevant to the education. Please note: the identification of relevant financial relationships does not necessarily mean that you are unable to participate in the planning and implementation of this educational activity. Rather, the accreditation standards require that relevant financial relationships are mitigated before you assume your role in this activity.

To help us meet these expectations, please use the form we have provided to share all financial relationships you have had with ineligible companies during the past 24 months. This information is necessary in order for us to be able to move to the next steps in planning this continuing education activity.

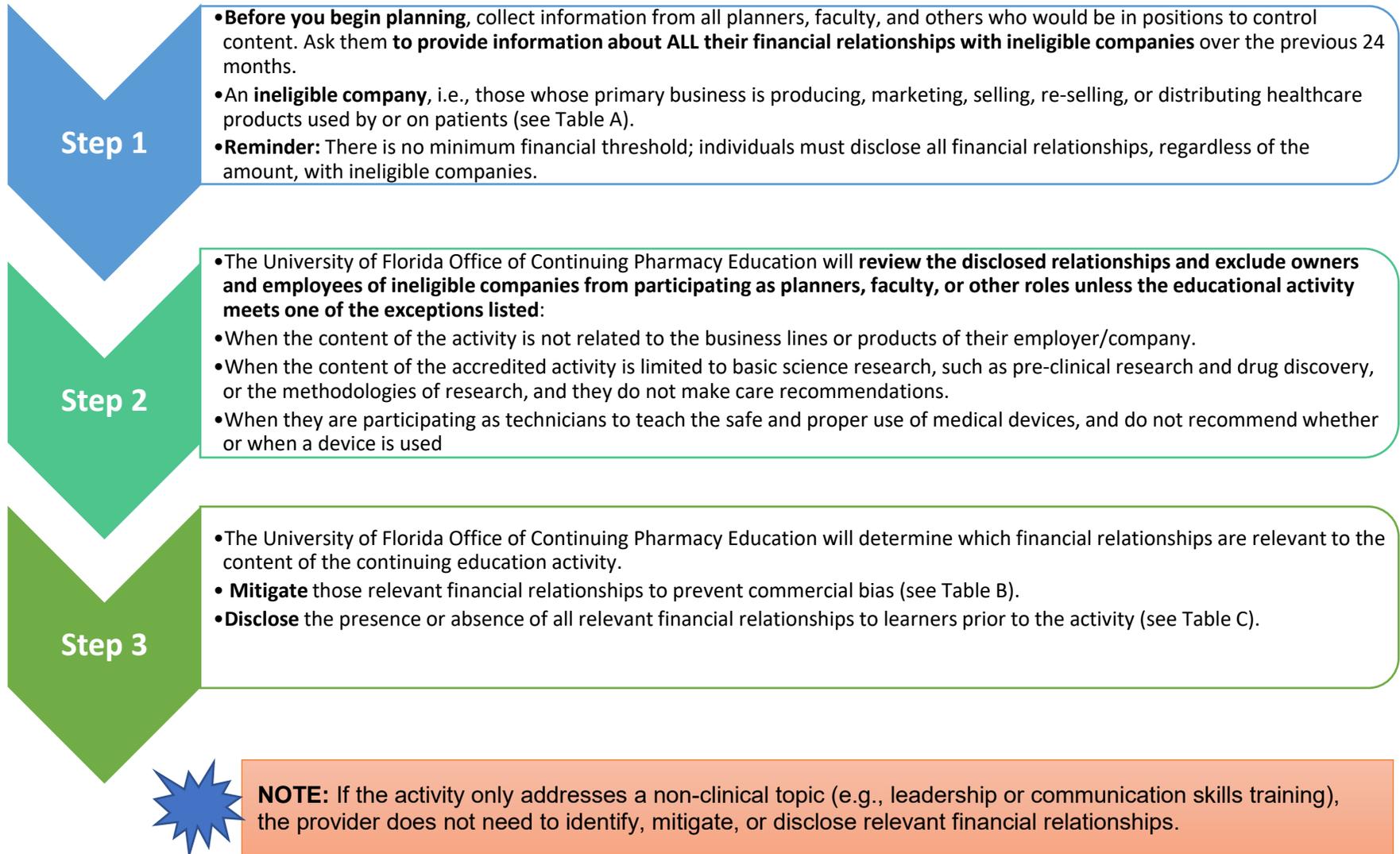
If you have questions about these expectations please contact us at cesupport@ahc.ufl.edu.

Thank you,

**The Office of Continuing Pharmacy Education
College of Pharmacy University of Florida**

Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships

Figure 1: Steps to Identify, Mitigate, Disclosure Relevant Financial Relationships



Steps for the Identification, Mitigation, and Disclosure of Relevant Financial Relationships

Figure 2: Steps to Mitigate and Disclose Relevant Financial Relationships

A. Determine **relevant financial relationships** for all who will be in control of educational content.

Financial relationships are relevant if the following three conditions are 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 existed during the past **24 months**.
- ✓ The content of education is **related to the products** of an ineligible company with whom the person has a financial relationship.

B. **Mitigate** relevant financial relationships prior to individuals assuming their roles in education.

C. Before the learner engages in the education, **disclosure to learners the presence or absence of relevant financial relationships** for all persons in control of content.

NOTE:

- ✓ **If commercial support is received**, the accredited provider must also disclose to the learners the name(s) of the ineligible company(ies) that gave the commercial support, and the nature of the support if it was in-kind, prior to the learners engaging in the education.
- ✓ **Disclosure to learners must not include** ineligible companies' corporate or product logos, trade names, or product group messages.
- ✓ It may be helpful to include definitions of terms to learners to support their understanding of your processes (e.g., ineligible companies, relevant financial relationships, etc.).

Disclosure Form for All Financial Relationships Planners, Faculty, and Others

Name of Individual: <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> Title of CE Activity: <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> Date and location of CE Activity:	Individual's prospective role in CE Activity (select all that apply) <ul style="list-style-type: none"> <input type="checkbox"/> Planner <input type="checkbox"/> Faculty, Speaker, Instructor <input type="checkbox"/> Author, Writer <input type="checkbox"/> Reviewer <input type="checkbox"/> Other _____
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Please disclose all financial relationships that you have had in the past 24 months with ineligible companies (see definition below). For each financial relationship, enter the name of the ineligible company and the nature of the financial relationship(s). There is no minimum financial threshold; please disclose ALL financial relationships, regardless of the amount, with ineligible companies. You should disclose all financial relationships regardless of the potential relevance of each relationship to the education.

The Standards for Integrity and Independence require that individuals who refuse to provide this information be disqualified from involvement in the planning and implementation of accredited continuing education. Thank you for your diligence and assistance.

Name of Ineligible Company	Nature of Financial Relationship	Has the Relationship Ended?
An ineligible company is any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.	Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options should be disclosed; diversified mutual funds do not need to be disclosed. Research funding from ineligible companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.	If the financial relationship existed during the last 24 months but has now ended, please check the box in this column. This will help determine if mitigation steps need to be taken.
Example: ABC Company	Consultant	
		<input type="checkbox"/>

In the past 24 months, I have not had any financial relationships with ineligible companies.

I attest that the above information is correct as of the date of this submission.

Signature: _____ Date: _____

Communicating Disclosures to Learners

Approved Language to Disclose Relevant Financial Relationships

The language below must be used to provide disclosure to learners. Disclosure must be provided to learners **before** engaging in the continuing education activity.

<p>If there are NO relevant Financial Relationships: <i>Inform learners that planners, faculty and others in control of content (either individually or as a group) do not have relevant financial relationships with ineligible companies.</i></p>	<p>If there ARE relevant financial relationships: <i>Disclose name(s) of the individuals, name of the ineligible company(ies) with which the individual has a relevant financial relationship(s), the nature of the relationship(s), and a statement that all relevant financial relationships have been mitigated.</i></p>
<p>Jane Doe, Pharm.D (speaker) has disclosed that she has no relevant financial disclosures. No one else in a position to control content has any financial relationships to disclose.</p>	<p>John Doe, Pharm.D (advisor) has disclosed that he is a former stockholder of Company X, Inc., a company which no longer exists and he no longer holds shares receives financial or material support from the University of XXX for being named as a co-inventor on a pending patent for a genomic prescribing system. No one else in a position to control content has any financial relationships to disclose.</p>

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