

Disclosure Form

Name of Individual: _____ Title of CE Activity: _____ Date and location of CE Activity: _____	Individual's prospective role in CE Activity (select all that apply) <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 educational activity.

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"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<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: _____

PART 2. OFF-LABEL USE

When a single product is the subject of discussion during a WSPA CPE activity, there will be a balanced discussion of the prevailing body of scientific information on the product and reasonable, alternative treatment options. There will be meaningful disclosure of any limitations on information that is presented. If the presenter discusses non-approved (unlabeled) uses, they will disclose that the product is not approved in the United States for this use.

During my presentation, I will disclose to participants when I am discussing off-label use of a product and where they are in the process of being approved for a purpose other than that for which it was approved by the Food and Drug Administration. **FDA status: A = Approved; I = Investigational; NA = Not Approved**

Device/Drug	A	I	NA	Device/Drug	A	I	NA

Not applicable.

STEP 1: Review collected information about financial relationships 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 individuals 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.

STEP 2: Determine **relevant financial relationships**.

Review the information for all individuals not excluded after STEP 1 and determine whether each individual’s financial relationships with ineligible companies are relevant to the content of the CE activity. Financial relationships are relevant if the following three conditions are met for the individual who will control content of the activity:

- ✓ A financial relationship, in **ANY AMOUNT**, exists between individual and an ineligible company.
- ✓ The financial relationship existing during the past **24 months**.
- ✓ The content of the education is **related to the products** of an ineligible company with who the individual has a financial relationship.

STEP 3: Chose a **mitigation strategy** for each individual with a relevant financial relationship and implement that strategy before the individual assumes their role.

Using the lists below, identify which mitigation strategy(ies) will be used for individuals with relevant financial relationships who control educational content for the activity. Multiple strategies may be used. The strategy used should be **appropriate to the individual’s role**.

Mitigation Steps for Planners:

- ✓ **Divest** the financial relationship(s)
- ✓ **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
- ✓ Other method: _____

Mitigation Steps for Faculty and Others:

- ✓ **Divest** the financial relationship(s)
- ✓ **Peer review** of content by individuals without relevant financial relationships
- ✓ Other method:

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

Name of Individual	Role(s) in Activity	Step(s) Taken to Mitigate Relevant Financial Relationship	Date Implemented
<i>Example: Dr. Smith</i>	<i>Planner</i>	<i>Recusal from topic/faculty selection</i>	<i>5/1/21</i>