

Is the activity clinical in nature?
Is the activity related to clinical knowledge or skills?

No

-Proceed with activity planning for contact hours ("CHs").
-No financial disclosure process required.

Yes

-Collect financial relationship data from all in control of content (planners, presenters, content developers, all other faculty). Include 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 ("CHs").
-Include narrative of assessment on activity file / RFR forms
-Disclosure to learners will include that there are no relevant financial relationships.

Yes

Were the relationships listed with an Ineligible company¹?

No

-Proceed with activity planning for CHs.
-Include narrative of assessment on activity file / RFR forms
-Disclosure to learners will include that there are no relevant financial relationships.

Yes

Owner or employee²?

Yes, owner or employee

Exclusions present³?

Yes

-Proceed with activity planning for CHs.
-Mitigate the relevant financial relationship⁴.
-Complete the NP Mitigation Worksheet.
-Disclosure will include that relevant financial relationships were mitigated.

No

-Exclude presenter / planner / other faculty from any role for the activity.
-Document on activity document
-Proceed with planning for CH. The person who was excluded may not have any role.

No; Affiliation only⁵

-Proceed with activity planning for CHs.
-Mitigate the relevant financial relationship⁶.
-Complete NP Mitigation Worksheet.
-Disclosure will include that relevant financial relationships were mitigated.

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 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

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

²: Non-employees (consultants, etc.) get a 1099 for taxes.
Employees get a W-2 for taxes.
(Owners use other documents for

^{4, 6}: Mitigation may include: not offering nursing contact hours; review of presentation; attestation. See list of mitigation strategies. Consult PNP with questions.

⁵: Refer to examples of affiliations with ineligible companies listed on the WNA Disclosure Form. These include stock ownership, consulting, advisory positions, etc.

³: Owners and employees can participate as planners or faculty if at least 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.