

ASPEN Continuing Education Program

Financial Relationship Disclosure Guidelines

We look forward to having the opportunity to include you in our accredited continuing education (CE) program.

**Why am I receiving this communication?**

ASPEN is jointly accredited by the Accreditation Council for Continuing Medical Education (ACCME), Accreditation Council for Pharmacy Education (ACPE), American Nurses Credentialing Center (ANCC) to provide continuing education for the healthcare team. Specifically, ASPEN provides accredited education to dietitians, nurses, pharmacists, and physicians under the Joint Accreditation umbrella. 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. 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. For more information on the Standards for Integrity and Independence in Accredited Continuing Education, please visit [www.accme.org/standards](http://www.accme.org/standards).

**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 provided by ASPEN to share all financial relationships you have had with **all** ineligible companies during the past **24 months**. This information is necessary for us to be able to move to the next steps in planning this continuing education activity. The ACCME Standards for Integrity and Independence require that we disqualify individuals who refuse to provide this information from involvement in the planning and implementation of accredited continuing education. If you have questions about these expectations, please contact Michelle Spangenburg at [michelles@nutritioncare.org](mailto:michelles@nutritioncare.org).

**Faculty Financial Relationship Policy**

To maintain compliance and scientific integrity of our educational programs, all persons in a position to affect or control the content of an educational activity must adhere to the following.

1. Provide ASPEN with information on all financial relationships with ineligible companies over the past 24 months. **ASPEN may not confirm your participation prior to receiving this information and mitigating any relevant financial relationships.**
2. Eliminate commercial bias. Whenever possible, classes or groups of similar products or treatment approaches should be discussed using generic names rather than trade names. Varying or conflicting viewpoints should be explored.
3. Advertising may not be a part of educational materials or venue. Promotional activities of any kind may not occur during / in the space of an educational activity. This includes faculty promoting a book they have authored for which there is a financial gain.
4. Recommendations for clinical practice will be supported by and will reference best-available evidence.
5. Scientific research used to support recommendations for clinical practice must conform to generally accepted standards of experimental design, data collection and analysis.

**Terms and Definitions**

* **Eligible organizations**: Organizations that are eligible to be accredited.
* **Ineligible companies**: Organizations that are not eligible for accreditation*.* Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.These organizations were referred to as *commercial interests* in the Standards for Commercial Support. The new term is intended to clarify that eligibility for accreditation is not based on whether an organization is for-profit or nonprofit but is based on its primary mission and function. Please note the definition as well as the term for ineligible companies has been updated from the Standards for Commercial Support. See the eligibility section.
* **Mitigate**: The term *mitigate* replaces *resolve*, in guidance related to relevant financial relationships, to clarify that accredited providers are expected to mitigate the potential effect of these relationships on accredited continuing education. The expectation hasn’t changed, only the term used to describe it.

**Disclosure Process**

Enter the information below for **all** financial relationships that you have had in the past **24 months** with ineligible companies (see definition above). There is no minimum financial threshold; **we ask that you disclose all financial relationships with ineligible companies, regardless of the amount or potential relevance to the education.**

1. **Name of Ineligible Company**

An ineligible company is any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. For specific examples of ineligible companies, visit [www.accme.org/standards](http://www.accme.org/standards).

1. **Nature of Financial Relationship**

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.

1. **Has the Relationship Ended?**

If the financial relationship existed during the last 24 months, but has now ended, please check the box in this column. This will help the education staff determine if any mitigation steps need to be taken.



**Mitigation Process**

If after review by an ASPEN designee any of my financial relationships are determined to be relevant financial relationships, the following mitigation strategies are suggested specific to my relationships. I understand that I may be asked to employ a different mitigation strategy than one I initially suggest. ASPEN staff will follow up after your disclosures have been reviewed to confirm or modify the mitigation strategy collaboratively with you.

* **Not applicable as I have nothing to disclose**
* **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
* **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)
* **Other** (please describe)