



PONL Policy on Disclosure of Relevant Financial Relationships

The Pennsylvania Organization of Nurse Leaders (PONL) is a professional membership organization comprised of nurse leaders from all organizational levels across the Commonwealth. All PONL members are registered nurses in leadership positions. Education that PONL provides or sponsors is focused solely and exclusively on topics related to nursing leadership, health care leadership and/or general leadership themes. Since PONL does not provide education on any clinically related areas, steps outlined in the PSNA document *Steps for the Identification, Mitigation and Disclosure of Relevant Financial Relationships* regarding mitigation and disclosure do not apply and the *Activity Planning Form for a Non-Clinical Activity 2022* is utilized.

In the event that PONL does offer and/or jointly provides a program clinical in nature, the *Activity Planning Form for a Clinical Activity 2022* will be used, and the following steps will be taken:

1. Before planning is initiated, all nurse planners and members of all the planning committee, faculty, and others who are in a position to control content will complete and submit the *PSNA Template for Collecting Information about All Financial Relationships*. Information about all financial relationships with ineligible companies over the previous 24 months must be disclosed. There is no minimum financial threshold; individuals must disclose all financial relationships, regardless of the amount, with ineligible companies. Ineligible companies are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.
2. The nurse planner(s) will review all relationships and **exclude owners and employees of ineligible companies from participating as a nurse planner, faculty, or other roles** unless the educational activity meets one of the three exceptions listed.

Three exceptions that allow for owners and/or employees of ineligible companies to participate as planners or faculty in approved continuing education:

- When the content of the activity is **not related** to the business lines or products of their employer/company.
- When the content of the approved 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.
- When they are participating as technicians to teach the safe and proper use of medical devices, and do not recommend whether or when a device is used.

3. The nurse planner(s) determines which financial relationships are **relevant** for all who will be in control of educational content of the continuing education activity. Financial relationships are relevant if the following three conditions are met for any 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 content of the education is related to the products of an ineligible company with whom the person has a financial relationship.
- The financial relationship existed during the past **24 months**.

4. **Mitigate** relevant financial relationships prior to individuals assuming their roles in the educational activity by using the *PSNA Worksheet for the Mitigation of Identified Relevant Financial Relationships of Nurse Planner, Content Experts, Faculty, and Others*.

5. Chose the **mitigation strategy** if a relevant financial relationship(s) exists.

Mitigation Steps for Planners (*choose at least one*)

- 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
- Use other methods – describe the method

Mitigation Steps for Faculty and Others (*choose at least one*)

- Divest the financial relationship
- 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)
- Use other methods – describe the method

6. The mitigation strategy(ies) used for each person with a relevant financial relationship will be **documented** by the nurse planner(s) noting: name of person, role(s) in activity, steps to mitigate relevant financial relationship, and date implemented.

7. Before learners engage in the education, **disclosure will be made at the educational event, both verbally and in writing**, regarding the presence or absence of relevant financial relationships for all persons in control of content.

- Learners will be informed that nurse planners, content experts, faculty, and others in control of content (either individually or as a group) **have no relevant financial relationships with ineligible companies**.

-or-

- **The name(s) of the individuals, name of the ineligible company(ies) with which they have a relevant financial relationship(s), the nature of the relationship(s), and a statement that all relevant financial relationships have been mitigated.**