



Exemplary Policies: Managing Interactions between Physicians and Industry at Academic Medical Centers*

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The best clinical conflict of interest policies at Academic Medical Centers (AMCs), arranged by policy area:

1. Gifts

These policies ban all gifts, without exception.

University of Pittsburgh

SOHS and UPMC personnel shall not accept or use personal gifts (including food) from representatives of Industry, regardless of the nature or dollar value of the gift. Although personal gifts of nominal value may not violate professional standards or anti-kickback laws, such gifts do not improve the quality of patient care, may subtly influence clinical decisions, and add unnecessary costs to the healthcare system. Gifts from Industry that incorporate a product or company logo on the gift (e.g., pens, notepads or office items such as clocks) introduce a commercial, marketing presence that is not appropriate to a non-profit educational and healthcare system... SOHS and UPMC personnel may not...accept complimentary tickets to sporting or other events or other hospitality from Industry.

West Virginia University

All gifts and meals that are directly funded or provided by industry or vendors, regardless of nature or value, are prohibited regardless of whether they are offered in Health Sciences Center-operated sites or off-site.

2. Meals

These policies eliminate industry-provided meals, with very limited exceptions.

University of Buffalo

Industry sponsored meals in any setting are prohibited.

University of Washington

It is the policy of UW Medicine that food and beverages provided by commercial entities or non-profit entities created and supported by commercial entities are not permitted at UW Medicine operated facilities (including

UWMC, HMC, the SoM, and South Lake Union) or at off-campus events held by UW Medicine, any of its component entities, or any of its faculty. In off-campus events not sponsored by UW Medicine, its component entities, or its faculty, there are certain limited circumstances in which faculty, including those responsible for the acquisition of goods and services, are allowed to accept and consume food and beverages provided by others. In general, faculty may accept food or beverages that are incidentally provided at an event that is considered part of the job duties of the faculty member. Food and beverages may be accepted and consumed at events sponsored by civic, charitable, specialty or job-related professional organizations, governmental, or community organizations. In other situations, faculty members should refrain from accepting gifts of food and beverages from commercial or non-profit entities created and supported by commercial entities.

3. Pharmaceutical representative access to physicians

This policy clearly details all of the requirements for vendor access, and mentions specific consequences for violations. Vendors require orientation, identification, appointments, and registration. They are not permitted in patient care areas.

University of Pennsylvania

Registration and Orientation: Pharmaceutical company representatives, on their first visit to HUP/CPUP will be directed to the Department of Pharmacy Services, where they will be provided with a copy of this policy. The representative will sign a statement to the effect that he/she has received and understands this policy. The representative will then be directed to the HUP Security Department to obtain the appropriate identification badge. The representative must wear this identification badge at all times during all HUP/CPUP campus visits...Pharmaceutical company representatives must provide the following information to the Department of Pharmacy Services secretary: 1) current business card; 2) immediate supervisor's name, work phone, and address. Any changes to this information must be promptly forwarded to the Department of Pharmacy Services... Pharmaceutical company representatives are required to have a scheduled appointment whenever they visit the Hospital or CPUP. Representatives who arrive in the Hospital or a CPUP location without an appointment should be asked to leave the facility and subsequently reported to the Director of Pharmacy Services. Exceptions include visits to expedite removal of recalled or return products in coordination with the Pharmacy Services Department or to deliver new product information to the Pharmacy Services Department... Pharmaceutical company representatives visiting HUP/CPUP for any business reason will report to the secretary in the Department of Pharmacy Services. Representatives also are required to register with the department in which they have a scheduled appointment...HUP/CPUP reserves the right to limit the number of pharmaceutical representatives a single company has visiting HUP/CPUP at any given time.

Authorized and Unauthorized Areas: Pharmaceutical company representatives are not permitted to detail professional staff in any patient care unit, including inpatient units, nursing stations, conference rooms, physician lounges, outpatient clinics (patient areas), perioperative and operative areas and the Emergency Department. Representatives must conduct meetings ONLY in private offices. Public areas such as the cafeteria and non-patient care areas may be used by representatives subject to the approval of the professional staff who are in charge of the area provided it is not in an inpatient area. Representatives must have a scheduled meeting. Detailing shall not be permitted in public telephone areas, hallways, inpatient care units, near elevators or in parking garages. Due to patient confidentiality concerns, pharmaceutical company representatives are not permitted to attend any conferences or reports. Representatives may not see patients, review their charts or any portion of the patient medical record, whether in electronic or paper format, go on rounds or attend surgery. Pharmaceutical representatives are prohibited from all clinical areas, including inpatient units and conference rooms on inpatient units, where there may be a potential for patient information to be shared. In those rare

circumstances where a pharmaceutical company representative has direct patient contact, they are subject to hospital policy regarding immunizations and other health requirements (e.g. MMR immunization, TB skin testing) and must also have executed a Clinical Observer Agreement.

4. Samples

These policies prohibit individuals from accepting drug samples. All samples must be accepted and distributed by a central repository.

Baylor University

Covered Personnel and Trainees must not receive or accept free pharmaceutical samples (prescription or over-the-counter) directly from Industry... Clinical College Sites may receive or accept drug samples directly from Industry. All College Sites that do so must set up a central repository to distribute the drug samples and to facilitate timely patient access to optimal therapeutics. The College Site must determine the central repository's formational and operational guidelines, which must not conflict with the guidelines of any relevant College affiliated institution.

Wake Forest University

Individual Medical Center faculty, staff, students and trainees may not accept medications and pharmaceutical samples from Industry. Further, individual faculty, staff, trainees and students at the Medical Center may not accept medications and pharmaceutical samples from Industry representatives on behalf of the Medical Center. The only exceptions to this rule are that the NCBH Pharmacy may continue to accept pharmaceutical samples, as it has previously done, for select transplant and cardiology patients and that samples will be permitted when provided for patient education (for example education in the use of inhaled drugs for pediatric asthma). Should the elimination of medication samples negatively impact the quality of patient care within an individual clinic, the section or department may request an exception to this policy. Specific criteria will be established for such exceptions, and the request will be reviewed by the Medical Center Committee. A voucher system will be established for the distribution of pharmaceuticals to meet the needs of indigent and other selected patients at the medical Center. The Outpatient Prescription Drug Subcommittee shall develop the procedures for implementation of this policy, including a list of drugs that are acceptable for free distribution to indigent patients via the voucher system.

5. Pharmacy and Therapeutics

This policy requires disclosure of financial interests and industry relationships. Conflicted individuals are prohibited from discussion and decisions regarding relevant products.

University of Southern California

USC Healthcare Professionals are obligated to disclose to the appropriate parties (e.g., Pharmacy and Therapeutics Committees, Chair/Supervisor), any past or current financial interests, management roles or consulting relationships with Industry which are relevant to the product/service under consideration. USC Healthcare Professionals must recuse themselves from any purchasing deliberations or decisions relevant to the conflicting interests that pertain to the Industry's products or services when there is an ongoing or current consulting relationship.

6. Continuing Medical Education

This policy requires funding for CME activities to comply with ACCME Standards for Commercial Support. Additionally, all industry funds are accepted and distributed via a central fund.

Temple University

Where support from an external source is intended for educational programs which will issue CME credits, this support must be organized through the TUSM Office for CME, which will manage these funds and insure that all relevant guidelines of the Food and Drug Administration and standards of the Accreditation Council for CME will be met.

University of Arkansas

Industry contributions in support of educational activity, both CE and non-CE, must be made in the form of an unrestricted educational grant to the University of Arkansas for Medical Sciences. UAMS will be the sole authority on the choice of topics, materials, presenters and attendees. All CME activities are required to comply with the ACCME Standards for Commercial Support and the COM Office of Continuing Medical Education Policy of Commercial Support of a Continuing Medical Education Activity.

7. Consulting

This policy requires written agreements and prior approval for consulting arrangements with industry. In addition, payments must correspond with the amount of work performed, and relationships and payments must be fully disclosed.

University of Iowa

All consulting arrangements with industry (including, but not limited to, scientific advisory boards, data safety monitoring boards, other advisory/scientific boards, and product evaluation/development) must be accompanied by a time-limited contract or letter of invitation/agreement that outlines specific deliverables, tasks, responsibilities, and compensation that is consistent with the expertise provided. Prior to executing a consulting contract and engaging in consulting activity, the faculty/staff member or trainee must submit the agreement to his/her DEO or manager/supervisor, as applicable, for approval of the consulting activity (faculty members who are the DEO should submit the contract to the Dean of the CCOM for approval of the activity). When the DEO or manager/supervisor has approved the activity, the contract must be submitted to the VPMA/COI Office for review and approval. Consulting agreements that involve the assignment of intellectual property rights must comply with the University of Iowa Intellectual Property Policy...Disclosure of consulting relationships must be fully transparent and documented, including the amount of financial compensation received. Employees may not accept payment, gifts, or other benefits, in return for completing evaluations or surveys developed by a business entity unless this activity meets the requirements for consulting agreements.

8. Honoraria

This policy requires prior review and approval for industry-sponsored speaking engagements. Payments are capped. Full public disclosure is also required.

Emory University

A School of Medicine faculty member who wishes to speak or provide training at a non-ACCME-accredited industry-sponsored education or training activity away from Emory must report this external personal, professional relationship in advance to the Department Chair and Dean's Office for review and approval prior to agreeing to, engaging in, or accepting remuneration for the activity...Faculty who wish organize and present a non-ACCME-accredited industry-sponsored course away from Emory also must report this activity in advance for review and approval using the online reporting system. However, individuals who propose to organize such courses should make all reasonable efforts to organize and present the course in compliance with ACCME accreditation policies.

The proposed activity for faculty who wish to be compensated speakers or trainers at industry-sponsored education and training events will be carefully reviewed because of the high potential for conflict of interest in content and participation. The ultimate decision might be contingent on whether any conflict of interest that might be created can be effectively managed.

To receive approval for speaking or training at or organizing a non-ACCME-accredited educational or training event, the following conditions [must] apply: Industry-sponsored education and training events will not occur in School of Medicine or other Emory buildings or in Emory affiliates where School of Medicine faculty, staff, students, and trainees work and study; The agreement will document that the speaker/trainer will present a balanced assessment of the research and/or therapeutic options and that the attendees and speaker will be able to engage in a critical assessment and evaluation of the topic. Course organizers will ensure the same objectivity for speakers/trainers in the course; Preferably the event will have more than one industry sponsor, and possibly an institutional co-host.

For those who propose to speak or train at such industry-sponsored educational events, the industry sponsor will have no review or control of content and will not provide material (except possibly the equipment or device) to be included in the content. The content for educational activities will not be focused on a single company and its product(s) and will provide evidence-based data and information. For those who propose to organize a course to train other physicians/scientists, the sponsor will not review or control the content, but might provide equipment centrally to the School that is designated for use in the training course, as long as full disclosure to attendees about the donation is made.

The event must be primarily educational and designed to provide evidence-based medical or scientific information and to promote evidence-based clinical care and/or to advance scientific research. The event and content of the speaker's presentation(s) is not FDA-regulated. The industry sponsor will fully disclose to attendees its financial support of the activity, and the faculty will not have financial relationships with the sponsor(s) other than the agreement to participate in the educational or training activity. School of Medicine speakers may accept reasonable travel expenses, including modestly-valued meals, as part of their compensation for speaking, but may not accept the gift of travel expenses for spouses, dependents, and domestic partners. They may accept an honorarium for speaking or training, not to exceed \$2,500 per event. The faculty member will disclose that he/she is receiving compensation for the presentation and will disclose all his/her other related financial interests, current, past, and expected. The industry sponsor will not reimburse the travel expenses of other attendees, provide meals and refreshments, or compensate them for attendance. Except in faculty titles, Emory's name, marks, resources, and buildings will not be used in connection with the event and Emory will not be an institutional host. To the extent possible, the activity and participation will concur with ACCME guidelines.

9. Travel

These policies ban industry funding of travel unrelated to outside professional activities.

University of Maryland

Faculty and students must not accept gifts of travel funds from industry merely to participate in or attend medical education conferences.

Dartmouth University

Attendees at vendor/industry sponsored training or educational programs...may not accept subsidies from the vendor/industry to pay for the costs of travel, lodging, or other personal expenses.

10. Scholarships

These policies require that all industry funds for scholarships must be centrally accepted and managed. Funds are distributed at the discretion of the school, and cannot be earmarked for a specific purpose.

University of Maryland

All scholarships or other educational funds from industry must be received by the University of Maryland Baltimore Foundation. Funds received from the Foundation are disbursed at the direction of the School. The evaluation and selection of trainees receiving scholarships or educational funds must be the sole responsibility of School faculty and must be overseen by the Chair with no involvement by the donor industry. The Chair will report allocations of funds annually to the Dean or Dean's designee.

Indiana University

Industry has long played a role in funding scholarships, fellowships, and reimbursement of travel through travel grants. In order to make certain this valued relationship occurs in an appropriately supportive manner, IUSM has adopted the following guidelines: All funds must be routed through an IU Foundation account in accordance with IUSM requirements. Evaluation and selection of specific recipients of such funds must be the sole responsibility of IUSM with no involvement by the donor Industry. Thus, and by way of example, Industry may elect to support a fellowship in a specific area of advanced training, but Industry [will] not be invited or otherwise participate in the selection of individual recipients of the fellowship. Disbursement of all such funds must be approved in advance by the IUSM Dean's Office or its designee. The recipient of the funding is not subject to any conditions dictated by the funding entity.

11. Ghostwriting

This policy prohibits ghostwriting. Furthermore, it delineates specific standards for authorship.

Georgetown University

Publishing articles or materials under an individual's own name that are written by, or in material part by, Industry Representatives is prohibited. Specifically, individuals subject to this policy shall not accept writing assistance, editorial assistance, manuscript preparation, revision, production, or submission services, slide preparation or revision; or other services from Industry (either directly or indirectly) unless such materials provided by Industry are specifically attributed to the author (i.e. each slide of a presentation must be appropriately attributed). "Guest" authorship or "ghostwriting" is not allowed. All persons who make a substantial contribution to a manuscript, presentation, or other writing meeting the ICMJE standards/criteria or other accepted scientific standards for authorship should be listed as authors and their affiliations listed (academic, Industry, other).

12. Speakers' Bureaus

This policy clearly defines specific standards for speaking engagements. Faculty members must retain full control over content. Public disclosure is also required.

Johns Hopkins University

Faculty members may speak at an industry-sponsored program only if the faculty member retains full control and authority over professional material the faculty member presents and does not allow such communications or presentations to be subject to prior approval by any commercial interest other than approval for the use of proprietary information. Activities with any of the following characteristics may not be undertaken at any location, whether on-site or off-site: a company has the contractual right to dictate what the faculty member says; a company (not the faculty member) creates the slide set (or other presentation materials) and has the final approval of all content and edits; the faculty member receives compensation from the company and acts as the company's employee or spokesperson for the purposes of dissemination of company-generated presentation materials or promotion of company products; and/or a company controls the publicity related to the event. Some of the prohibited activities occur in the context of "speakers' bureaus," but the conditions of the speaking engagement must govern the decision as to whether or not the activity is acceptable under this policy. Exceptions to this policy may be granted by the School of Medicine Office of Policy Coordination to allow faculty participation in training of providers for a new device or procedure under applicable regulations (e.g., FDA-mandated training). At any presentation for which the faculty member has received industry payment or support, the faculty member must fully disclose the name of the company and the nature of the support.