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Implementing the Recommendations of the AAMC Task Force on Industry Funding of Medical Education: A Selected Policy Language Compendium

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A Selected Policy Language Compendium

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Preface

In 2006, the Association of American Medical Colleges convened The Task Force on Industry Funding of Medical Education. Task Force members were charged with examining the benefits and pitfalls associated with industry funding of medical education, and developing principles to guide academic medical institutions in reframing their relationships with industry. The Task Force Report on Industry Funding of Medical Education¹ is the product of the Task Force's work and provides recommendations to address 11 common interactions with industry, including gifts to individuals, pharmaceutical samples, site access by pharmaceutical representatives, site access by device manufacturer representatives, continuing medical education, participation in industry-sponsored programs, industry-sponsored scholarships and other educational funds for trainees, food, professional travel, ghostwriting, and purchasing.

On June 19, 2008, the Association of American Medical Colleges' Executive Council "accepted and fully endorsed the report of the Task Force on Industry Funding of Medical Education and urged member institutions to implement the report recommendations within twelve months."

This compendium of excerpts from various institutions' policies has been assembled to serve as a resource to those charged with developing and/or refining local academic medical center policies regarding industry funding of medical education and interactions with industry representatives. The compendium allows for easy comparison of adopted policy provisions across selected institutions that have developed comprehensive policies in this area within the past three years. The excerpted provisions may provide helpful bases for comparison of approaches to particular types of interactions with industry and serve as a basis for an institution's individual policies.

The compendium does not include policies from all AAMC member institutions. Instead, it contains language from fifteen policies that we selected because they address a majority of the interactions that were the subject of the Task Force recommendations: (1) gifts to individuals, (2) pharmaceutical samples, (3) site access by pharmaceutical and device manufacturer representatives, (4) continuing medical education, (5) participation in industry-sponsored programs, speakers bureaus, and consulting, (6) industry-sponsored scholarships and other educational funds for trainees, (7) food, (8) professional travel, (9) ghostwriting, and (10) purchasing.

The policies included are not evaluated against the Task Force recommendations or against each other. They simply provide a series of examples of how 15 different institutions address the topics in the Task Force recommendations. Language from policies has been excerpted by topic, but because policies are not organized identically, some language may appear under more than one topic heading. For example, many institutions' policies cover a variety of subtopics under the general heading of gifts (e.g., meals, compensation, attendance at sales presentations, etc.). This document provides coverage of each institution's gifts section under the heading of "Gifts to Individuals". Language addressing the subtopics may also appear under other topic headings, such as "Food". Internal references within specific policies have been included to permit further review of policy provisions. Institutions are listed in alphabetical order within each topic heading.

¹ Association of American Medical Colleges. *Industry Funding of Medical Education: Report of an AAMC Task Force*. June 2008.

List of Included Institutions

- Boston University School of Medicine
- Mount Sinai School of Medicine
- Stanford University School of Medicine
- University of California, Davis School of Medicine
- University of California, Los Angeles David Geffen School of Medicine
- University of California, San Francisco School of Medicine
- University of Cincinnati College of Medicine
- University of Louisville School of Medicine
- University of Massachusetts School of Medicine
- University of Michigan Medical School
- University of Pennsylvania School of Medicine
- University of Pittsburgh School of Medicine
- University of Toledo College of Medicine
- Vanderbilt University School of Medicine
- Yale University School of Medicine

AAMC Task Force Recommendations²

Chapter 1. Professionalism and Medical Education

Institutional Policies and Practices

Recommendations:

- Academic medical centers should adopt and implement policies that address specific interactions between academic medical personnel and industry and are consistent with recommendations listed in Chapter 2. These policies should reinforce and uphold institutional and individual efforts to promote a learning environment that supports professionalism and eliminates activities that undermine this objective.
- Academic medical centers should make clear to their faculty, students, and staff that to the extent certain interactions with industry are prohibited within academic medical centers, they are also prohibited off-site.

Chapter 2. Benefits and Pitfalls

A. Gifts to Individuals

Recommendation:

- Academic medical centers should establish and implement policies that prohibit the acceptance of any gifts from industry by physicians and other faculty, staff, students, and trainees of academic medical centers, whether on-site or off-site. Such standards should encompass gifts from equipment and service providers as well as pharmaceutical and device providers.

B. Pharmaceutical Samples

Recommendations:

- The distribution of medications in academic medical centers, including samples (if permitted), should be centrally managed in a manner that ensures timely patient access to optimal therapeutics throughout the health care system.
- If central management is not thought to be feasible, or would interfere with patient access to optimal therapeutics, the academic medical center should carefully consider whether or not there are alternative ways to manage pharmaceutical sample distribution that do not carry the risks to professionalism with which current practices are associated.

C. Site Access by Pharmaceutical Representatives

Recommendations:

- To protect patients, patient care areas, and work schedules, access by pharmaceutical representatives to individual physicians should be restricted to nonpatient care areas and nonpublic areas and should take place only by appointment or invitation of the physician.
- Involvement of students and trainees in such individual meetings should occur only for educational purposes and only under the supervision of a faculty member.
- Academic medical centers should develop mechanisms whereby industry representatives who wish to provide educational information on their products may do so by invitation in faculty-supervised structured group settings that provide the opportunity for interaction and critical evaluation. Highly

² Excerpted from *Industry Funding of Medical Education: Report of an AAMC Task Force*. Only the recommendations for particular industry interactions are included here; recommendations for follow-on projects are not.

trained industry representatives with M.D., Ph.D., or Pharm.D. degrees would be best suited for transmitting such scientific information in these settings.

D. Site Access by Device Manufacturer Representatives

Recommendations:

- Access by device manufacturer representatives to patient care areas should be permitted by academic medical centers only when the representatives are appropriately credentialed by the center and should take place only by appointment or invitation of the physician.
- Representatives should not be allowed to be present during any patient care interaction unless there has been prior disclosure to and consent by the patient, and then only to provide in-service training or assistance on devices and equipment.
- Student interaction with representatives should occur only for educational purposes under faculty supervision.

E. Continuing Medical Education

Recommendations:

- Academic medical centers offering CME programs should develop audit mechanisms to assure compliance with ACCME standards, including those with respect to content validation and meals.
- Academic medical centers should establish a central CME office through which all requests for industry support and receipt of funds for CME activity are coordinated and overseen.
- To the extent that educational programs for physicians are supported by any commercial entity, including pharmaceutical, device, equipment, and service entities, the programs should be offered only by ACCME-accredited providers according to ACCME standards.

F. Participation in Industry-Sponsored Programs

Recommendations:

- With the exception of settings in which academic investigators are presenting results of their industry-sponsored studies to peers and there is opportunity for critical exchange, academic medical centers should strongly discourage participation by their faculty in industry-sponsored speakers bureaus.
- To the extent that academic medical centers choose to allow participation of their faculty and staff in industry-sponsored, FDA-regulated programs, they should develop standards that define appropriate and acceptable involvement.
 1. Academic medical centers should require full transparency and disclosure by their personnel to the centers and when participating in such programs; and
 2. Academic medical centers should require that payments to academic personnel be only at fair market value.
- Academic medical centers should prohibit their faculty, students, and trainees from:
 1. Attending non-ACCME-accredited industry events billed as continuing medical education;
 2. Accepting payment for attendance at industry-sponsored meetings; and
 3. Accepting personal gifts from industry at such events.

G. Industry-Sponsored Scholarships and Other Educational Funds for Trainees

Recommendations:

- Academic medical centers should establish and implement policies requiring that:
 1. All scholarships or other educational funds from industry must be given centrally to the administration of the academic medical center;
 2. No quid pro quo be involved in any way; and

3. The evaluation and selection of recipients of such funds must be the sole responsibility of the academic medical center or of a nonprofit-granting entity, with no involvement by the donor industry.

H. Food

Recommendations:

- With the exception of food provided in connection with ACCME-accredited programming and in compliance with ACCME guidelines, institutions should establish and implement policies that industry-supplied food and meals are considered personal gifts and will not be permitted or accepted within academic medical centers.
- Policies should make clear that the same standard of behavior should be met off-site.

I. Professional Travel

Recommendation:

- Academic medical centers should prohibit their physicians, trainees, and students from directly accepting travel funds from industry, other than for legitimate reimbursement or contractual services as described above.

J. Ghostwriting

Recommendation:

- Academic medical centers should prohibit physicians, trainees, and students from allowing their professional presentations of any kind, oral or written, to be ghostwritten by any party, industry or otherwise.

K. Purchasing

Recommendations:

- Academic medical centers should establish and implement policies that require any personnel who has a financial interest (as defined by the medical center's conflict of interest policy or applicable purchasing conflict of interest policy) in any particular manufacturer of pharmaceuticals, devices, or equipment, or any provider of services, to disclose such interests according to institutional policies and to recuse themselves from involvement in purchasing decisions relevant to the conflicting interests.
- To the extent an individual's expertise is necessary in evaluating any product, that individual's financial ties to any manufacturer of that or any related product must be disclosed to those charged with the responsibility for making the decision.

A Selected Policy Language Compendium

A. Gifts to Individuals

Boston University School of Medicine

“Clinicians may not accept any form of personal gift from industry or its representatives.”

“Clinicians may not receive any form of compensation for changing a patient’s prescription or using a specific device in a patient.”

Mount Sinai School of Medicine

“A gift is defined as anything of value that is given by a business or individual that does or seeks to do business with Mount Sinai to either the recipient or his/her close family members, and for which the recipient neither paid nor provided services.

Gifts from vendors are strictly prohibited regardless of value, including but not limited to:

1. Cash in any amount
2. Any product or service, or discounts on products or services
3. Prizes
4. Gift certificates
5. Tickets
6. Loans
7. Meals
8. Transportation
9. Hotel accommodations
10. Use of a company's vehicles or vacation facilities
11. Stocks or other securities, or participation in stock offerings
12. De minimis gifts, e.g. trade show trinkets distributed to large numbers of people by vendor representatives. Excluded from this prohibition are materials of modest cost which have a clear educational value, such as patient-friendly booklets describing organ systems.
13. Group gifts from vendors meant to be shared by all members of the staff, e.g. flowers, chocolates, etc.
14. Vendor invitations to be their guests at charitable events sponsored by Mount Sinai, e.g., the Crystal Ball, to which the vendor has purchased tickets.”

Personal Incentives:

“Occasionally, vendors offer an incentive if a buyer agrees to purchase the company's goods or services. Personal incentives, e.g., merchandise, tickets to special events, vacation trips, etc. are considered gifts as described in [Section II](#) of this policy and cannot be accepted under any circumstances.”

Stanford University School of Medicine

1. “Personal gifts from industry may not be accepted anywhere at the Stanford School of Medicine, Stanford Hospital and Clinics, the Lucile Packard Children’s Hospital, the Menlo Clinic or off site clinical facilities such as other hospitals at which Stanford faculty practice, outreach clinics and the like.
 - a. It is strongly advised that no form of personal gift from industry be accepted under any circumstances. Individuals should be aware of other applicable policies, such as the AMA

- Statement on Gifts to Physicians from Industry (<http://www.ama-assn.org/ama/pub/category/4001.html>) and the Accrediting Council for Continuing Medical Education Standards for Commercial Support (<http://www.accme.org/>).
2. Individuals may not accept gifts or compensation for listening to a sales talk by an industry representative.
 3. Individuals may not accept gifts or compensation for prescribing or changing a patient's prescription.
 4. Individuals must consciously and actively divorce clinical care decisions from any perceived or actual benefits expected from any company. It is unacceptable for patient care decisions to be influenced by the possibility of personal financial gain.”

University of California, Davis School of Medicine

1. “Gifts³ from vendors to an individual are prohibited.
2. In circumstances where the gifts are in part supporting the mission of the University (e.g., food for conferences, payment for educational travel, and samples for evaluation), there are appropriate alternatives that can enable the vendors to continue to support the University's mission. Such gifts will be processed by Health Sciences Advancement. For example, to replace the free food or payment for educational travel, vendors may donate funds to a unit of the University (e.g., department or division) to support meetings. ... Donations or gifts will not have an effect on a vendor's ability to communicate with University employees or trainees.
3. Free samples, supplies, or equipment designated for an individual are considered a gift and are prohibited.”

University of California, Los Angeles David Geffen School of Medicine

1. “Gifts are defined as items of any value received by a member of the faculty, staff, or student body for which the recipient has not provided adequate consideration in return. Examples of gifts under these guidelines would include pens, notepads, textbooks, meals, and payment for attending a meeting. This definition is somewhat broader than that contained in the State Fair

³ “Gift to an individual: payment to an individual or provision to an individual of free or discounted items, medical samples for personal use, food, or travel when the individual is not providing a service of similar or greater value to the vendor. For example: pens, notepads, free textbooks, free meals, payment for attending a meeting, and samples are all considered gifts. Honoraria for a specific service rendered (e.g., speaker's fees) are not considered gifts.

1. A gift to the University is considered a gift to the individual under any of the following circumstances:
 - a. The gift is conveyed by the vendor directly to the individual.
 - b. The vendor selected or participated in selecting the ultimate recipient of the gift.
2. Exclusions from the definition of a gift:
 - a. Items provided for a discount or free as part of a University contract;
 - b. Prizes or awards from bona fide competitions (e.g., a competitive grant);
 - c. A gift from an individual's spouse, child, parent, grandparent, grandchild, brother, sister, parent-in-law, brother-in-law, sister-in-law, nephew, niece, aunt, uncle or first cousin or the spouse of any such person, unless the donor is acting as an agent or intermediary for a vendor;
 - d. Free admission, and refreshments and similar no-cash nominal benefits provided to an individual during the entire event at which the individual gives a speech, participates in a panel or seminar, or provides a similar service;
 - e. Free admission, and refreshments and similar non-cash nominal benefits provided to an individual during a training session provided by the vendor for the purpose of training the individual in the use of the vendor's product. Note that free travel or lodging would be a gift. If free training is anticipated, it shall be referenced in the purchase contract for the vendor's product;
 - f. A rebate or discount that is made in the regular course of business to members of the public without regard to their status as a health care worker (e.g., a coupon in the newspaper for a discount on a pain reliever).”

Political Practices Act (FPPA), which governs University of California employees and aims to remove bias from their decisions. These guidelines supplement the provisions of the FPPA and University Business and Finance Bulletin G-39 (Conflict of Interest Policy) in order to reduce the potential influence of vendors on the decisions made by faculty, staff, and trainees in the School of Medicine. Honoraria and associated travel for a specific service rendered (e.g., speaker's fee) are not considered gifts because these are payments for a service. Competitive grants also are not considered gifts. Informational materials that have been produced under Accreditation Council for Continuing Medical Education (ACCME) guidelines or published under a peer review process are not considered gifts. UCLA faculty, staff, and students should be familiar with the University's Conflict of Interest Policy (<http://www.ucop.edu/ogc/coi/text.html>) and University general gift guidelines (<http://www.ucop.edu/ogc/coi/appendd.html>).

2. Gifts from industry should not be accepted anywhere on the UCLA campus or at any clinical facility operated by the UCLA Medical Enterprise. In addition, UCLA faculty, staff, and trainees should not accept gifts at any non-UCLA-operated clinical facilities such as other hospitals or clinics. The School of Medicine strongly encourages faculty and non-faculty medical staff at any affiliated program never to accept any personal gift from industry at any location under any circumstances.
3. Individuals must continually strive to avoid the appearance that clinical care decisions are influenced by outside commercial interests, or by benefits expected or received from any company. All offices and clinical care areas (i.e., rooms in an outpatient clinic, patient waiting areas, or hospital space) should be free of any materials that bear the name of a particular product or company (e.g., pens, papers, notepads, etc.). Individuals may not accept gifts, gratuities, meals, or compensation for listening to a sales talk by an industry representative, for prescribing or changing a patient's prescription, or for attending a CME or non-CME activity (unless the individual is a speaker or is otherwise actively participating or presenting at the event)."

University of California, San Francisco School of Medicine

"Personal gifts from an industry representative may not be accepted by any faculty, student or staff at any School of Medicine site, as part of any work-related activity or during any clinical or other educational rotation."

"No gifts or compensation may be accepted in exchange for listening to a sales talk or similar presentation by a representative of a commercial interest that produces or distributes health care goods and services.

Faculty, students and staff are strongly discouraged from accepting gifts of any kind from industry as part of non-professional activities. Individuals should be aware of and comply with applicable policies, such as the AMA Statement on Gifts to Physicians from Industry (<http://www.ama-assn.org/ama/pub/category/4001.html>) and the Accreditation Council for Continuing Medical Education Standards for Commercial Support (<http://www.accme.org>)."

"No gifts may be accepted in exchange for modifying patient care, such as prescribing a specific medication. Support for research and educational programs must be provided without influence on clinical decision-making."

University of Cincinnati College of Medicine

“It is expected that no form of Gift or Compensation⁴ from Industry will be accepted by Personnel of the University of Cincinnati College of Medicine under any circumstances, except as reasonable compensation for *bona fide* services. Individuals must consciously and actively divorce clinical care decisions from any perceived or actual benefits expected from Industry. It is unacceptable and unlawful for patient care decisions to be influenced by the possibility of personal financial gain.

Examples of circumstances involving Gifts and Compensation that are unacceptable under this Policy include, but are not limited to, the following: Individuals may not accept Gifts or Compensation

1. for prescribing or for changing a patient's prescription to a specific medication.
2. for recommending or utilizing a specific diagnostic or therapeutic device.
3. for listening to a sales talk by an Industry representative.
4. while attending a CME or other activity or conference (that is, if the individual is not providing *bona fide* services at the event).
5. provision of scholarships and other educational funds directly to students and trainees.”

University of Louisville School of Medicine

“Vendors may not make any form of gifts (whether cash or an item of *any value*) at *UofL Health Care*, the School of Medicine, and all other clinical, administrative, educational, and research venues and activities.”

University of Massachusetts School of Medicine

“Clinical Personnel are prohibited from accepting gifts⁵ of any kind from any Clinical Vendor.”

University of Michigan Medical School

1. “No personal gifts of any kind from vendors to faculty or staff are permitted.
2. Textbooks and items of educational value may be provided to the institution if approved by the department chair/director and if consistent with UMHS and Medical School policies. Vendor representatives may not give to individuals or the institution any promotional gifts (such as pens, pads, etc.) featuring product names. All gifts to the institution must be consistent with UMHS and Medical School policies concerning conflicts of interest which are modeled after the AMA Ethical Opinion on Gifts to Physicians, including the following:
 - a. ‘Receiving Small Institutional Gifts from Commercial Companies’ (6/3/93) – differentiates between grants/contracts to be processed through UM’s research office (DRDA) and gifts to be received directly by individual units, explains acceptable gift purposes, and outline procedures for receiving and handling funds.
 - b. ‘Commercial Support for Continuing Medical Education’ (6/3/93) – endorses the Standards of Commercial Support of the Accreditation Council for CME, which address institutional responsibility, handling of funds, reasonableness of payments, disclosure, and other issues.”

⁴ “‘Gifts’ or ‘Compensation’ refers to anything of value provided by or on behalf of Industry, including but not limited to food, beverages, pharmaceutical or device samples, or travel related expenses. ‘Gifts’ and ‘Compensation’ shall not include pharmaceutical samples which are provided in keeping with a written Departmental Policy which ensure the absence of inappropriate influence by Industry in connection with such distribution.

⁵ “‘Gifts’ are defined as anything of value – regardless of amount or value – and includes, but is not limited to pens, pads, stethoscopes, journals, textbooks, meals or other hospitality provided at any time or location (including individual or group meals and meals at local restaurants sponsored by Clinical Vendors) and tickets to sporting or other events.”

University of Pennsylvania School of Medicine

“Professionals should not accept gifts, hospitality, services, or subsidies from Industry including but not limited to those for sporting events, entertainment, or any other function not directly related to patient care. Professionals’ spouses or other guests may not have their meals or other expenses paid for by Industry. Educational resources to which all HUP/CPUP Professionals have access (for example, UpToDate online at HUP/CPUP) and unrestricted support for Continuing Medical Education (‘CME’) are preferred.”

University of Pittsburgh School of Medicine

“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.*”

“SOHS and UPMC personnel may not accept meals or other hospitality funded by Industry, whether on-campus or off-campus, or accept complimentary tickets to sporting or other events or other hospitality from Industry. Modest meals provided incidental to attendance at an off-campus event that complies with the provisions of subsection 6, below, may be accepted.

Industry wishing to make charitable contributions to the SOHS or UPMC may contact the Medical and Health Sciences Foundation or other charitable foundations legally organized to support UPMC hospitals or other UPMC entities. Such contributions shall be subject to any applicable policies maintained by UPMC, SOHS, and the receiving organizations.”

University of Toledo College of Medicine

“Gifts to UT students, residents, attending physicians, nurses and others by pharmaceutical and medical device representatives and other vendors will be prohibited throughout the University of Toledo Medical Center and on the Health Science Campus.”

Vanderbilt University School of Medicine

1. “VUMC personnel shall not accept or use personal gifts from industry representatives, regardless of the nature or value of the gift.
2. VUMC personnel may not accept gifts or compensation for listening to a sales talk by an industry representative or for prescribing medications or changing a patient’s prescription.”

Yale University School of Medicine

“YMG physicians may not accept any form of personal gift from industry or its representatives. (Although the acceptance of a gift of nominal value is unlikely to violate the anti-kickback law, acceptance of most types of gifts of more than nominal value is suspect and may carry serious legal consequences. Accordingly, this provision has been highlighted, and the policy adopted that YMG physicians should not accept any form of personal gift from industry.)”

“YMG physicians may not accept compensation for listening to a sales pitch (e.g., detailing) by an industry representative;....”

“YMG physicians must consciously and actively divorce clinical care decisions (including referrals, and diagnostic or therapeutic management) from any perceived or actual benefits accrued or expected from any company (including but not limited to personal gifts, research funding, scholarships for Continuing Medical Education attendance, consulting agreements, and the like);....”

“YMG physicians may not receive any form of compensation for changing a patient’s prescription;....”

B. Pharmaceutical Samples

Boston University Medical School

1. “Clinicians may accept free drug samples from industry for distribution to patients. Although distribution of free samples to patients is not prohibited, **all** distribution of free samples to patients must be administered by the BMC pharmacy.
2. Free drug samples may never be sold.
3. Free drug samples may not be used by clinicians for themselves, clinical staff, or family members.”

Mount Sinai School of Medicine

“Physicians and staff may not accept pharmaceutical samples for their own personal use or for distribution to patients or family members. Distributing sample drugs would place physicians in a drug dispensing role, subject to applicable laws and regulations.

There will be only two circumstances that warrant an exception to this prohibition:

1. If there is a compelling medical necessity to treat an urgent condition, where immediate treatment prior to leaving the physician's office will alter the clinical outcome
2. If there is a need to demonstrate appropriate use of a product

In these exceptional cases, the minimum possible sample should be given. Appropriate documentation of the medication dispensed or the device utilized must be entered in the patient's medical record.”

University of California, Davis School of Medicine

“Free samples, supplies, or equipment designated for an individual are considered a gift and are prohibited. Vendors may donate their product for evaluation or educational purposes to a unit of the University if the administrative head of the unit approves the donation. Sample donations are restricted to the amount necessary for evaluation or education, and are not intended to stock the university for patient care purposes on an ongoing basis. These donations are subject to the policies of the University, including those addressing drugs, devices and investigational items.

In addition to the limited sampling described above, the university may dispense sample supplies to patients when the supplies are either packaged or purchased by the University.”

University of California, Los Angeles David Geffen School of Medicine

“UCLA faculty, staff, and trainees should utilize pharmaceutical or device samples (i.e., glucose meters) only within policies established by the Medical Enterprise (i.e., logging in of samples), and when these samples clearly enhance patient care. Samples should not be used simply as a convenience or because of the encouragement of industry representatives. Samples should not be solicited or obtained by faculty, staff or trainees for personal use or for use by family members.”

University of California, San Francisco School of Medicine

“Free samples, supplies or equipment designated for an individual are considered a gift and are prohibited. Vendors may donate products for evaluation or educational purposes to a department or division, if the University invites the donation and there is a formal evaluation process. Sample donations are restricted to the amount necessary to complete the evaluation. Items may be provided to the University or Medical Center at a discount or free as part of a formal contract and, under these conditions are not considered a gift. Other policies related to the management of samples must comply

with the specific policies and procedures of each Medical Center. Faculty must abide by the policies developed at the clinical sites in which they practice.”

University of Louisville School of Medicine

“This policy does allow for pharmaceutical samples to be given to UofL Health Care clinical sites. Acceptable sample medications will be articulated in a formulary in each department as approved by each in consultation with UofL Pharmacy Services. Delivery of sample medications may not be accompanied by any form of detailing or gifting. UofL Health Care is dedicated to soon implementing a voucher plan with area pharmacies to mitigate the need for sample medications.”

University of Massachusetts School of Medicine

“Drug samples may be accepted from Clinical Vendors under the following conditions:

1. Drug samples must be received by and placed under the administration of the Pharmacy Department.
2. Drug samples may not be accepted in any area of the Medical Center or by any Clinical Personnel without specific approval from the Pharmacy Department.
3. The Pharmacy and Therapeutics Committee must approve those sample drugs to be accepted as part of the samples formulary. Drug samples not approved by the Pharmacy and Therapeutics Committee must not be accepted.
4. The Pharmacy Department must approve any location where drug samples will be stored and is responsible for monitoring appropriate administration of drug samples.
5. The UMMMC Policy on Drug Samples should be referenced and complied with in all respects.
6. The above requirements apply only to the three campuses of the Medical Center and specifically do not apply to other entities, individuals or locations, including: UMMMG - Community Medical Group office locations operating outside of the three UMMMC campuses noted above, Barre, Tri-River or Plumley Village Health Centers or to private members of the Medical Staff, unless they fall within the definition of Clinical Personnel.”

University of Michigan Medical School

1. “Sample medications are not permitted in UMHHC facilities except as noted below. This includes both patient care and non-patient care areas.
2. Vouchers approved by the University of Michigan Health System’s Ambulatory Formulary Committee may be distributed by Pharmacy Services to UMHHC ambulatory care sites in order for patients to receive complimentary starter medications from a pharmacy of their choice. The Ambulatory Formulary Committee will determine a formulary of UMHS-preferred medications, which then may be available through vouchers. Only vouchers approved by the Ambulatory Formulary Committee are permitted to be used by UM clinicians at UMHHC.
3. Non-approved vouchers may not be distributed by PSRs to UMHHC ambulatory care sites, nor dispensed by UMHHC personnel at UMHHC sites.
4. Under special circumstances in which there is a legitimate clinical need, with the approval noted below, sample medications may be permitted in UMHHC. Specific requests to have physical samples in a UMHHC clinic must be made on the Special Cause Sample Request Form (Exhibit A), and be approved by the Ambulatory Formulary Committee and the Site Medical Director.”⁶

⁶ Excerpted from UMHHC Policy 07-01-045, “Drug Samples in UMHHC”.

University of Pennsylvania School of Medicine

“HUP/CPUP Professionals may not accept medication samples from Industry representatives. See HUP/CPUP policy #1-09-07 ‘Sample Medication Voucher Program in the Clinical Practices of the University of Pennsylvania.’”⁷

University of Toledo College of Medicine

“Provision and use of drug samples will continue to be governed by the University Medical Center Policy Ambulatory Policy VI. 6-03 *Guidelines for Receiving, Dispensing, and Disposal of Drug Samples.*” [That policy allows for individual physician receipt of samples from industry representatives.]

Yale University School of Medicine

1. “YMG physicians may accept free drug samples from industry for distribution to patients;
2. Since distribution of Non-Formulary Drugs to patients may encourage use of costlier medications, YMG physicians should be cautious in distributing medications that are not on Formulary;
3. **Free drug samples may never be sold;** and
4. Free drug samples should not be used by YMG physicians for themselves or family members.”

⁷ “No medication samples are allowed within HUP and CPUP practices. The distribution of sample medication vouchers in inpatient areas is prohibited. Personnel discovering sample medication vouchers in inpatient care areas must forward them to the Department of Pharmacy Services.” Language excerpted from the University of Pennsylvania’s School of Medicine Policy 1-12-41, “Pharmaceutical Company Representative Activity”.

C. Site Access by Pharmaceutical and Device Manufacturer Representatives

Boston University School of Medicine

Vendor/Student Interactions:

“As a general rule, industry representatives may not interact with trainees at BMC or on the BUSM campus. Interactions are allowed in limited circumstances, however, when the expertise of representatives is required for instruction in the use of a device and a faculty member is present to supervise the interaction.”

Access:

“Industry representatives are not allowed in in-patient or out-patient care areas and must visit with clinicians by appointment only. Under limited circumstances, device industry representatives may be allowed in patient care areas at the request of a clinician to facilitate a clinical procedure involving a pertinent device. Under these circumstances, representatives must comply with all BMC patient care requirements and wear appropriate clothing and identification that distinguishes them from employed staff.”

Mount Sinai School of Medicine

“Vendor representatives from pharmaceutical, biotechnology and other industries may visit healthcare providers or researchers to talk about and demonstrate their new products. While generally acceptable as straightforward sales visits, an appointment is always required; representatives are not permitted on campus on a drop-in basis. Visits to health care providers must comply with Mount Sinai's policy on Medical Sales Representatives. Sales representatives are not permitted in patient care areas and may not access any patient-specific information. Refreshments and gifts from vendors, however modest, are prohibited during visits by representatives as described in [Section II](#) and [Section III](#) [“Gifts” and “Vendor Support for Medical Center Educational Events,” respectively] of this policy.

Scheduled appointments are required for vendor visits to train physicians, researchers or others in device use or new technologies.”

Stanford University School of Medicine

1. “Sales and marketing representatives are not permitted in any patient care areas except to provide in-service training on devices and other equipment and then only by appointment. (Note: Vendor policies are already in place in the hospitals and will need to be made consonant with this policy.)
2. Sales and marketing representatives are permitted in non-patient care areas by appointment only. Appointments will normally be made for such purposes as:
 - a. In-service training of Stanford Hospital and Clinic or Lucile Packard Children’s Hospital personnel for research or clinical equipment or devices already purchased.
 - b. Evaluation of new purchases of equipment, devices, or related items.
3. Appointments to obtain information about new drugs in the formulary will normally be issued by the hospital pharmacy or by Pharmaceutical and Therapeutics Committees.
4. Appointments may be made on a per visit basis or as a standing appointment for a specified period of time, at the discretion of the faculty member, his or her division or department, or designated hospital personnel issuing the invitation and with the approval of appropriate hospital management.”

University of California, Davis School of Medicine

Interaction between Vendors and University Personnel:

“Unsolicited on-site visits made by vendors are not permitted. Vendors may make on-site sales calls only at the invitation of appropriate University personnel or after an appointment has been made. Such on-site sales calls may only occur in non-patient-care areas. Exceptions can occur by local policy when it is determined that there is a compelling need for the visit or on-site sales call to occur in a patient care area. For on-site sales calls in a patient care area, patient privacy laws (including HIPAA) will be followed. The vendor may not access patient information during an on-site sales call unless the patient has given written authorization to do so.

Vendors may also enter patient care areas when:

1. Participating in health care activities (see examples below)⁸; or
2. Servicing equipment, including installation and removal; or
3. Invited for specific vendor service at the request of a representative of the University for its health care operations; or
4. Acting as a member of the general public (e.g., as a patient).”

Confidentiality:

“Unless acting as a member of the general public, the vendor will agree to a confidentiality agreement to protect the health information of our patients. The following are acceptable in lieu of a confidentiality agreement:

1. A HIPAA business associate agreement,
2. A determination that the vendor is acting as a member of a covered entity (as defined by HIPAA), or
3. Provision to ensure that the vendor does not have access to protected health information.”

University of California, Los Angeles David Geffen School of Medicine

1. “Sales and marketing representatives are not permitted in any clinical areas except to provide in-service training on devices and other equipment already purchased, or to provide demonstrations that may be of benefit to patients and where no purchase is required. Under those circumstances, representatives are allowed only by appointment.
2. Sales and marketing representatives are permitted in non-clinical areas by appointment only. Appointments will normally be made for such purposes as:
 - a. In-service training of personnel for research or clinical equipment or devices already purchased;
 - b. Evaluation of new purchases of equipment, devices, or consideration of addition of new pharmaceuticals to the hospital medication formulary.
3. While appointments may be made at the discretion of any faculty member, the overall activity of sales and marketing representatives is subject to the oversight of division chiefs, department chairs, medical staff leadership, and other designated officials of the SOM and the Medical Enterprise.”

University of California, San Francisco School of Medicine

“Faculty and staff at each UCSF site must abide by the policies and procedures for each institution (UCSF and UCSF Medical Center, SFGH and VA Medical Centers) with regard to meeting with

⁸ Examples are not included here.

industry representatives. In general representatives are permitted in non-patient care areas *by appointment only*. Company representatives are not permitted in any patient care areas except to provide scheduled and approved in-service training on devices and other equipment for which there is an executed University contract for these services.”

University of Cincinnati College of Medicine

Site Access by Industry Representatives:

“Industry representatives other than service personnel are not permitted on the premises of the College of Medicine except for specific appointments with faculty or authorized staff members. Presence at other times must be approved. Approvals may be granted on a per visit basis or as a standing appointment for a specified period of time at the discretion of the faculty member, his or her division or department.”

Affiliated Training Sites’ Policies:

“Policies established by affiliated training sites which regulate access of Industry to such sites shall be honored to the extent that such policies may impose additional restrictions or limitations on site access by sales and marketing representatives.”

University of Louisville School of Medicine

Detailing and Marketing:

“**Vendors may not product or brand detail (i.e., in-person marketing visits by vendors), or market, at UofL Health Care, the School of Medicine, and all other clinical, administrative, educational, and research venues and activities. Vendors may not give any form of food, cash, or material gifts** between them (or their companies) and University of Louisville-salaried faculty, staff, residents, fellows, and health care students in person, by phone, email, mail or any other means at **UofL Health Care** premises or at any UofL affiliated educational sites. Displays of products, cash incentive programs for prescribing, product pamphlets, pre-printed prescription pads with product names, and other materials are prohibited. Detailing and marketing at hospitals and facilities outside of UofL HealthCare and the School of Medicine will be governed by the policies and procedures of the individual institutions.”

Visits to Faculty by Appointment:

“**This policy does allow for visits by appointment** (as set forth by protocols approved by individual administrative units — i.e., Departments, Divisions, etc.) for updates on new products, education regarding existing products, discussions of support for unrestricted education grants, and supply of pharmaceutical samples, competitive selection by clinical committees for new products, services, or devices, and in-service training for products to faculty and staff that have been duly deliberated upon and selected for use at UofL Health Care. Vendors, who each must be credentialed with UofL Pharmacy or Operating Room, as applicable, will register with the inpatient pharmacy or the operating room scheduler's desk prior to all UofL visits and will be issued an appropriate ID badge.”

Access:

“**Vendors are not allowed into the following locations:** patient care areas, operating rooms, delivery rooms, emergency rooms, medical student and resident lounges, and staff elevators except only to provide in-service training or assistance on devices and equipment, for example, in the operating room. In such cases, there must be prior disclosure to and consent by the patient or surrogate (if the patient is incapacitated) whenever possible, i.e., if it is known ahead of time that a vendor will be involved. However, in such cases that crisis or emergency treatment with devices, equipment, etc. from a vendor is

required during an operation or procedure in order to provide the best care for the patient, and if the patient is incapacitated and no surrogate is available, the requirement for consent will be waived.”

Vendor/Student Interactions:

“Education programs for students, trainees, staff, and faculty should be developed and implemented by UofL-HSC schools and by individual departments on vendor marketing, as well as the subtle influences that such promotion has on physician decisions. If desired, one educational option is to have a vendor provide an interpretation of educational material on products, which would then be discussed and critiqued by a faculty member. Students may interact with vendors only in educational forums, and only when accompanied by faculty supervision.”

University of Massachusetts School of Medicine

“UMass Memorial does not support the use of our facilities by Clinical Vendors for marketing purposes. Therefore, Clinical Vendors presenting to UMMMM or UMMMG facilities or to meet with UMass Memorial personnel must comply with the following requirements:

1. Representatives should not be permitted in any patient care area unless *each* of the following exceptions are met:
 - a. The representative is present to provide in-service training on devices and other equipment, including provision of essential guidance on the use of such equipment,
 - b. The presence of the representative is expressly requested and approved in advance by a faculty member, and
 - c. The device representative is certified by their employer to provide the requested device training.
2. Representatives should never scrub or provide direct patient care services at UMass Memorial and, cannot be ‘Observers’ under UMMMM Policy #1413: Observers of Patient Care Activities
3. Representatives are permitted in non-patient care areas by scheduled appointment only. Therefore, representatives should not be in any UMass Memorial facility without a scheduled appointment with a faculty member or other authorized Clinical Personnel;
4. All representatives must be registered in the Vendormate system and must receive, wear and visibly display the appropriate one-day vendor badge at all times while on UMMMM premises:
 - a. All Clinical Vendors must register in Vendor Mate (the UMMMM on-line web-based tool), and when presenting onsite must sign in and generate a one-day badge to be worn visibly while onsite. Please see the link below to get to the Vendormate site. (<https://umassmemorial.vendormate.com/vm/login.do>);
 - b. If specifically approved by a senior vice president, a Clinical Vendor may be given a UMMMM ‘hard’ badge. If a senior vice president authorizes a ‘hard’ badge, they are responsible to ensure all appropriate vendor registration information is obtained (consistent with the Vendor Mate on-line tool) and that the Clinical Vendor has received and formally acknowledged an understanding and agreement to comply with UMMMM policies.”

University of Michigan Medical School

General:

1. Each facility at UMHHC will have a designated check-in area for vendors. The check-in function may be performed by a person for whom this is their sole responsibility, or it may be

incorporated into the existing responsibilities of an employee. Vendors are only permitted to visit faculty or staff by appointment.

2. All vendors are required to check-in at the designated area and receive an ID badge before proceeding to a department.
3. Vendors who show up at departments without checking in at the designated area and without valid identification, will be asked to leave the facility, or return to the designated area to check-in and receive proper identification.
4. If a vendor does not adhere to this policy, UMHHC Contracts and procurement will take action as appropriate, such as requesting a replacement vendor or limiting new business with the UMHHC.
5. Notices explaining the vendor policy will be posted at each entrance to UMHHC facilities. The notices will indicate the designated entrance and check-in area for that facility.
6. The University of Michigan reserves the right to limit the number of vendors that any single company has visiting UMHHC facilities.
7. Vendors visiting UMHHC for the sole purpose of initiating and monitoring IRB-approved research studies are exempt from this policy on those occasions only.

Access:

1. “Vendors are restricted in access to: physician’s offices, Contracts and procurement, department offices, Pharmacy administrative and Material Services offices (all by appointment only), conference rooms (by invitation only), and public areas.
2. Under most circumstances, vendors are prohibited from entering patient care areas within the hospitals and health centers including the: Emergency Department, the Operating Rooms, Medical Procedures Unit, Cardiac Study Unit, patient care units, outpatient clinics, clinic staff rooms, waiting rooms, and hallways, Pharmacy dispensing areas and the Material Services warehouse. An **exception** to this is a situation in which a vendor is required for training on new equipment or devices already purchased by UM, setting up such equipment, or similar activities associated with a contractually agreed to business purpose associated with new technology or devices. These cases must be approved by the appropriate director/chair/division or service chief and are subject to the confidentiality protections in the contract language and the Business Associate Agreement.
3. Vendors are not permitted in the House Officer Lounge. Vendors may leave a message with the appropriate department in order to arrange an appointment with a House Officer. Vendors may meet with House Officers in public areas such as the cafeteria.
4. Vendors are prohibited from attending any conference where patient specific information or quality assurance activities are being discussed (see confidentiality⁹).
5. Vendors shall only use elevators designed for visitor use.
6. Vendors may not use the UMHHC e-mail or paging systems to contact faculty or staff unless specifically requested by the faculty or staff member.
7. Vendors are not to place (or ask staff to place) information in mailboxes of any UMHHC faculty or staff unless specifically requested by the individual faculty or staff.”

Promotional Activities:

1. “Cash or other incentive programs are strictly prohibited at the UMHHC.

⁹ “All vendors who, in the course of providing necessary business services to UMHS, come in contact with patients or have access to identifiable health information must sign a Business Associate Agreement (available for the health System Attorney’s office) and abide by the UMHS Confidentiality of Patient Information Policy.”

2. No personal gifts of any kind from vendors to faculty or staff are permitted.
3. Vendors are not permitted to distribute, post or leave any type of printed or handwritten material, advertisements, signs or other such promotional materials anywhere on the UMHHC premises. Unsolicited materials may not be provided to clinicians; any promotional or informational material provided by a vendor must be explicitly requested by faculty or staff.
4. Distribution of vendor patient educational material that may be useful to our patients should be left at the appropriate department. Either the department or the Patient Education Oversight Committee must review all educational information before it is distributed to patients or families. Vendors are strictly prohibited from providing educational material of any type directly to patients or from leaving them in areas accessible to patients.
5. Only pricing/cost information which has been approved by UMHHC Contracts and Procurement may be discussed with clinicians. **Absolutely no contracts may be presented to clinical staff; all contracts must be routed through Contracts Procurement.**
6. Raffles, lotteries, or contests which provide the winner with gifts of any value are not permitted.
7. Promotion of drugs against UMHHC restrictions, drug utilization guidelines, or clinical guidelines/initiatives is prohibited. Non-formulary drugs or drugs not on the UMHS/FGP Preferred Drug List may only be discussed if the pharmaceutical vendor fully discloses this status to the UMHS faculty physician or staff member. Pharmaceutical vendors who do discuss such agents without an appropriate disclosure will be immediately suspended from visiting UMHHC sites pending review of the event.
8. Pre-printed prescription pads may not be distributed by pharmaceutical sales representatives.”

University of Pennsylvania School of Medicine

1. “Industry will not use the resources of educational or administrative offices of HUP/CPUP clinical departments to inform Professionals of promotional Industry-sponsored events.
2. Announcements of promotional Industry-sponsored events off campus may not be made via any mass mechanism, including UPHS or Penn e-mail, regular mail, e-page, or other mechanism controlled by UPHS, unless the event satisfies the conditions in Section B, Number
3. Educational or administrative offices, including residency and fellowship program offices, may not give promotional Industry representatives e-mail distribution lists or mailing lists to be used for announcement of Industry-sponsored events or meals, unless the event satisfies the conditions in Section B, Number 1.
4. Professionals may not accept compensation for time spent listening to Industry representatives detailing their products.
5. Industry representatives may interact with Professionals in certain designated areas. These are non-patient care areas, including non-patient sections of professionals’ offices, and public areas (such as the cafeteria). Professionals may not interact with Industry representatives in patient care areas, including inpatient units, nursing stations, conference rooms of patient care units, physician lounges, patient care areas of outpatient offices, perioperative and operative areas, and the Emergency Department.
6. Industry representatives may not attend Professionals’ conferences or reports. Representatives may not see patients, review any part of the medical record (whether in electronic or paper format), go on rounds, or attend surgery without patient authorization or an appropriate Business Associate Agreement (see HIPAA Policy #1-12-H4 regarding Business Associates).
7. Professional staff may not participate in Industry sponsored financially remunerated on-line marketing activities during the work day. This prohibition extends to third party organizations that produce marketing or educational materials for the pharmaceutical industry.”

University of Pittsburgh School of Medicine

“As charitable institutions dedicated to advancing the public interest, the SOHS and UPMC should not allow use of their facilities or other resources for marketing activities by Industry. The University and UPMC always reserve the right to refuse access to their facilities or to limit activities by Industry representatives consistent with their non-profit mission. However, interaction with representatives of Industry is appropriate as it relates to exchange of scientifically valid information and other data, interactions designed to enhance continuity of care for specific patients or patient populations, as well as training intended to advance healthcare and scientific investigation. To balance these interests, UPMC’s Supply Chain Management, and the University’s Purchasing departments will develop a registry to assist in the management of site access by Industry representatives for appropriate purposes. Sales or marketing representatives of Industry may access SOHS or UPMC facilities only if the company with which they are associated has registered with UPMC Supply Chain Management, or, where Industry representatives seek access to the School of Dental Medicine, the University’s Purchasing Department, and they have been specifically invited to meet with an individual healthcare provider or a group of healthcare providers for a particular purpose. Individual physicians or groups of physicians or other healthcare professionals may request a presentation by or other information from a particular company through the respective purchasing/supply chain management department or other designated institutional official. UPMC Supply Chain Management will provide names of registered Industry representatives to the University upon request.

Representatives without an appointment as outlined above are not allowed to conduct business inpatient care areas (inpatient or outpatient), in practitioners’ office areas, or other areas of SOHS or UPMC clinical facilities.

All Industry personnel seeking sales or vendor relationships must work directly with the UPMC Supply Chain Department (or the University Purchasing Department when seeking access to the School of Dental Medicine). While in SOHS or UPMC facilities, all Industry representatives must be identified by name and current company affiliation in a manner determined by such department, as applicable.

All Industry representatives with access to University and UPMC clinical facilities and personnel must comply with institutional requirements for training in ethical standards and organizational policies and procedures.”

University of Toledo College of Medicine

“Pharmaceutical and medical device representatives are to be prohibited from having any non-faculty mentored interactions with students or residents. This and all other provisions in this policy will apply to all educational sites, except for the AHEC programs and private physician offices.”

“Pharmaceutical and medical device representatives and other vendors may provide approved patient education and patient support information to inpatient and outpatient nursing units, pharmacy, operating room and other relevant UMC units. Branding with product name is not acceptable, unless for patient support or education with that product.”

“Pharmaceutical and device industry representatives are permitted to visit the UT-UMC, provided they register and conduct themselves in accordance with University of Toledo Medical Center policy number 20-44.”

“Pharmaceutical and medical device representatives will be required to take a two-hour UT-sponsored education class on relations between industry and UT students and residents.”

Yale University School of Medicine

“Pharmaceutical representatives are not allowed in patient care areas. Therefore, YMG physicians should meet with pharmaceutical representatives only in non-patient care areas.”

D. Continuing Medical Education (See also Industry-Sponsored Programs)

Boston University School of Medicine

“Clinicians should be aware of the Standards for Commercial Support established by the ACCME and the ADA CERP. A complete description of the Standards of the ACCME to ensure independence in CME activities is available at http://www.accme.org/dir_docs/doc_upload/68b2902a-fb73-44d1-8725-80a1504e520c_uploaddocument.pdf .

All continuing education events at BMC or BUSM must fully comply with ACCME guidelines (or where pertinent, to the ADA CERP) **whether or not formal CME credit is awarded.** ...

In addition to complying with the ACCME Standards (or where pertinent, ADA CERP), educational events supported by industry at BMC or BUSM must also comply with the policies described under Sections 1 and 2 [“Provision of Compensation or Gifts from Industry to Clinicians”, and “Provision of Scholarships and other Funds to BUMC Trainees”].”

Mount Sinai School of Medicine

“Vendor support for Mount Sinai-sponsored educational events, whether held on campus or off-campus, will only be accepted in accordance with the following provisions:

1. Deposit to General Fund
2. Food and Beverages¹⁰
3. Continuing Medical Education
4. Program Content
5. Acknowledgment of Vendor Support
6. Vendor Support for Trainees
7. Education and Training on Vendor’s Own Products”

Deposit to General Fund:

“With the exception of CME events (see [Section III-C](#) of this policy), any vendor contribution must be in the form of a general educational grant paid directly to a School or Hospital fund. No direct payments may be made to any Mount Sinai faculty member, trainee, or employee. Mount Sinai shall retain exclusive responsibility for all aspects of educational events. Corporate sponsors may not make commercial exhibits, distribution of promotional materials or the inclusion of company representatives a requirement for support. A [letter of agreement](#) outlining expectations and restrictions will be signed by both the department Chair and the vendor.”

Continuing Medical Education:

“Vendor support for accredited continuing medical education (CME) programs must be submitted in accordance with the policies and procedures of Mount Sinai's [Page and William Black Post Graduate School for Continuing Medical Education](#) Vendor support for CME programs will be managed in accordance with the [Standards for Commercial Support](#) of the Accreditation Council for Continuing Medical Education (ACCME), including:

1. Independence from commercial interests in course goals, content and methods

¹⁰ We have not included in this section the language for Food and Beverages, Continuing Medical Education, and Vendor Support for Trainees. Please see the corresponding sections for “Food”, “Continuing Medical Education”, and “Industry-Sponsored Scholarships and Other Educational Funds for Trainees”.

2. Resolution of personal conflicts of interest
3. Bias-free content and format
4. Disclosures relevant to potential commercial bias
5. Management of commercial promotion”

Program Content:

“Programs must have true educational value and can never be designed to influence purchasing decisions. The [Standards for Commercial Support](#) of the Accreditation Council for Continuing Medical Education (ACCME) are applicable to all educational events, whether or not they fall under the auspices of the Post-Graduate School; guidelines include:

1. Curriculum content, faculty selection and program quality will be the sole responsibility of Mount Sinai department management and/or faculty involved in the event.
2. Speaker selection and educational content will be at the discretion of the department.
3. Guest speakers must sign a standard [Disclosure Statement](#) indicating compliance with institutional conflict of interest policies.
4. All presentations must be free of commercial bias for or against any vendor's products or services. Generic rather than trade names of drugs must be used at conferences.
5. Vendor representatives may not address the audience unless specifically invited by the Mount Sinai event organizers.
6. Promotional materials from commercial sponsors may not be displayed in the room before, during or after the activity.
7. Vendors may apply for exhibit space outside the room(s) in which the educational event is held. The granting of such requests is at the discretion of the conference organizers and fees may be levied. In the event that exhibit space is approved, exhibitors will be subject to gift restrictions as described in [Section I](#) [“Introduction”] of this policy, as well as to the [PhRMA Code](#).
8. Refreshments, study materials, etc. should be appropriate to the event.”

Acknowledgement of Vendor Support:

“Commercial support may be acknowledged in printed materials, but specific products may not be mentioned.”

Stanford University School of Medicine¹¹

“Individuals should be aware of the ACCME Standards for Commercial Support. They provide useful guidelines for evaluating all forms of industry interaction, both on and off campus and including both Stanford- sponsored and other events. ...

All education events sponsored by the Stanford School of Medicine, Stanford Hospital and Clinics or the Lucile Packard Children’s Hospital must be compliant with ACCME Standards for Commercial Support *whether or not CME credit is awarded.*”

“Effective immediately, all CME programs and activities must be administered by the Office of CME and must adhere to the policies of the ACCME and to those of the School of Medicine. No other programs will be sanctioned by the School of Medicine and Stanford University. Permission to use the Stanford name for continuing medical education or related programs, whether ACCME accredited or not, must be approved and administered by the Stanford Office of CME on behalf of the Dean. The use

¹¹ In addition to Stanford University’s “Interactions” policy, a separate Continuing Medical Education policy is also operative. Both are cited in the reference section.

of outside vendors by faculty through departments or other entities may not include the use of the Stanford name unless specifically approved by the Office of CME on behalf of the Dean.

The guiding principle is that all CME programs must be free of commercial influence, be based on the best scientific evidence available, and be focused on improving the knowledge of learners. Effective September 1, 2008, new commercial funding for specific CME courses or programs is prohibited. Commercial support includes monetary contributions as well as ‘in kind’ support such as a loan or donation of equipment or supplies as well as services from a commercial entity. This policy applies to both on and offsite venues and functions that propose to use the Stanford name or that are directed or initiated by Stanford School of Medicine faculty. This also includes payments for third party sources or for-profit course organizers that have received industry support. Exhibitions by commercial organizations are not permitted at CME activities whether onsite or offsite locations.

At the same time, the School recognizes that industry may wish to provide CME program support that is not designated to a specific subject, course or program but that is intended for use in a broadly defined field or discipline or field of study. Accordingly, if such support from industry for CME is received it must be directed to the Office of Continuing Medical Education. The Office of Continuing Medical Education will be responsible for coordinating and distributing funds for CME programs in the following general categories: medical, pediatric and surgical specialties; diagnostic and imaging technologies and disciplines; health policy and disease prevention; or other areas approved by the Office of CME. Such industry support cannot be designated for a specific course or program, but every effort will be made to direct support, as appropriate, to the specified general areas of interest, as noted above. Further, commercial support received by faculty or academic units for other purposes cannot be used to support CME. The faculty, in conjunction with the office of CME, will decide the choice of topic and content for all Stanford CME activities, and curricula will be chosen based on the educational needs of our learner populations.”

University of California, Davis School of Medicine

“CME funds will be managed in accordance with national continuing education accrediting body conflict of interest standards even when the meetings are not accredited continuing education programs.”

University of California, Los Angeles David Geffen School of Medicine

“All events that receive industry support and are sponsored by the School of Medicine or the Medical Enterprise must be compliant with ACCME Standards for Commercial Support *whether or not CME credit is awarded*. This includes not only educational events, but also other professional activities such as faculty or staff meetings, regardless of whether these events occur on or off the UCLA campus.

Industry grants to support educational or professional activities must comply with ACCME Standards and must be administered by departments or divisions and not by individual faculty. Faculty, staff, and trainees should become familiar with the ACCME Standards for Commercial Support.”

“Industry sales representatives have the same access to the official educational offerings of the University as other members of the general public. Generally, these are official courses of the University or CME programs in accordance with ACCME guidelines. Faculty or departments should not offer preceptorships to industry representatives without involvement of the Office of Continuing Medical Education in the School of Medicine or, for the clinical neurosciences, the Office of Professional and Community Education in the Semel Institute.”

University of California, San Francisco School of Medicine

“Vendors and other industry representatives may provide unrestricted funds to departments or divisions for educational programs. The funds will be managed according to the Standards for Commercial Support of the ACCME.”

1. “Commercial support for educational programs must be free of actual or perceived conflict of interest.
2. All educational programs within the School of Medicine must abide by the Standards for Commercial Support established by the ACCME. This requirement applies to all undergraduate, graduate and continuing medical education programs regardless of whether continuing medical education credit is offered.
3. All funds provided by industry or an industry representative to support educational programs must be given to the University as an unrestricted grant. The funds can be provided to the Department, Program or Division, but cannot be given to an individual faculty member, student or staff. This requirement applies to all funds for meals or refreshments, speaker honoraria, or any other expense related to an educational program and includes noon conferences, grand rounds, and lectures at all UCSF sites. Funds that are provided by educational groups or other entities that act as “intermediaries” for industry must also be provided as unrestricted grants.
4. No gifts may be accepted in exchange for listening to a lecture or presentation by a representative of a commercial entity that produces health care or medical goods and services.
5. Vendors may provide educational activities on a UCSF site only if they are requested to do so by the department chair or designee. Participants in an educational program may not be required to attend any educational session in which an industry representative disseminates information about their products or services except when such services are provided as part of a contract for in-service or other training as part of an executed purchase decision.
6. The content of all educational programs will be determined by the UCSF program planning group and, when appropriate the CME office. Industry sponsors of educational programs may not determine the content or selection of speakers for educational programs.
7. These requirements do not apply to meetings governed by ASCCME Standards or meetings of professional societies and other professional organizations that may receive partial industry support.”

University of Cincinnati College of Medicine

“All continuing medical education events sponsored by or accredited by the University of Cincinnati College of Medicine must be compliant with ACCME Standards for Commercial Support whether or not CME credit is awarded. The Standards may be found at <http://www.accme.org>.”

Support for Educational Activities:

“Educational grants that are compliant with the ACCME Standards may be received from Industry but must be administered by departments or divisions of the College of Medicine and not by individual faculty.”

“Gifts other than educational material approved by the faculty director of the educational event may not be provided at educational events sponsored or accredited by the University of Cincinnati College of Medicine.”

University of Louisville School of Medicine

“This policy does allow for unrestricted educational *topic-focused or general* grants from vendors for Continuing Medical Education (CME) and Graduate Medical Education (GME) activities.

Unrestricted educational grants from pharmaceutical companies and medical equipment companies are allowed for the purchase of educational needs as warranted for patient and medical education and patient care, either in an open (unspecified) manner or with acknowledgement that it is focused on a specific area of educational focus. Additionally, these grants can be used for educational related expenses (e.g., staff, resident, faculty lunch-based presentations). These CME symposia may not involve marketing, detailing, or advertising of brand names or products, and the granting companies may not select paid lecturers or require the inclusion or exclusion of medications purchased for patient care. These symposia will comply with all CME regulations. CME symposia (i.e., ACGME accredited and in compliance with ACGME guidelines) may provide food purchased with these grants. Vendors may restrict the educational grant to cover specific educational topics (e.g., breast cancer or heart disease) so long as the above listed requirements are met. Recognition of these grants may consist of attribution (e.g., in brochures for conferences, graduation event agenda, acknowledgement slides in presentations, and wall plaques of thanks) for contributions received.

1. **Funds designated to specific units will be kept in designated unit accounts through the Assistant Vice President for Finance, UofL Executive Vice President for Health Affairs (EVPHA) office**, with these funds channeled through a central administrative account, but with separate accounts kept for each unit. Individual Departments of the School of Medicine will administer these grants and will be responsible for their collection and expenditure. Annual reporting of the receipt of such grants and their expenditure will be provided to the Dean of the School of Medicine, Dentistry, or Nursing as appropriate. Any perceived violation of the conditions outlined above will be reported to the appropriate Dean.
2. **General grants (i.e., non-unit or topic specific) will be placed in trust within the Assistant Vice President for Finance, UofL EVPHA office**, and administered as deemed appropriate under the supervision of a Faculty Oversight Committee elected from the Executive Faculty.”

University of Massachusetts School of Medicine

“All CME and GME events hosted or sponsored by UMMMC or UMMMG must comply with the requirements below and the ACCME Standards for Commercial Support (Attachment B) whether or not CME credit is awarded:

1. **UMass Memorial Foundation.** All funding from Clinical Vendors to support CME and GME programs must be directed to the UMass Memorial Foundation. Funding may be restricted to a clinical department and must be overseen by the Department Chair. Funding may not be restricted to a clinical division, a specific program or an individual physician. An oversight committee comprised of physician and other leaders will oversee Clinical Vendor sponsorship exceeding established thresholds (see below) to ensure potential conflicts of interest are appropriately managed.
2. **ACCME Standards.** Funding associated with such meetings may be used to support CME programs, including speakers and reasonable and appropriate provisions of food and facilities consistent with ACCME standards. Payments to faculty associated with such meetings must fully comply with Section (D) – *Consulting or Service Agreements*, below.
3. **Prohibition on Food.** Clinical Vendors are not permitted to bring food into any UMass Memorial facility or to any meeting sponsored by UMass Memorial on or off campus and are prohibited from paying for such food.

4. **Allowance of Product Symposia.** Product Symposia organized by UMass Memorial exclusively for the education of Clinical Personnel, UMass Memorial patients or the broader community are permissible. Clinical Vendor products directly related to a UMass Memorial educational event may be displayed and discussed as part of the educational event. Clinical Vendor funding to support these activities is acceptable provided it is processed consistent with this section.
5. **Prohibition on Clinical Vendor Product Fairs.** Clinical Vendor Product Fairs are prohibited. Clinical Vendors are never be permitted to display or market any products on any UMass Memorial premises, unless they are directly related to a UMass Memorial sponsored educational event, as noted above.
6. **UMass Memorial and UMass Medical School Sponsored Meetings.** International, national and regional meetings co-sponsored by UMass Memorial or UMass Medical School are designed to benefit the broader community of physicians and are permissible. Industry funding to support such meetings is acceptable provided such funding is exclusively for support of such meetings and not to otherwise directly benefit UMass Memorial or UMass Medical School.
7. **Oversight Committee.** An oversight committee of rotating UMass Memorial and UMass Medical School physician leaders will function in an advisory capacity regarding the implementation and oversight of this policy and, will review and oversee industry sponsorship to assess potential conflicts of interest and to propose approaches for management of such potential or actual conflicts of interest. The oversight committee will review any vendor contribution exceeding \$10,000 in support of CME, GME (fellowship or other support), or general research support in any one fiscal year. The committee shall also have the following responsibilities:
 - a. Assess potential conflicts of interest associated with other financial relationships involving the sponsoring vendor and targeted department or division, such as CME/GME support, clinical research funding and vendor purchases;
 - b. Develop corrective action plans, if necessary, with department chairs to manage potential conflicts within their departments;
 - c. Review uses of funds for consistency with this policy;
 - d. Review aggregate vendor contributions and associated expenditures semiannually;
 - e. Advise Chairs, Executive Management and the Executive Management Compliance Committee regarding potential and actual conflicts of interest, or suggested changes to policy or procedure.”

University of Michigan Medical School

1. “Vendors shall not sponsor any educational programs without approval by the Department Director, Department Chair, Division Director, Section Chief, Service Chief or Residency Program Director. In all cases, the selection of speakers and assurance of the educational integrity of the program is the responsibility of the responsible UM faculty member or program chair. While the support of vendors for educational programs may be acknowledged, vendors must not speak or present information in conjunction with education program time. Further, there can be no activities to promote or market specific products in conjunction with educational time.
2. Vendors shall not attend programs intended specifically for medical students, house staff and faculty or staff without prior permission of the responsible faculty member or program chair. Even if permission to attend is granted, Vendors are not permitted to speak, nor to promote or market products at these programs.

3. Vendors shall not attend programs in which specific patients are identified or when quality assurance or risk management issues are presented.”

University of Pennsylvania School of Medicine

“Industry representatives may provide educational grants for non-CME programs through departments and divisions only. At the discretion of the Chief or Chair, such support may be used for medical education purposes including honoraria and expenses for extramural lecturers and the provision of modest meals. Support for CME may only be made through educational grants made directly to the Trustees of the University of Pennsylvania/CME. All commercial support grants associated with a CME program must be given with the full knowledge and approval of the University of Pennsylvania School of Medicine (U Penn SOM) Office of CME. The terms, conditions, and purposes of the commercial support must be documented in a written agreement between the commercial supporter and the U of Penn SOM Office of CME. Educational grants should not be made or conditioned or related in any way to any pre-existing or future business relationship with the Industry company or any business or other decisions UPHS has or may make relating to the Industry company or its products (including coverage or formulary status decisions). The content of the educational program, educational methods and materials should be consistent with applicable rules and requirements for accredited CME programs and controlled by the course provider and may not be controlled by the Industry company providing the educational grant.”

University of Pittsburgh School of Medicine

“Industry support of continuing education (‘CE’) in the health sciences can provide benefit to patients by ensuring that the most current, evidence-based medical information is provided to healthcare practitioners. In order to ensure that potential for bias is minimized and that CE programs are not a guise for marketing, all CE events hosted or sponsored by the SOHS, UPMC, or University of Pittsburgh Physicians (‘UPP’) must comply with the ACCME Standards for Commercial Support of Educational Programs (or other similarly rigorous, applicable standards required by other health professions), whether or not CE credit is awarded for attendance at the event. All such agreements for Industry support must be negotiated through and executed by the Center for Continuing Education in the Health Sciences (‘CCEHS’), and must comply with all policies for such agreements. Any such educational program must be open on equal terms to all interested practitioners, and may not be limited to attendees selected by the company sponsor(s). Industry funding for such programming should be used to improve the quality of the education provided and should not be used to support hospitality, such as meals, social activities, etc., except at a modest level. Industry funding may not be accepted for social events that do not have an educational component. Industry funding may not be accepted to support the costs of internal department meetings or retreats (either on- or off- campus).”

“SOHS or UPMC facilities (clinical or non-clinical) may not be rented by or used for Industry funded and/or directed programs, unless there is a CE agreement for Industry support that complies with the policies of the CCEHS. Dedicated marketing and training programs designed solely for sales or marketing personnel supported by Industry are prohibited.”

University of Toledo College of Medicine

“Industry support of symposia, conferences and other events designed for post-graduate physicians, nurses, physician assistants and other health professionals in Northwest Ohio and beyond, which are sponsored totally or in part by the UT Office of Continuing Medical Education or the Office of Continuing Nursing Education (CNE), will be encouraged. Sponsor support will be officially

acknowledged. Booths, tables and displays to provide product information will continue to be permitted.”

Vanderbilt University School of Medicine

“All educational events sponsored by VUMC and its affiliates must be compliant with ACCME Standards for Commercial Support whether or not CME credit is awarded.

1. Educational grants that are compliant with the ACCME Standards may be received from industry, but must be administered by departments, centers, institutes, or divisions and not by individuals.
2. The Division of Continuing Medical Education should be informed in advance of requests for grants to support educational events. Agreements governing grants supporting educational events must receive prior approval by the Division of Continuing Medical Education.
3. Divisions and departments must maintain records of compliance with ACCME Standards in a manner consistent with the guidelines of the Division of Continuing Medical Education.

Yale University School of Medicine

“YMG physicians should be aware of the Standards for Commercial Support established by the Accreditation Council for Continuing Medical Education. ...

All educational events sponsored by industry on the Yale campus must be fully compliant with ACCME guidelines regardless of whether formal CME credit is awarded or not.”

“In addition to the aforementioned ACCME Standards,¹² educational events sponsored by industry on the Yale School of Medicine campus should comply with the following provisions:

1. Gifts of any type are not distributed to attendees or participants before, during, or after the meeting or lecture;
2. Funds to pay for the specific educational activity are provided to the Department, Program, or Section and not to an individual faculty member.”

¹² ACCME Standards are not included in this document.

E. Participation in Industry-Sponsored Programs, Speakers Bureaus, and Consulting (See also Continuing Medical Education)

Boston University School of Medicine

Compensation from Industry to Clinicians:

“Clinicians may accept only fair market compensation for specific, legitimate services provided by him or her to industry. The terms of the arrangements, services provided, and compensation must be set forth in writing.

Clinicians may not accept compensation for listening to a sales presentation (e.g., detailing) by an industry representative.

Clinicians who are simply attending a Continuing Medical Education (‘CME’) or other instructional activity, and are not speaking or otherwise actively participating or presenting at the meeting, may not accept compensation from companies either for attending or defraying costs related to attending the meeting.”

Meetings of Clinicians Off-Campus:

“Clinical meetings and scientific meetings sponsored by professional societies frequently derive a portion of their support from industry. Such support may give rise to inappropriate industry influence on the content of the conference or its attendees. Grants for meetings and conferences that originate from the company’s marketing division may be particularly problematic. Industry support generally takes one of two forms and different standards apply in each case.

1. First, industry may partially support meetings run by professional societies. Clinicians are expected to participate in meetings of professional societies as part of their CME and professional obligations. Nonetheless, faculty should be aware of the potential influence of industry on these meetings and attentive to the guidelines set forth below in evaluating whether and how to attend or participate in these meetings.
2. A second type of meeting is fully supported by industry. These guidelines apply to all lectures, meetings, and related publications supported directly by industry, and CME activities fully supported by industry or managed by intermediate educational companies subsidized by industry. Clinicians may actively participate (e.g., giving a lecture, organizing the meeting) in such meetings or lectures only if:
 - a. Financial support by industry is fully disclosed at the meeting by the sponsor.
 - b. The meeting or lecture’s content, including slides and written materials, are determined by the clinician.
 - c. The clinician delivering a lecture is expected to provide a balanced assessment of therapeutic options and should promote objective scientific and educational activities and discourse.
 - d. The clinician is not required by the company sponsor to accept advice or services concerning teachers, authors, or other educational matters including content as a condition of the sponsor’s contribution of funds or services.
 - e. The clinician receives compensation only for the services provided and the compensation is fair market compensation.
 - f. Time spent in preparing and delivering the lectures does not impair the clinician’s ability to fulfill Departmental responsibilities.

- g. The clinician delivering the lecture explicitly describes all his or her related financial interests (past, existing, or planned) to the audience.
- h. The clinician makes clear to the audience that the content of the lecture reflects the views of the clinician and not those of BMC or BUSM.
- i. Clinicians should not facilitate the participation of trainees in industry-sponsored events that fail to comply with these standards.”

Mount Sinai School of Medicine

Vendor Support for Off-Campus Events:

“If off-campus events are sponsored by industry, employees and trainees are encouraged to participate only when Continuing Medical Education (CME) credit is offered. For events that fall outside the realm of CME, following are guidelines for participation:

1. Educational Value of Event
2. Speaking Engagements
3. Paid Engagements
4. Vendor Support to Participate in Events

Educational Value of Event:

“Discretion must be employed in determining whether to attend, based on whether the event has a legitimate educational value. For example, industry sponsors often organize their own conferences and invite faculty or trainees to attend; it is incumbent upon the invitee and his/her Chair to determine whether it is truly a learning event or is designed primarily to influence participants to favor the vendor's products. The setting for and cost of the event should be appropriate to its purpose.”

Speaking Engagements:

“Lectures are often arranged through a corporate Speakers Bureau, and may involve compensation. Participation can be of value to the invited speakers as well as to conference attendees, and can enhance Mount Sinai's reputation. At times, however, events sponsored by vendors are designed to influence participants in their relationship with the vendor. Further, participants in Speaker's Bureaus may be asked to use materials prepared by the vendor. It is therefore essential that faculty and staff participate in such events only when there is a legitimate educational purpose and the individual's role is meaningful and substantive and reflects his or her own work”

Paid Engagements:

“Faculty who receive compensation for participating in off-campus events outside the scope of CME will be subject to the MSSM [Policy on Financial Arrangements with Extramural Entities](#), and must submit written agreements for approval by the Department Chair prior to participation. Faculty must also adhere to CME guidelines concerning disclosure. For engagements involving expert training, the individual must also abide by the guidelines of the relevant professional organizations.”

Consulting/Relationships with Outside Entities:

“There is a potential for a conflict of interest in any business relationship between a member of the Mount Sinai faculty or staff and an outside company or organization. Relationships can take many forms, including: membership on boards of directors or scientific advisory boards; review/evaluation of efficacy of new products or devices for vendors; consulting with institutions on behalf of a vendor; expert witness testimony, etc.”

“Full-time faculty must have all of their outside relationships reviewed and approved in accordance with the Policy on [Financial Arrangements With Extramural Entities](#). This policy includes a description of time restrictions relating to arrangements with outside entities.

Members of the management staff must submit a written description of the arrangement, including estimated time required and remuneration, to the Chairman or Senior Vice President in charge of their department. Staff can only take time off from their regular duties if prearranged through the appropriate Chair or Senior Vice President.”

Stanford University School of Medicine

“Individuals may not accept compensation, including the defraying of costs, for simply attending a CME or other activity or conference (that is, if the individual is not speaking or otherwise actively participating or presenting at the event).”

“Faculty and medical staff should evaluate very carefully their own participation in meetings and conferences that are fully or partially sponsored or run by industry because of the high potential for perceived or real conflict of interest. This provision does not apply to meetings of professional societies that may receive partial industry support, meetings governed by ACCME Standards, and the like.

Individuals who actively participate in meetings and conferences supported in part or in whole by industry (e.g., by giving a lecture, organizing the meeting) should follow these guidelines:

1. Financial support by industry is fully disclosed by the meeting sponsor.
2. The meeting or lecture content is determined by the speaker and not the industrial sponsor:
3. The lecturer is expected to provide a fair and balanced assessment of therapeutic options and to promote objective scientific and educational activities and discourse
4. The Stanford participant is not required by an industry sponsor to accept advice or services concerning speakers, content, etc., as a condition of the sponsor’s contribution of funds or services.
5. The lecturer makes clear that content reflects individual views and not the views of Stanford School of Medicine, Stanford Hospital and Clinics or the Lucile Packard Children’s Hospital
6. The use of the Stanford name in non-Stanford event is limited to the identification of the individual by his or her title and affiliation.”

University of California, Los Angeles David Geffen School of Medicine

“Faculty and medical staff should evaluate very carefully their own participation in meetings and conferences that are fully or partially sponsored or run by industry because of the high potential for perceived or real conflict of interest. Individuals should actively participate in meetings and conferences supported in part or in whole by industry (e.g., giving a lecture, organizing the meeting) only if the meetings and conferences follow these guidelines:

1. Financial support provided by industry is fully disclosed by the meeting sponsor;
2. The lecturer is solely responsible for the content of the lecture. The lecturer is expected to provide a fair, balanced, and where possible evidence-based assessment of therapeutic options and to promote balanced discussion of the topic. The lecturer prepares his or her slides and other educational materials and does not delegate this to industry sponsors;
3. The meeting organizer is not required by an industry sponsor to accept advice or services concerning speakers, content, or meeting organization as a condition of the sponsor’s contribution of funds or services;

4. These provisions do not apply to meetings of professional societies that may receive partial industry support, or other meetings governed by ACCME Standards, where outside organizations take responsibility for ensuring that presentations are free of commercial influence.”

University of California, San Francisco School of Medicine

“Individuals may not accept compensation, including reimbursement for expenses associated with attending a CME or other activity in which the attendee has no other role. Reasonable honoraria and payment of expenses may be provided for speakers at accredited educational meetings, consistent with guidelines developed by the Accreditation Council for Continuing Medical Education (ACCME) and University policy.”

“Individuals who actively participate in meetings or conferences that are supported in whole or in part by industry, including lecturing, organizing the meeting or moderating sessions should abide by the following requirements:

- a. Financial support should be fully disclosed by the meeting sponsor
- b. The content of the meeting or session must be determined by the speaker, not the industry sponsor
- c. The speaker must provide a fair and balanced discussion
- d. The speaker must make clear that the comments and content reflects the individual views of the speaker and not the University of California, the UCSF School of Medicine, or the Department”

“Faculty, students and staff should carefully evaluate whether it is appropriate to participate in off-campus meetings or conferences that are fully or partially sponsored by industry because of the high potential for real or perceived conflict of interest.”

University of Cincinnati College of Medicine

Support for Educational Activities:

“Faculty and medical staff should evaluate carefully their own participation in or attendance at meetings and conferences that are fully or partially sponsored or run by Industry because of the potential for conflict of interest. Meetings and conferences supported in part or in whole by Industry should follow these guidelines:

1. Financial support by Industry is fully disclosed by the meeting sponsor.
2. The educational content promotes scientific and educational activities and discourse.
3. The name of the University of Cincinnati or its College of Medicine may not be used in a way which suggests commercial endorsement. The use of the name of the University or the College of Medicine in connection with non-University of Cincinnati-Sponsored events is limited to the identification of the participating University of Cincinnati individual by his or her title and affiliation.

It is recognized that industry sponsored literature and models are utilized for teaching purposes in our clinical and education programs because of their benefit to patients. Information provided by unbiased sources is preferred. However, industry sponsored literature and models may be utilized with the following provisions intended to minimize marketing and advertising influence:

1. The materials are used solely for education.
2. The clinician decides when they are utilized, not the industry representative.
3. The materials are not overtly promotional in nature.

4. The educational literature and models must not be displayed publicly in a manner intended for the purpose of product promotion.”

Consulting:

“Faculty members and staff of the College of Medicine may engage in collateral employment with Industry, including work of a consulting nature, provided information regarding such employment is made known in advance to the individual’s department head and the Dean of the College of Medicine and provided said department head and Dean agree that the collateral employment:

1. Does not interfere with nor is inconsistent with the performance of the individual’s university duties; and
2. Does not raise questions of conflict of interest in connection with other interests or work in which the individual or the College is involved.

Reporting of collateral employment shall be made in accordance with University Rule 30-21-02 (‘Policy on Collateral Employment for Faculty Members and Librarians’) and 30-21-03 (‘Collateral Employment Policy for All Employees (Excluding Faculty Members and Librarians’) on University of Cincinnati forms provided for that purpose. Any proposed collateral employment may be subject to the development of an acceptable conflict management plan or other mechanism designed to ensure that such collateral employment will comport with the requirements of this Policy.”

University of Louisville School of Medicine

“While *UofL*-salaried faculty, staff, residents, fellows, and health care students are personally prohibited from accepting any form of gifts, food, or products (of any type or value) from vendors or their companies, at *UofL Health Care* Kentuckiana locations, other forms of professional interaction, employment, and consulting do exist. Although this policy does not call for institutional policing of off-site activities (i.e., vendor gifting in person, or by phone, e-mail, mail or any other means at any time outside the *UofL* premises to faculty, staff, residents, fellows, and health care students), adherence to the principles outlined in this policy is not reserved for duty hours.

Off campus, non-*UofL* endeavors (such as paid lectureships) are strongly discouraged. Research relationships by *UofL* personnel are covered by this policy, as well as by the *UofL* policy on Conflict of Interest. *UofL* personnel who are hired speakers for Vendors as well as all researchers funded by any Vendor will fully disclose any potential commercial bias at all presentations and interactions, will not allow their own relationship to bias the content of the lecture, and will not accept payments from Vendors for their services above fair market value.”

“It is recognized that **members of the faculty may, in the course of their leadership roles in non-profit professional and scientific organizations, be expected to participate in programs, meetings, and events that involve Vendor relationships.** Vendor interaction of *UofL* faculty members in the course of representing legitimate professional organizations will be governed by the policies and procedures of the specific organization.”

University of Massachusetts School of Medicine

Speaking arrangements/Speakers Bureaus:

“UMass Memorial endorses the use of lectures to disseminate knowledge evolving from clinical or research developments.

1. **General:** These lectures should be based upon Clinical Personnel research or scientific or professional knowledge and should incorporate materials developed exclusively by the faculty member with no Clinical Vendor input or requirement for approval. Clinical Personnel should not participate in or accept compensation for any lecture not meeting these requirements.
2. **Speakers Bureaus:** UMass Memorial views speakers bureaus sponsored by Clinical Vendors as an extension of the marketing process. Consistent with this policy, UMass Memorial prohibits Clinical Personnel from participating in, or receiving compensation for, talks given through a speakers bureau.”

Consulting or Service Agreements:

“Consulting arrangements that simply pay Clinical Personnel a guaranteed amount with minimal or no associated duties or deliverables (such as participation on scientific advisory boards that do not regularly meet and provide scientific advice) or excessive compensation for the services provided shall be considered gifts and are consequently prohibited. All consulting agreements must meet the following requirements to be acceptable:

1. **Contract.** Consulting should be supported by a written contract with specific deliverables, which must be restricted to scientific issues - not marketing and which require Clinical Personnel technical and professional judgment or assessment.
2. **Scientific Issues.** The specific and substantive deliverables in the written agreement must be restricted to scientific issues such as:
 - a. design of a new clinical trial or conduct of an existing clinical trial with which UMass Memorial is involved;
 - b. development of a new diagnostic, therapeutic or technical product; or
 - c. development of an educational product
3. **Compensation and Reimbursement.**
 - a. The compensation paid must be reasonable and reflect fair market value for the services and time provided;
 - b. The compensation paid must not be considered excessive when looked at overall for all time expended for consulting or honoraria;
 - c. All services must be performed on personal time unless the consulting income is paid to the UMMM; and
 - d. Travel and expense reimbursement must be reasonable and necessary for the provision of the above services
4. **Research Grants and Honoraria.**
 - a. Grants for general support of research are acceptable if not directed to or designated for use by specific individuals. Research grants should not be accepted or utilized to support research unless it is carried out independently and objectively for purposes of the advancement of scientific knowledge or clinical efficacy. Research funding should never be accepted or used to support marketing research. Honoraria should not be accepted unless the UMass Memorial Clinical Personnel is leading or presenting at a conference.”

University of Pennsylvania School of Medicine

Consulting/Travel:

1. “HUP/CPUP Professionals should not participate in Industry marketing activities.
2. Professionals may accept reimbursement (of travel, meals and other expense) for presenting research findings at a meeting, presenting on clinical topics or consulting during ‘1 day in 7’ time (for full time members of the University of Pennsylvania Faculty), provided that the

expenses are reasonable in relation to the services provided (fair market value). With regard to reimbursement to HUP/CPUP for enrollment of patients in clinical trials, the amount of reimbursement should cover the direct and indirect costs to the University of Pennsylvania, should be part of the study budget and proportionate to the scientific value of the clinical trial. Professionals may not accept reimbursements to provide lists of patients to industry (for example, a list of patients taking a certain medication or class of medications).

HUP/CPUP Professionals may not accept funds directly from Industry for the purpose of attending conferences or meetings in a passive capacity, with the exception of trainees as described below. However, a company may pay reasonable reimbursement (of travel and meals) for an investigator to present research findings at a meeting if the company funds the research. ... For CME-certified activities, reimbursement for travel, lodging, honoraria or personal expenses may not come directly from Industry. U of Penn SOM Office of CME may use funds from the educational grant to reimburse these expenses only for bona fide faculty, employees and volunteers of the provider, joint sponsor, or educational partner.”

University of Pittsburgh School of Medicine

Industry Sponsored Meetings/Industry Support for Off-Campus Meetings:

“SOHS faculty, personnel, or students or UPMC providers or staff may participate in or attend Industry-sponsored meetings, or other off-campus meetings where Industry support is provided, so long as: (a) the activity is designed to promote evidence-based clinical care and/or advance scientific research; (b) the financial support of Industry is prominently disclosed; (c) if the SOHS/UPMC representative is an attendee, Industry does not pay attendees’ travel and attendance expenses; (d) attendees do not receive gifts or other compensation for attendance; (e) meals provided are modest (i.e., the value of which is comparable to the Standard Meal Allowance as specified by the United States Internal Revenue Service) and consistent with the educational or scientific purpose of the event. In addition, if a SOHS/UPMC representative is participating as a speaker: (a) all lecture content is determined by the SOHS/UPMC speaker and reflects a balanced assessment of the current science and treatment options, and the speaker makes clear that the views expressed are the views of the speaker and not the SOHS or UPMC; (b) compensation is reasonable and limited to reimbursement of reasonable travel expenses and a modest honorarium not to exceed \$2,500 per event.”

Speakers Bureaus:

“While one of the most common ways for the SOHS and UPMC to disseminate new knowledge is through lectures, ‘speakers bureaus’ sponsored by Industry may serve as little more than an extension of the marketing department of the companies that support the programming. Before committing to being a speaker at an Industry-sponsored event, careful consideration should be given to determine whether the event meets the criteria set forth in Section 6 of this policy, relating to Industry Sponsored Meetings. SOHS or UPMC personnel may not participate in, or receive compensation for, talks given through a speakers bureau or similar frequent speaker arrangements if: (a) the events do not meet the criteria of Section 6; **or** (b) if the content of the lectures given is provided by Industry or is subject to **any** form of prior approval by either representatives of Industry or event planners contracted by Industry; **or** (c) the content of the presentation is not based on the best available scientific evidence; **or** (d) the company selects the individuals who may attend or provides any honorarium or gifts to the attendees.”

“Speaking Relationships with company or company event planners are subject to review and approval of the participant’s administrator, department chair, or dean as delineated in Section 2, Consulting Relationships.”

Consulting Relationships:

“The SOHS and UPMC recognize the obligation to make the special knowledge and intellectual competence of its faculty members available to government, business, labor, and civic organizations, as well as the potential value to the faculty member, the University, and UPMC.

However, consulting arrangements that simply pay SOHS or UPMC personnel a guaranteed amount without any associated duties (such as participation on scientific advisory boards that do not regularly meet and provide scientific advice) shall be considered gifts and are consequently prohibited.

In order to avoid gifts disguised as consulting contracts, where SOHS or UPMC personnel have been engaged by Industry to provide consulting services, the consulting contract must provide specific tasks and deliverables, with payment commensurate with the tasks assigned. All such arrangements between individuals or units and outside commercial interests must be reviewed and approved prior to initiation in accordance with appropriate University or UPMC policies.

For SOHS personnel, consulting relationships with Industry may be entered into only with the prior permission of a faculty member’s dean, department chair (in the case of the SOHS faculty), or administrator. In addition, prior review and written approval from the faculty member’s dean is required if consulting relationships with any one company (including the parent and subsidiary companies) will pay the faculty member in excess of \$10,000 in any twelve-month period. For employees of UPMC who are not faculty, prior written approval of the appropriate supervisor within UPMC is required for any outside consulting. The SOHS and UPMC reserve the right to require faculty and employees to request changes in the terms of their consulting agreements to bring those consulting agreements into compliance with SOHS and/or UPMC policies.”

Vanderbilt University School of Medicine

“VUMC personnel may not accept compensation from industry, including the defraying of costs, for simply attending a CME or other activity (i.e. if the individual is not speaking or otherwise actively participating at the event).

Consulting arrangements that pay VUMC personnel a guaranteed amount without any associated duties (e.g. scientific advisory boards that do not meet regularly and provide scientific advice) shall be considered gifts and are consequently prohibited.

These guidelines are not meant to discourage constructive scholarly interchange between Vanderbilt personnel and industrial research and development efforts. However, while pursuing such activities, VUMC personnel must follow University guidelines relating to consulting and may accept only fair market compensation for specific, legitimate services provided to industry with payment commensurate with time and effort.

1. The terms of the arrangements, services provided, and compensation must be set forth in writing.
2. If one consulting relationship will pay the individual in excess of \$10,000 in any 12 month period, prior review and written approval must be received from the department chair (for faculty

and academic departmental staff), appropriate Associate Dean (for students, residents, fellows, or post-doctoral fellows), or the appropriate CEO/ CEO's designee (for medical center staff) .

3. All consulting relationships must be reported by faculty and staff using the appropriate annual COI disclosure tool.

VUMC personnel may not participate in or receive compensation for talks supported directly by industry if either: (a) the selection of speaker, topic, and/or audience is determined by an entity which provides speakers only for events supported or sponsored by industry, **or** (b) the content of the lectures given is subject to **any** form of prior review or approval by either representatives of industry or event planners contracted by industry, **or** (c) the content of the presentation is not based on a balanced review of the best available scientific evidence. In essence, the lecturer is expected to determine the lecture's content, including slides and written material, and to provide a balanced assessment of therapeutic options. This item does not restrict the opportunity for VUMC personnel to discuss their own scholarship as consultants at company sponsored meetings and to accept meals at such times."

Yale University School of Medicine

"A YMG physician may accept only fair market compensation for specific, legitimate services provided by him or her to the pharmaceutical company. Payment must be commensurate with time and effort. The terms of the arrangements, services provided, and compensation must be set forth in writing;...."

"YMG physicians who are simply attending a CME or other instructional activity and are not speaking or otherwise actively participating or presenting at the meeting, should not accept compensation from companies either for attending or defraying costs related to attending the meeting;...."

"Clinical meetings and scientific meetings sponsored by professional societies frequently derive a portion of their support from industry. Such sponsorship may give rise to inappropriate industry influence on the content of the conference or its attendees. Grants for meetings and conferences that originate from the company's marketing division maybe particularly problematic. Industry sponsorship generally takes one of two general forms and different standards apply in each case.

1. First, industry may partially sponsor meetings run by professional societies. YMG physicians are expected to participate in meetings of professional societies as part of their CME and professional obligations. Nonetheless, faculty should be aware of the potential influence of industry on these meetings and attentive to the guidelines set forth below in evaluating whether and how to attend or participate in these meetings.
2. A second type of meeting is fully sponsored by industry. The following guidelines apply in that case. These guidelines apply to all lectures, meetings, and related publications sponsored directly by industry or by intermediate educational companies subsidized by industry. YMG physicians should actively participate (*e.g.*, by giving a lecture, organizing the meeting) in such meetings or lectures only if:
 - a. Financial support by industry is fully disclosed at the meeting by the sponsor;
 - b. The meeting or lecture's content, including slides and written materials, are determined by the YMG physician;
 - c. The lecturer is expected to provide a balanced assessment of therapeutic options and should promote objective scientific and educational activities and discourse;

- d. The YMG physician is not required by the company sponsor to accept advice or services concerning teachers, authors, or other educational matters including content as a condition of the sponsor's contribution of funds or services;
- e. Attendees in the audience are not compensated or otherwise materially rewarded for attendance (*e.g.*, through payment of travel expenses, or provision of food or gifts)
- f. Gifts of any type are not distributed to attendees or participants before, during, or after the meeting or lecture;
- g. The YMG physician receives compensation *only* for the services provided and the compensation is reasonable;
- h. Time spent in preparing and delivering the lectures does not impair the YMG physician's ability to fulfill Departmental responsibilities;
- i. The lecturer explicitly describes all his or her related financial interests (past, existing, or planned) to the audience;
- j. The lecturer makes clear to the audience that the content of the lecture reflects the views of the lecturer and not Yale Medical Group or Yale School of Medicine; and
- k. YMG physicians should not facilitate the participation of Yale trainees in industry-sponsored events that fail to comply with these standards.”

F. Industry-Sponsored Scholarships and Other Educational Funds for Trainees

Boston University School of Medicine

“Clinicians should ensure that support of educational programs for trainees by the pharmaceutical or device industries is free of any actual or perceived conflict of interest. These funding mechanisms may include grants for educational initiatives, scholarships, reimbursement of travel expenses, or other non-research funding in support of scholarship or training. Specifically, the industry funding must comply with all of the following:

1. The trainee is selected by the Department, Program, or Section.
2. The funds are provided to the BMC or BUSM development offices, or, in the case of CME-accredited activities, to the CME office.
3. The Department, Program, or Section has determined that the conference or training has educational merit.
4. The recipient of the funds is not subject to any implicit or explicit *quid pro quo* (i.e., ‘no strings are attached’).”

Mount Sinai School of Medicine

Vendor Support for Trainees:

“Vendor support can never be made directly to or earmarked specifically for an identified individual. Vendor support for trainee education, including salary support, must be in the form of educational grants to Mount Sinai.”

Vendor Support to Participate in Events:

“Mount Sinai faculty, staff and trainees may not accept scholarships or other special funding directly from a vendor. Vendors may make donations a general departmental education fund; the department will use its own criteria to select trainees to receive support for participation in educational events. Under no circumstances can a trainee be paid by a commercial sponsor to attend an educational event.”

Stanford University School of Medicine

1. “Industry support of students and trainees should be free of any actual or perceived conflict of interest, must be specifically for the purpose of education and must comply with all of the following provisions:
 - a. The School of Medicine department, program or division selects the student or trainee.
 - b. The funds are provided to the department, program, or division and not directly to student or trainee.
 - c. The department, program or division has determined that the funded conference or program has educational merit.
 - d. The recipient is not subject to any implicit or explicit expectation of providing something in return for the support, i.e., a ‘quid pro quo.’
2. This provision may not apply to national or regional merit-based awards, which are considered on a case-by-case basis.”

University of California, Los Angeles David Geffen School of Medicine

“Industry support of students and trainees should be free of any actual or perceived direct benefit to the company providing the funds. Funds must be provided to an academic unit of the School of Medicine specifically for the purpose of education and must comply with all of the following provisions:

1. The School of Medicine department, program or division must oversee the activity to be funded, and certify that the funded activity enhances the goals of the training program.
2. The School of Medicine department, program or division must have sole discretion to determine how the funds are to be used. If the funds are intended to support educational activities or professional expenses of a trainee or trainees, the department, program, or division should have total discretion in deciding which students or trainees receive support.

These provisions do not apply to educational programs for trainees at national or professional society meetings, awards, or travel grants presented by professional societies, where outside organizations take responsibility for ensuring that the activities are free of commercial influence.”

University of California, San Francisco School of Medicine

1. “Industry support for students and trainees participation in education programs must be free of any real or perceived conflict of interest. All educational grants or support of educational programs must be specifically for the purposes of education and must comply with the following requirements:
 - a. The School of Medicine Department, Program or Division must select the student(s) or trainee(s) for participation.
 - b. The funds must be provided to the Department, Program or Division and not directly to the student or trainee.
 - c. The Department, Program or Division determines that the education conference or program has educational merit.
 - d. There is no implicit or explicit expectation that the participant must provide something in return for participation in the educational program.
2. This provision does not apply to regional, national or international merit-based awards which will be considered on a case-by-case basis.”

University of Cincinnati College of Medicine

“Industry support for Unique Educational or Training Opportunities must be specifically for the purpose of education and must comply with all of the following provisions:

1. The student or trainee to receive such support must not be selected by the industry providing the support.
2. The funds are approved by the department, program, or division responsible for the student or trainee;
3. The department, program or division has determined that the funded conference or program has educational merit; and
4. The recipient is not subject to any implicit or explicit expectation of providing something in return for the support, i.e., a *quid pro quo*.’
5. The name of the College of Medicine or the attendee’s affiliation with the College of Medicine may not be used to imply endorsement of a product or service by the College.”

University of Massachusetts School of Medicine

“Clinical Vendor support for scholarships or discretionary funds to support trainee or resident travel or non-research funding support may be accepted provided that all of the following conditions are met:

1. Clinical Vendor support for scholarships and fellowships must comply with UMMMC and UMMMG policy requirements for such funds, including the execution of an approved budget and written gift agreement through the UMass Memorial Foundation, and maintenance of the funds in an appropriate restricted account, overseen by the department chair. Selection of recipients of

scholarships or fellowships must be within the sole discretion of department chair or, in the case of graduate medical education, the associate dean for graduate medical education.

2. Clinical Vendor support for other trainee activities, including travel expenses or attendance fees at conferences, must be accompanied by a written gift agreement through the UMass Memorial Foundation, maintained in an appropriate account overseen by the respective department chair. Selection of recipients and specific expenses to be supported must be within the sole discretion of the clinical department. All activities for which Clinical Vendor support is used should have legitimate educational merit and associated expenses should be reasonable and consistent with UMass Memorial policies.”

University of Pennsylvania School of Medicine

“In the case of Professionals-in-training or other trainees, conference funds may be donated to a clinical department/division, provided that department faculty (and not the company) chooses the trainee to receive the funds for attending the meeting. For CME-certified activities, reimbursement for travel, lodging, honoraria or personal expenses may not come directly from industry.”

University of Pittsburgh School of Medicine

“The SOHS and UPMC may accept Industry support for scholarships or discretionary funds to support trainee or resident travel or non-research funding support, provided that all of the following conditions are met:

1. Industry support for scholarships and fellowships must comply with all University or UPMC requirements for such funds, including the execution of an approved budget and written gift agreement through the Medical and Health Sciences Foundation, and be maintained in an appropriate restricted account, managed at the school or department as determined by the senior vice chancellor for the health sciences. Selection of recipients of scholarships or fellowships will be completely within the sole discretion of the school in which the student or trainee is enrolled or, in the case of graduate medical education, the associate dean for graduate medical education. Written documentation of the selection process will be maintained.
2. Industry support for other trainee activities, including travel expenses or attendance fees at conferences, must be accompanied by an appropriate written agreement and may be accepted only into a common pool of discretionary funds, which shall be maintained under the direction of the dean or department (as specified in the funding agreement) for the relevant school. Industry may not earmark contributions to fund specific recipients or to support specific expenses. Departments or divisions may apply to use monies from this pool to pay for reasonable travel and tuition expenses for residents, students, or other trainees to attend conferences or training that have legitimate educational merit. Attendees must be selected by the department based upon merit and/or financial need, with documentation of the selection process provided with the request. Approval of particular requests shall be at the discretion of the dean.”

Vanderbilt University School of Medicine

“Provision of funds to VUMC personnel from industry sources (i.e., scholarships, reimbursement of travel expenses, or other non-research funding in support of scholarship or training) must be free of any actual or perceived conflict of interest, whether the funds are provided directly to Vanderbilt or indirectly through industry grants to professional organizations.

1. Industry may not earmark contributions to fund specific recipients or to support specific expenses.
2. The funds must be provided to the department or the sponsoring professional organization rather than directly to the trainee.
3. The VUMC personnel must be selected according to clear criteria.
4. The department must determine that the conference or training has educational merit.
5. The recipient of the funds must not be subject to any implicit or explicit *quid pro quo*.”

Yale University School of Medicine

“YMG physicians should ensure that support of Yale clinical trainees by the pharmaceutical industry through funding mechanisms such as scholarships, reimbursement of travel expenses, or other non-research funding in support of scholarship or training are free of any actual or perceived conflict of interest. Industry funding of trainees should comply with all of the following:

1. The trainee is selected by the Yale School of Medicine Department, Program, or Section;
2. The funds are provided to the Department rather than directly to the trainee;
3. The Department, Section or Program have determined that the conference or training has educational merit; and
4. The recipient of the funds is not subject to any implicit or explicit *quid pro quo* (i.e., ‘no strings are attached’).

This guideline is not intended to preclude industry support for YMG physicians to travel to evaluate major clinical equipment for prospective acquisition by the School.”

G. Food (See also Gifts)

Boston University School of Medicine

“Meals directly or indirectly funded by industry may not be provided at BUMC or on the BUSM campus. In addition, clinicians should use discretion in participating in industry-sponsored meals off campus. Specifically, FPP physicians should not facilitate the attendance of trainees at meals off campus sponsored by industry or at educational events off campus sponsored by industry which are not accredited by the Accreditation Council for Continuing Medical Education (‘ACCME’) or the American Dental Association Continuing Education Dental Recognition Program (‘ADA CERP’).”

Mount Sinai School of Medicine

“Direct provision by vendors of food and beverages, or subsidies for food and beverages, is prohibited.”

Stanford University School of Medicine

“Meals or other types of food **directly** funded by industry may not be provided at Stanford School of Medicine, Stanford Hospital and Clinics, the Lucile Packard Children’s Hospital, or the Menlo Clinic.”

University of California, Los Angeles David Geffen School of Medicine

“Industry representatives may not directly provide meals or other types of food for any educational or professional activity of the School of Medicine, anywhere on the UCLA campus or at any facility operated by the Medical Enterprise. Faculty, staff, and trainees are strongly encouraged not to accept such meals at any location under any circumstances.”

University of California, San Francisco School of Medicine

“Meals and other gifts or donations funded directly by industry may not be provided at any UCSF School of Medicine location.”

University of Cincinnati College of Medicine

“Meals or other types of food and beverages directly funded by Industry may not be provided at educational events sponsored by or accredited by the University of Cincinnati College of Medicine.”

University of Massachusetts School of Medicine

“Clinical Personnel are prohibited from accepting gifts of any kind from any Clinical Vendor.

The only exceptions include:

1. Meals provided as part of UMass Memorial/UMass Medical School CME events sponsored by Clinical Vendors. Funds provided by Clinical Vendors for CME events, and processed through the UMMM Foundation consistent with Section (B)¹³ below, may be used to support the reasonable and appropriate costs of the CME event, including food; and,
2. Meals provided as part of national CME events (which may be funded, provided directly or offered by Clinical Vendors).”

University of Michigan Medical School

“Food or drink may not be provided directly by vendors.”

¹³ Internal references within certain policies have been included to permit further review of policy provisions.

University of Pennsylvania School of Medicine

“Meals must be accompanied by a legitimate educational program.”

University of Pittsburgh School of Medicine

“Meals or other hospitality funded directly by Industry may not be offered in any facility owned and operated by the SOHS or UPMC.

SOHS and UPMC personnel may not accept meals or other hospitality funded by Industry, whether on-campus or off-campus. ... Modest meals provided incidental to attendance at an off-campus event that complies with the provisions of subsection 6 [“Industry Sponsored Meetings or Industry Support for Off-Campus Meetings”], below, may be accepted.”

University of Toledo College of Medicine

“Lunches, snacks, and other food or drink at routine or unscheduled HSC grand rounds, conferences and other meetings may be supported by industry representatives only if:

1. The event is either Continuing Medical Education (CME) approved or an officially sponsored departmental educational event; and
2. There is no drug or device promotional association with the event; and
3. The industry that wishes to sponsor the activity provides an educational grant to be used at the discretion of the CME office or department.”

Vanderbilt University School of Medicine

“VUMC personnel may not accept meals or other hospitality funded directly by industry, whether on campus or off campus. Meals offered at national meetings (or at associated satellite symposia approved by meeting organizers) may be accepted so long as the activity linked to the meal is educational, scientific, or consultative, and not marketing. With the exception of grants specifically provided in support of CME activities (see Section II.A.), departments chairs, division chiefs, center directors, and institute directors may elect to apply funds accepted through the VUMC Development Office as unrestricted gifts towards meals and refreshments at on-campus regularly scheduled meetings which are in the furtherance of the operational unit’s missions (see Section II.C.). ”

Yale University School of Medicine

“Meals funded by industry should not be provided on the YSM campus. In addition, Yale faculty and trainees should use discretion in participating in industry-sponsored meals off campus;....”

H. Professional Travel (See also Participation in Industry-Sponsored Programs, Speakers Bureaus, and Consulting)

Boston University School of Medicine

“Clinicians may only accept support from industry for travel and related expenses to review a vendor’s products under circumstances that do not create an actual or perceived conflict of interest and are compliant with BU policy (<http://www.bu.edu/policies/gift/policy.html>).”

University of Louisville School of Medicine

“Travel funds may not be directly given to any UofL faculty, residents, or students, except in the cases of legitimate reimbursement or contractual services to those Vendors. Travel funds for educational purposes must be otherwise handled per Section 4 [“Educational Grants”].”

I. Ghostwriting

Mount Sinai School of Medicine

“Authorship on articles and scientific presentations must be in accordance with [Mount Sinai's Responsibilities of Authors](#) and [AMA guidelines on authorship](#). An author's role in content and contributions must be verifiable. Having one's own name appear as author of a document conceived, researched and written by others is unacceptable, e.g. an article prepared by industry for publication under an MSSM faculty member's name is not permitted.”

Stanford University School of Medicine

“Individuals are prohibited from publishing articles under their own names that are written in whole or material part by industry employees.”

University of California, San Francisco School of Medicine

“Faculty and staff are prohibited from publishing articles that are substantially or completely ‘ghost’ written by industry representatives. Faculty and staff who publish articles with industry representatives must participate in the preparation of the manuscript in a meaningful way to include interpretation of data and/or the writing of the manuscript and shall be listed as authors or otherwise appropriately cited for their contribution. The financial interests of all authors shall be listed in accordance with the standards of the journal.”

University of Louisville School of Medicine

“**UofL faculty, residents, or students are prohibited from engaging in any form of ‘ghostwriting’** of any presentations, publications, or other forms of media product (i.e., the provision of materials by a Vendor or intermediary that is officially credited to someone other than the writer(s) of the material).”

University of Massachusetts School of Medicine

“Clinical Personnel writing on behalf of UMass Memorial, or using its name, are prohibited from publishing articles or editorials written by Clinical Vendor employees. Clinical Personnel should always be responsible for the content of any papers or talks that they give, including the content of slides.”

University of Pittsburgh School of Medicine

“Under no circumstances may SOHS and/or UPMC personnel be listed as co-authors on papers ghostwritten by Industry representatives. In addition, SOHS and/or UPMC personnel should always be responsible for the content of any papers or talks that they give, including the content of slides.”

J. Purchasing

Boston University School of Medicine

“Clinicians who are involved in institutional decisions concerning the purchase of or approval of medications or equipment, or the negotiation of other contractual relationships with industry must not have any financial interest (e.g., equity ownership, compensated positions on advisory boards, a paid consultancy or other forms of compensated relationship) in the vendor that might benefit from the institutional decision. This provision is not intended to preclude a clinician's indirect ownership, through mutual funds or other investment vehicles, of equities in publicly traded companies.”

“Clinicians must disclose their actual and potential conflicts of interest related to any institutional deliberations and generally may not participate in deliberations in which he or she has an actual or potential conflict of interest. See Boston Medical Center Vendor Relations Policy (No. 9.16); Boston Medical Center Conflict of Interest Policy (No. 9.4); Boston University Conflict of Interest Policy (<http://www.bu.edu/ethics/conflict.pdf>).”

Mount Sinai School of Medicine

“All purchasing decisions must be made in a manner consistent with Mount Sinai's [Purchasing Policy](#) in order to promote the best interests of Mount Sinai.”

Disclosure of Financial Interests:

“Mount Sinai faculty and staff involved in decisions regarding the purchase of equipment or supplies - including individuals who serve on formulary committees - must submit an annual conflict of interest disclosure form identifying any financial interests that they have with vendors or potential vendors. Anyone with a conflict of interest may not participate in discussions and decisions on:

1. Purchases from a company in which they have a financial interest
2. Purchase of products of a competitor of the company in which they have a financial interest”

Site Visits to View Vendor Products and/or Services:

“Site visits to observe vendor products and/or services are sometimes an appropriate part of a purchasing decision. When such visits are necessary, they must be approved by the department head. Vendor offers to pay for site visits cannot be accepted because these offers may be designed to influence a purchasing decision or the institution's relationship with other vendors; the cost of the trip should be paid with departmental funds.”

Pharmacy and Therapeutics Committee:

“The Pharmacy and Therapeutics Committee policy manual includes standards and procedures for introducing new agents to the formulary. All requests to the committee for the addition of a drug, vaccine or other biological agent require that the requestor complete and submit a conflict of interest disclosure form.”

Consulting/Relationships with Outside Entities:

“Faculty and staff with decision-making authority for procuring specific products or services for Mount Sinai may not have an outside business relationship with a company that provides those products or services to the institution.”

Stanford University School of Medicine

“Individuals having a direct role making institutional decisions on equipment or drug procurement must disclose to the purchasing unit, prior to making any such decision, any financial interest they or their immediate family have in companies that might substantially benefit from the decision. Such financial interests could include equity ownership, compensated positions on advisory boards, a paid consultancy, or other forms of compensated relationship. They must also disclose any research or educational interest they or their department have that might substantially benefit from the decision. The purchasing unit will decide whether the individual must recuse him/herself from the purchasing decision.

1. This provision excludes indirect ownership such as stock held through mutual funds
2. The term ‘immediate family’ includes the individual’s spouse or domestic partner or dependent children.”

University of California, Davis School of Medicine

“Hospital and medical group formulary committees and other committees overseeing purchases of medical devices, nutritional products or other products or services that are provided upon prescription or suggestion of a health care professional, will follow the Political Reform Act regulations, which include restrictions on the participation of individuals who have financial relationships with vendors affected by the purchase decisions.”

University of California, Los Angeles David Geffen School of Medicine

“Faculty or staff having any personal financial interest or indirect financial interest as defined by University policy, or whose spouses, registered domestic partners, or dependent children having such interests, in companies that might substantially benefit from the decisions made within their University duties must refrain from participating in or influencing these decisions under the provisions of the California Political Reform Act. This does not apply to financial interests in investment funds where the individual does not have separate and direct control over the investment in the company. Provisions of the act may be viewed at <http://www.ucop.edu/ogc/coi/info.html>.”

University of California, San Francisco School of Medicine

“Faculty or staff who serve as consultants, members of a speakers’ bureau, have an equity interest in or another relationship with industry for which they receive personal compensation or other support must recuse themselves from deliberations or decision making regarding the selection of products or services to be provided to the Medical Center or School of Medicine (eg; selection of drugs to be added to the formulary) by the company. Faculty with such ties to industry shall not participate in decisions regarding the purchase of related items, drugs, procedures in their department unless specifically requested to do so by the purchasing unit and after full disclosure of the faculty member’s industry relationship. Under all circumstances the financial relationship must be disclosed and any conflict resolved prior to participation in any decision making.”

University of Massachusetts School of Medicine

“Clinical Personnel with any financial relationship with a Clinical Vendor may not be a member of the Pharmacy and Therapeutics Committee or any subcommittees or any clinical device procurement committee of UMMMC or UMMMG. Financial relationships include:

1. Consulting or other contractual arrangements
2. Clinical research sponsorship – where the faculty member is the Principal or Co-principal Investigator
3. Any outside business arrangements with any clinical vendor, including:

- a. Direct business arrangements (joint venture or other support not described above)
- b. Loans, leases/rental arrangements
- c. Investment relationships (unless held in mutual, pension or other similar investment fund over which the individual exercises no asset management control)

Individuals with the above financial relationships may continue to serve in an ad-hoc, advisory capacity (without vote) for content expertise at the request of such committees.”

University of Pennsylvania School of Medicine

“Professionals and other staff who participate in decision-making roles regarding the selection of pharmaceuticals, devices and other purchases by HUP and CPUP must not have conflicts of interest. Professionals and other staff members who are consultants but not decision-makers in these processes must actively disclose their significant financial or other relationships with the Industry entity that provides the product and its competitors prior to the Professional or other staff member’s participation in the selection process.”

Yale University School of Medicine

“YMG physicians who are involved in institutional decisions concerning the purchase of or approval of medications or equipment, or the negotiation of other contractual relationships with industry must not have any financial interest (e.g., equity ownership, compensated positions on advisory boards, a paid consultancy or other forms of compensated relationship) in pharmaceutical companies that might benefit from the institutional decision. This provision is not intended to preclude the indirect ownership, through mutual funds or other investment vehicles, of equities in publicly traded pharmaceutical companies by Yale faculty;....”

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