

Policy and Guidelines for Interactions between the University of Vermont College of Medicine (“College”) and the Pharmaceutical, Biotechnology, Medical Device, and Hospital and Research Equipment and Supplies Industries (“Industry”)

Purpose of Policy:

The purpose of this policy is to establish guidelines for interactions with Industry representatives for faculty, staff, students, and trainees of the College. Interactions with Industry occur in a variety of contexts, including marketing of new pharmaceutical products, medical devices, and research equipment and supplies on-site, on-site training about newly purchased devices, the development of new devices, educational support of medical students and trainees, and continuing medical education. Faculty and trainees also interact with Industry off campus and in the preparation of scholarly publications. Many aspects of these interactions are positive and important for promoting the educational and research missions of the College. However, these interactions must be ethical and cannot create conflicts of interest that could endanger the integrity of our education and training programs, data integrity, patient safety, or the reputations of faculty members, staff members, students, trainees or the institution.

Statement of Policy:

It is the policy of the College that interaction with Industry should be conducted so as to avoid or minimize conflicts of interest. When conflicts of interest do arise they must be addressed appropriately, as described herein.

Scope of Policy:

This policy incorporates the following types of interactions with Industry. It is not intended to supersede or interfere with the application of existing College and University policies that govern sponsored faculty research and related activities.

- I. Gifts and compensation
- II. Site access by sales and marketing representatives
- III. Provision of scholarships and other educational funds to students and trainees
- IV. Support for educational and other professional activities
- V. Disclosure of relationships with Industry

I. Gifts and Compensation

A. Personal gifts of any kind from Industry may not be accepted anywhere at the College or in connection with any College activities or events. In addition, College faculty, staff,

students and trainees may not accept gifts at any clinical facilities such as hospitals, clinics and the like. This prohibition includes gifts of cash or cash equivalents. Meals or other food directly funded by Industry may not be accepted, solicited or provided, even if in conjunction with legitimate educational events, on any College property. Acceptance, solicitation or use of gifts of a promotional nature, regardless of value (e.g., pens, notepads, clothing, and educational materials containing names of companies, products, logos or other identification) is expressly prohibited by this policy. Offers of gifts of any kind that violate this policy must be reported to the Office of the Dean of the College.

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 Accreditation Council for Continuing Medical Education Standards for Integrity and Independence <https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce> and the AMA Statement on Gifts to Physicians from Industry <https://code-medical-ethics.ama-assn.org/ethics-opinions/gifts-physicians-industry>.

B. Individuals may not accept gifts or compensation for listening to sales talks by Industry representatives.

C. Individuals engaged in educational activities in patient-care settings may not accept gifts or compensation for prescribing or changing patients' prescriptions.

D. Individuals may not accept compensation from Industry, including the defraying of costs, for simply attending CME or other activities or conferences. If an individual is speaking or otherwise presenting at an event, see Section IV, Paragraph E.

II. Site Access by Sales and Marketing Representatives

A. 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. Sales and marketing representatives are required to wear visible and appropriate identification at all times.

B. Sales and marketing representatives are permitted in non-patient care areas by appointment only. Sales and marketing representatives are not permitted access to students on the campus of the College.

C. Appointments to obtain information about new drugs in the formulary will normally be issued by hospital pharmacies or by Pharmacy and Therapeutics Committees.

III. Provision of Scholarships and Other Educational Funds to Students and Trainees

A. Industry support of students and trainees should be free of any actual or perceived commercial bias, must be specifically for the purpose of education and must comply with all of the following provisions:

1. The College department, division or program selects the student or trainee.
2. The funds are provided to the College department, division or program and not directly to the student or trainee.
3. The College department, division or program has determined that the funded conference or program has educational merit.
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.”

B. This provision does not apply to national or regional merit-based awards, which are considered on a case-by-case basis.

IV. Support for Educational and Other Professional Activities

A. Individuals should be aware of the ACCME Standards for Integrity and Independence. They provide useful guidelines for evaluating all forms of Industry interaction, both on and off campus and including both University of Vermont-sponsored and other events. The Standards are appended to this policy and may be found at <https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce>.

B. All educational events sponsored by the College 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 or divisions and not by individual faculty members.
2. Departments and divisions must maintain records of compliance with the ACCME Standards.

C. Meals or other food directly funded by Industry may not be provided at the College.

D. Individuals should evaluate very carefully their own participation in meetings and conferences that are fully or partially supported by Industry because of the high potential for perceived or real commercial bias.

E. Individuals who organize or present at 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 meeting or lecture content is determined by the speaker and not the Industry supporter.
3. The presenter is expected to provide a fair and balanced assessment of diagnostic, therapeutic, or other clinical recommendations and to promote objective scientific and educational activities and discourse.
4. The College participant is not required by an Industry supporter to accept advice or services concerning speakers, content, etc., as a condition of the contribution of funds or services.
5. The presenter makes clear that content reflects individual views and not the views of the College.
6. Individuals should consider carefully whether it is advisable or appropriate to accept compensation directly from Industry for organizing or presenting at meetings and conferences.

V. Disclosure of Relationships with Industry

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

B. In scholarly publications, individuals must disclose their financial interests in accordance with the International Committee of Medical Journal Editors (www.icmje.org).

C. Faculty members with supervisory responsibilities for students, residents, trainees or staff should ensure that their conflicts or potential conflicts of interest do not affect or appear to affect their supervision of students, residents, trainees, or staff members.

D. Individuals having direct roles in making institutional decisions on equipment or drug procurement must disclose in advance to purchasing units any financial relationships they have with companies that might substantially benefit from their decisions. Such financial relationships could include equity ownership, compensated positions on advisory boards, paid consultancies or other forms of compensated relationship. They must also disclose any research or educational interest they or their departments have that might substantially benefit from their decisions. The purchasing units will decide whether individuals must recuse themselves from purchasing decisions.

1. This provision excludes indirect ownership such as stock held through mutual funds.

E. For disclosure requirements related to educational activities, including CME as well as on-site teaching and presenting to faculty, staff, students, and trainees, see the ACCME Standards for Integrity and Independence <https://www.accme.org/accreditation-rules/standards-for-integrity-independence-accredited-ce>.

Potential Conflicts of Policies: Under circumstances in which policies conflict, individuals are expected to follow the strictest of the applicable guidelines.

COM Policy 1019.doc [Updated 050824]