



Scope:

This policy covers all residents participating in graduate medical education programs (GME) through THMEP at Tucson Medical Center (TMC).

Policy:

While partnerships between industry and physicians may further mutual interests to improve clinical management of diseases and improve patient care, some relationships with vendors create potential conflicts of interest for health care providers. A conflict of interest occurs when reasonable observers could conclude that professional requirements of a physician's roles are or will be compromised due to the influence by a vendor through gifts or services unrelated to the benefit of patients. At times, the appearance of influence, even when not connected to a specific benefit to the physician, can create an atmosphere of doubt about the physician's motivations.

This policy addresses resident behavior and relationships with vendors in educational contexts, which may include clinical training sites. The purpose of the policy is to ensure that GME activities at THMEP and affiliated training are not compromised through vendor influence, either collectively or through interactions with individual residents and fellows. The goal of this policy is to support the professional trust and to promote the accountability of trainees, as assessed by their patients and colleagues. THMEP supports policies governing vendor practices and conflicts of interest, and all residents and fellows are expected to observe these policies.

The following descriptions of allowable and prohibited practices is not intended to be exhaustive, and any other interactions between residents and vendor representatives that have the appearance of compromising impartiality in clinical or academic practices are likewise discouraged.

Because residents train in different venues within and outside THMEP/TMC, it is possible that they will encounter conflicting policy statements on various aspects of vendor interactions and conflict of interest. Where a conflict exists between this policy and that of another organization, it is the overarching policy of THMEP that the stricter policy will apply to a given situation within that organization.

- **Pharmaceutical Samples**

The acceptance by a resident or fellow of free pharmaceutical samples for delivery to patients is not allowed except when approved explicitly by the medical director and pharmacy and therapeutics committee or equivalent at a clinical site and when reviewed with a supervising faculty physician. One example of an acceptable use would be in a THMEP sponsored clinical trial. Acceptance of pharmaceutical samples for self-use is strictly prohibited for all residents.

- **Vendor gifts**

"Gifts" refers to items of value given without explicit expectation of something in return. Gifts may also include outside meals at restaurants, promotional items, services such as transportation, invitations to participate in social events, promotional items, and business courtesies, meals and beverages, and "ghost-writing" of scholarly works on behalf of the resident. THMEP residents may not accept gifts, regardless of value, for themselves or on behalf of THMEP, individually or as a group, from any vendor or manufacturer of a health care product or from the representative of any such vendor or manufacturer.

- **Vendor Sponsorship of Educational Activities**



Vendor sponsorship of GME educational activities should take place under unrestricted grants and gifts only. An unrestricted grant or gift is one that is given to THMEP in which the donor(s) have specifically identified their intent to support certain activities (such as education for residents). In instances where the grant is for GME educational use, the donor may not specify content, topic, or speaker. However, the grant may specify whether or not the purchase of food for a conference is allowed. Industry sponsorship for educational activities is permitted if and only if *all* of the following conditions are met:

- The donation is limited to direct support of the educational activity (e.g. a/v, honoraria, printing costs, space rental, etc.)
 - The donation is made for general educational purposes.
 - No individual is designated by the vendor as the recipient of funds for travel, meeting registration, or housing.
 - No industry representative may participate in or market at on- or off-site educational events.
 - Sponsorship is in compliance with ACCME and ArMA CME standards.
 - No food or other refreshments, gifts, free samples, books, or promotional materials with the manufacturer, drug, or device name imprinted are available at educational events.
 - Vendors may be acknowledged in a sign at the event, website acknowledgement, or in the written program.
- **Vendor Training**

Vendors may appropriately orient, train, and advise residents on the proper use or calibration of a product that has already been acquired by a particular institution. In such cases, the vendor is present as a consultant and must solely advise on the specific device and should not be allowed to market other products. Supervising faculty physicians must ensure that vendor involvement in any clinical activities is disclosed to patients/surrogates verbally and in writing and patients/surrogates must assent. Vendors must be identified as such so that they are not mistaken for clinicians.

Vendors may sponsor resident and fellow training on equipment already in use at a THMEP/TMC or affiliated institution.
 - **Participation in Industry-Sponsored Programs**

Residents may not participate as paid presenters or speakers in industry-sponsored programs such as lectures and panels without express written permission of the program director. Residents and fellows participating in such activity must report for duty hour purposes the actual time spent in the activity, and must also disclose to the program director the amount of any compensation offered, including non-monetary items.
 - **Industry-Sponsored Scholarships**

Vendor-provided funds for resident scholarships must be directed to a central fund within THMEP and should not designate an individual resident as recipient. Corporate contributions to underwrite resident are likewise prohibited unless directed to a central fund and not designated for the use of any individual resident.
 - **Program Monitoring of Resident-Vendor Representative Interactions**

Program leadership should be aware of and discuss with residents any interaction with representatives from vendors to ensure that any contacts are within the scope and spirit of this policy. Interactions that appear to place the resident in a position of obligation to or influence by, the vendor, should be explicitly discouraged.



**TMC Health Medical
Education Program**

Institutional Policy on Vendor Interaction

Programs should provide training to residents on vendor relations and conflicts of interest, including reference to this policy and other relevant institutional policies. Program directors are encouraged to include assessment of vendor interactions as part of the semi-annual review process, and require documentation of vendor interactions in resident/fellow portfolios. Programs should correct actions as needed to ensure that the policies described here are observed.