

Southern Illinois University School of Medicine

Policies on Industry Relations

Appropriate interactions between the SIU School of Medicine (SIU-SOM) and industry can help advance the School's mission. But improper industry influence can reduce the quality of patient care, research, and education, while increasing the cost of health care and eroding public trust in science and medicine. To ensure that the interactions of SIU-SOM employees, students, and trainees with industry meet high professional standards, the following policies are established.

SIU-SOM acknowledges the leadership of the Association of American Medical Colleges (AAMC) regarding industry relations policies. Unless noted, the policies listed here are taken from the AAMC policy recommendations outlined in the June 2008 report, *Industry Funding of Medical Education: Report of an AAMC Task Force*.¹

POLICIES

Access by Pharmaceutical Representatives

To protect patients, patient care areas, and work schedules, access by pharmaceutical representatives to individual physicians should be restricted to non-patient care 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 personal supervision of a faculty member.

Industry representatives who wish to provide educational information on their products may do so by invitation in faculty-supervised structured group settings that provides the opportunity for interaction and critical evaluation. Highly-trained industry representatives with M.D., Ph.D., or Pharm.D. degrees would be best suited for transmitting such scientific information in these settings.

Access by Device Representatives

Access by device manufacturer representatives to patient care areas is permitted only when the representatives are appropriately credentialed 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 in SIU Clinics unless there has been prior disclosure to and consent by the patient, and then only to provide in-service training or assistance on devices or equipment.

Student and trainee interaction with representatives should occur only for educational purposes and only with personal faculty supervision.

Pharmaceutical Samples ²

The use of pharmaceutical samples is discouraged.

In special instances, samples of certain kinds of extremely expensive, otherwise unavailable, or single dose drugs or durable medical equipment may be permissible with prior institutional approval.

Free samples may not be used by clinicians or clinical staff, or given to their friends or family members.

Free samples may never be sold.

Samples must be stored, controlled and distributed under conditions specified by SIU HealthCare Prescription Sample Medication Policy.

Food ³

Industry representatives may not directly provide meals or other types of food for any educational or professional activity of the School of Medicine. Faculty, staff, and trainees are prohibited from accepting meals at any location under any circumstances as this would be considered a Gift. (see Gifts to Individuals below)

Gifts to Individuals *

Gifts of any value or type to SIU SOM employees, students, and trainees from industry representatives are prohibited. This prohibition extends to spouses and immediate family members. Some gifts of educational materials, however, may serve SIU-SOM's mission. Such gifts may be accepted by the institution if approved by the SIU SOM ethics officer.

Professional Travel *

Some gifts of travel expenses for meetings may serve SIU-SOM's mission. Such gifts, under state law, may be accepted from industry if approved by the SIU-SOM ethics officer.

Boards of Directors, Advisory Boards, and Consulting

SIU School of Medicine acknowledges the value of permitting SIU-SOM employees to interact appropriately with industry. Examples of appropriate interactions include employee participation on industry boards of directors and scientific advisory boards as well as services provided through professional services agreements and consulting contracts, provided such activities are conducted in full compliance with the policies of SIU SOM, and that compensation reflects the fair market value of the services provided. All proposed engagements must be approved in advance by the employee's department chair for academic departments or unit administrators in all other units of the SIU SOM.

Participation in Industry-Sponsored Programs

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, Southern Illinois University School of Medicine strongly discourages participation by its faculty and staff in industry-sponsored speakers' bureaus.

If faculty and staff choose to participate in industry-sponsored, FDA-regulated programs, they must meet the following conditions:

1. The Southern Illinois University School of Medicine requires full transparency and disclosure by faculty and staff when participating in such programs;
2. Any payments made to academic personnel must be at fair market value;
3. Faculty and staff may not permit industry representatives to provide, modify, veto or otherwise manipulate any content of the presentation; and *
4. Speaking relations with company or company event planners are subject to review and approval of the participant's department chair, or dean. (or his designee) *

Faculty, staff, students and trainees are prohibited from:

1. Attending non-ACCME (Accreditation Council for Continuing Medical Education) approved 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.

Ghostwriting

"Ghostwriting" is defined as the provision of written material that is officially credited to someone other than the writer(s) of the material. Transparent writing collaboration with attribution between academic and industry investigators, medical writers, and/or technical experts is not ghostwriting. The unacknowledged, undisclosed provision of content is not permitted under any circumstances. SIU School of Medicine prohibits physicians, trainees, and students from allowing their professional presentations of any kind, oral or written, to be ghostwritten by any party, industry or otherwise.

Purchasing *

SIU-SOM should continue to follow state purchasing guidelines at all levels.

SIU HealthCare should develop guidelines to address conflicts of interest in purchasing similar to the Association of American Medical Colleges' disclosure recommendations and consistent with guidelines of the School of Medicine.

Continuing Medical Education

Southern Illinois University School of Medicine should continue auditing CME programs to assure compliance with the standards of the Accreditation Council for Continuing Medical Education, including those with respect to content validation and meals.

Southern Illinois University School of Medicine should continue support for its 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.

Industry-Sponsored Scholarships and Other Educational Funds for Trainees

All scholarships or other educational funds from industry should be processed centrally through the administration of the School of Medicine;

No quid pro quo may be involved in any way; and

The evaluation and selection of individual recipients of such funds should be the sole responsibility of the School of Medicine or of a nonprofit granting entity, with no involvement by the donor industry.

Food policy approved by the Executive Committee and Dean and Provost on March 2, 2009. All other policies approved on January 12, 2009.

OVERSIGHT AND COMPLIANCE

Department chairs and unit administrators are responsible for overseeing compliance with the industry relations policies among faculty, staff, and learners assigned to their departments and units. The Dean and Provost (or designate) will monitor compliance at the institutional level. Noncompliance may be addressed through education and professional development; existing disciplinary policies and procedures may be utilized, as warranted.

¹ Policies displayed in this document, unless noted, are taken verbatim in whole or in part from *Industry Funding of Medical Education: Report of an AAMC Task Force*. Washington, DC: Association of American Medical Colleges; 2008. In some cases, the policies are tailored to better address SIU-SOM.

² Policy was developed by the SIU-SOM Task Force on Industry Relations, based on the pharmaceutical samples policy of the School's practice organization, SIU HealthCare, and a review of other institutions' policies. For an example, see *Yale University Policy on Conflict of Interest and Conflict of Commitment*. New Haven, CT: Yale University; 2004. From <http://www.yale.edu/provost/html/conflict.pdf> as of March 1, 2009.

³ Policy uses wording from *Draft Guidelines on Industry Activities for the David Geffen School of Medicine at UCLA and the UCLA Medical Enterprise*. Los Angeles, CA: University of California - Los Angeles; 2006. From <http://www.medsch.ucla.edu/public/faculty/FEC/Docs/guidelines/Draft-GuidelinesDispersed11-3.pdf> as of March 1, 2009.

* Policies prepared by the SIU-SOM Task Force on Industry Relations, 2008.