University of California, Riverside, School of Medicine

Institutional Policy

INTERACTIONS WITH VENDORS AND HEALTH CARE PRODUCT MANUFACTURES

PURPOSE
The purpose of this policy is to establish standards for interactions with health care product industry representatives. At times, these interactions may create conflicts of interest, improper influence on decision-making, or the appearance of impropriety. Industry activities such as the provision of gifts may affect health care provider behavior and decisions. This policy is meant to raise awareness among residents of the challenges to professionalism and to help them build critical evaluation skills that reinforce high individual standards, norms and behaviors.

POLICY

1. **Gifts to individuals**: Gifts from industry may not be accepted at any time. Examples of gifts include free drug samples, textbooks, equipment, meals, travel costs, or monetary payment.

2. **Clinical Areas**: Sales and marketing representatives from pharmaceutical industry are not permitted in clinical (patient care) areas. Device industry representatives are not permitted in clinical areas except to provide in-service training on devices and other equipment already purchased, to provide demonstrations that may be of benefit to patients where no purchase is required, or to provide necessary technical advice involving the use of devices or equipment. These kinds of appointments must be scheduled in advance. If necessary due to an urgent patient care situation or to assist with the device installation, no appointment is necessary.

3. **Non-Clinical Areas**: Sales and marketing representatives from industry are permitted in non-clinical areas by appointment only for the limited purpose of in-service training of personnel for equipment already purchased or for the evaluation of new equipment or pharmaceuticals for possible purchase or education.

4. **Scheduling Industry Representatives**: When an industry representative is scheduled to be on-site, the faculty member interested in the training or product evaluation or education is responsible for scheduling the representative and must ensure the following standards are met:
   - The industry representative is supervised while in the designated location and leaves after the particular purpose has been completed.
   - The industry representative may not be allowed access to sources of information distribution outside of the scheduled meeting time. This prohibits the release of electronic email addresses or other contact information.
   - It is the responsibility of the faculty member scheduling the industry representative to ensure he/she has the appropriate credentials to perform the education or training requested.
5. **Food:** With the exception of food provided in connection with ACCME- accredited programming and in compliance with the ACCME guidelines, industry may not provide food at any location where residents are trained.

6. **Students and Trainees:** Students and trainees should only be involved in programs with industry representatives for educational purposes and when such program is conducted under the supervision of a faculty member.

7. **Industry Sponsorship of Education of Trainees, Students, Residents, or Post-Doctoral Fellows:** Industry may provide financial support for the educational benefit of trainees, students, residents, or fellows provided such funds comply with the following requirements:
   - Such funds are held by a central authority within the department or division providing oversight to such trainee, student or resident;
   - The UCR department or division determines which individual receives the educational support and how such funds are to be expended.
   - There's no expectation of any quid pro quo or direct benefit being provided to the industry sponsor in return for its funding.

8. **Disclosure:** The residents are expected to make full disclosure concerning any industry relationships to their program director.

9. The residents are required to comply with this UCR policy as well as the policy of the institution where they are assigned.

*This policy was approved by the Graduate Medical Education Committee on July 18, 2012.*

[Signature]

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