NAME: VENDOR INTERACTION POLICY

Purpose:

To provide guidelines governing interactions between graduate medical trainees and pharmaceutical/nutritional/medical equipment representatives at St. Christopher’s Hospital for Children. This policy does not address interactions between these vendors and other non-GME trainee hospital personnel.

Definitions:

“Graduate Medical Trainee” (or “Trainee”) refers to any individual participating in a graduate medical education program at St. Christopher’s Hospital for Children.

“Industry” refers to any entity involved in the production or distribution of pharmaceutical agents, nutritional or other medical products and medical devices.

“Vendor” refers to any employee of a pharmaceutical, nutritional, medical device, or medical supply company.

Guidelines:

   a. The AMA guidelines represent the minimum restrictions on physician behavior.
   b. Where the SCHC Vendor Interaction Policy is more restrictive, it supersedes the AMA guidelines.

2. Vendors may provide food at an educational venue for Trainees only if the entire content of the presentation is presented by a faculty member or faculty-invited industry-noncompensated speaker. Vendors may not participate in ANY portion of the presentation.

3. Vendors may provide Trainees with reprints of journal articles or FDA-approved package inserts, but they may not present Trainees with branded promotional materials.
   a. An exception to this rule is made for vendors of medical devices used by both physicians and patients. Medical devices are often proprietary and unique, making it difficult to obtain information from other sources. Vendors may
distribute branded promotional and educational materials to Trainees that is targeted at both physicians and patients.

4. Trainee acceptance of ALL non-food gifts from Vendors is inappropriate.
   a. This includes, but is not limited to:
      i. Cash
      ii. Educational and clinical tools
         1. Textbooks
         2. Reference guides
         3. Medical supplies, such as stethoscopes, reflex hammers, etc…
      iii. Office supplies

5. Trainees may not accept samples of any product from Vendors for personal or family use.

6. Disclosures of faculty conflicts of interest must be made at ALL scheduled educational venues.
   a. This includes, but is not limited to:
      i. Grand Rounds
      ii. Noon Conference
      iii. Board Review lectures
      iv. Scheduled educational conferences
         1. This includes scheduled conferences and attending rounds on required and elective rotations.
   b. This disclosure should be included within the presentation itself; either included on a slide or spoken during the lecture
   c. The disclosure should include:
      i. Entities providing financial support to the faculty member
         1. This includes, but is not limited to the following
            a. Any financial interest by the speaker or a family member in producers of any products to be discussed
            b. Research grants and support
c. Participation on speakers’ bureaus or advisor boards or as a consultant

ii. Generic names of medications/nutritional products/devices that will be referenced in the presentation and are manufactured by one of the companies in (6.c.i) above.

7. Trainees may not accept funds directly from a Vendor or other industry representative for the purpose of subsidizing travel to conferences or meetings.
   a. As per the AMA guidelines, scholarship or other special funds to permit residents and fellows to attend carefully selected educational conferences may be permissible as long as the selection of residents or fellows who will receive the funds are made by the academic or training institution. Carefully selected educational conferences are generally defined as the major educational, scientific or policy-making meetings of national, regional or specialty medical associations.

8. Vendors may not page Trainees directly while in the hospital. All Vendor contact with Trainees must be arranged through the GME Office.

9. A curriculum should be developed to educate Trainees about the effects, risks, and benefits of interactions with Vendors.
   a. Per the ACGME guidelines, this curriculum should be developed taking into account the competencies as they relate to the outcomes project:
      i. Professionalism
         1. Understanding published guidelines regarding gift-giving to physicians.
      ii. Practice-Based Learning
         1. Learning activities through specific instructional activities how promotional activities can influence judgment in prescribing decisions and research
         2. Understanding the purpose, development, and application of drug formularies and clinical guidelines. Discussion should include such
issues as branding, generic drugs, off-label use, and use of free samples.

iii. Systems-Based Practice
1. Learning how to apply appropriate considerations of cost-benefit analysis as a component of prescribing practice
2. Advocating for patient rights within health care systems with attention to pharmaceutical costs.

iv. Interpersonal and Communication Skills
1. Discussing and reflecting on managing encounters with industry representatives.
2. Illustrating cases of how to handle patient requests for medication, particularly with regard to direct-to-consumer advertising of drugs, should be included in communication skills curricula

10. At times, Trainees may be invited to speak in the community at a venue sponsored by a Vendor. This is appropriate only if the Trainee plans, prepares, and delivers all of his/her presentation. These presentations must be focused on a specific topic and not purely the discussion of a pharmaceutical or nutritional product or medical device.
   a. If the above considerations are met, the Trainee may receive a reasonable honorarium for the presentation.
   b. Disclosure of this financial support must be made to the audience

11. While St. Christopher’s Hospital for Children can not restrict Trainee behavior out of the hospital, this policy recommends the following:
   a. Trainees should consider both the AMA guidelines on Gifts to Physicians from Industry and the St. Christopher’s Hospital for Children’s Graduate Medical Education Vendor Interaction Policy as a guide in their interactions with Vendors outside of the facility.
   b. Industry sponsored events should be focused on a pediatric topic, not on a pharmaceutical or nutritional product or medical device.
   c. Meals provided during these events should be of modest value
12. Trainees often model their interactions with Industry and Vendors based on observing faculty members’ behavior. Faculty members at St. Christopher’s for Children also should consider this policy a useful guide in their own interactions with Industry and Vendors.

(GMEC reviewed and approved 9.11.17)