PURPOSE

To provide an educational and patient care environment in the UT College of Medicine and the University Medical Center that minimizes conflicts of interest and is conducive to evidence-based learning, the promotion of high quality ethical research, and excellence of patient care.

POLICY

1. Pharmaceutical and medical device representatives are to be prohibited from having any non-faculty mentored interactions with students or residents. This and all other provisions in this policy will apply to all educational sites, except for the AHEC programs and private physician offices.
2. Gifts to UT students, residents, attending physicians, nurses and others by pharmaceutical and medical device representatives and other vendors will be prohibited throughout the University of Toledo Medical Center and anywhere on the Health Science Campus.
3. Pharmaceutical and medical device representatives and other vendors may provide approved patient education and patient support information to inpatient and outpatient nursing units, pharmacy, operating room and other relevant UMC units. Branding with product name is not acceptable, unless for patient support or education with that product.
4. Lunches, snacks, and other food or drink at routine or unscheduled HSC grand rounds, conferences and other meetings may be supported by industry representatives only if
   • The event is either Continuing Medical Education (CME) approved or an officially sponsored departmental educational event; and
   • There is no drug or device promotional association with the event; and
• The industry that wishes to sponsor the activity provides an educational grant to be used at the discretion of the CME office or department. Policy for symposia and conferences designed for post-graduate education are addressed separately in item 8 below.

5. Evidence-based medicine education and training for students and residents will include didactic presentations and interactive training that address issues of conflict of interest, professionalism, and ethics as they relate to pharmaceutical and device promotion to physicians, medical personnel and patients.

6. Pharmaceutical and device industry representatives are permitted to visit the UT-UMC, provided they register and conduct themselves in accordance with University of Toledo Medical Center policy number 20-44.

7. Provision and use of drug samples will continue to be governed by the University Medical Center Policy Ambulatory Policy VI. 6-03 Guidelines for Receiving, Dispensing, and Disposal of Drug Samples.

8. Industry support of symposia, conferences and other events designed for post-graduate physicians, nurses, physician assistants and other health professionals in Northwest Ohio and beyond, which are sponsored totally or in part by the UT Office of Continuing Medical Education or the Office of Continuing Nursing Education (CNE), will be encouraged. Sponsor support will be officially acknowledged. Booths, tables and displays to provide product information and discussion with industry representatives will continue to be permitted.

9. Pharmaceutical and medical device representatives will be required to take a two-hour UT-sponsored education class on relations between industry and UT students and residents.

PROCEDURE

1. When pharmaceutical and medical device representatives wish to have interactions with UT-COM/HSC students, residents or faculty, they must first make arrangements and schedule time with a member of the faculty to be present during this interaction. This requirement and all other provisions in this policy will apply not only at the University Medical Center, but also to all other educational sites, except for the AHEC programs and private physician offices. Failure to adhere to this requirement by industry representatives may result in sanctions, including rescinding of the privilege of visiting the UT-HSC campus.

2. Gifts to UT students, residents, attending physicians, nurses and others by pharmaceutical and medical device representatives and other vendors will be prohibited throughout the University of Toledo Medical Center and on the Health Science Campus. Included in the category of gifts are any items of value, specifically including, but not limited to textbooks, treatment handbooks, pens, notepads, clocks, and flash drives; and items of little or no monetary value left in the clinic that serve as free advertising or name-recognition reminders for the company, such as sticky notes, pads, calendars. Reprints of journal articles are not considered gifts.

   a. Educational gifts, such as handbooks or monographs may not be distributed directly by industry representatives to students, residents, or faculty.

   b. If industry wishes to provide support for educational materials to be provided to students, residents, or faculty, it must be done through an educational grant or donation to a department. The department will select the appropriate educational material and distribute as deemed appropriate by the department.
c. The sponsors of the grants that make the educational gift possible will be appropriately recognized and acknowledged by the departments at the time the gifts are distributed.

3. Patient education material and patient support information may be provided to inpatient and outpatient nursing units, pharmacy, operating room, and other relevant UMC units, providing they have had medical review for accuracy and fairness. Branding with product name is not acceptable, unless for patient support or education with that product. Branding with the company name (e.g. RamClone®) on any educational material is acceptable as it acknowledges the educational contribution of that company. The industry representative may not give any such materials as individual gifts to the staff, but to the manager of the unit to use and distribute as determined appropriate by them to enhance education and facilitate patient care.

4. If industry wishes to provide support that might include lunches, snacks, and other food or drink at educational events for UT students, residents, and faculty, it must be done through an educational grant or donation to be used at the discretion of the CME office or department. The event must be either CME-approved or an officially sponsored departmental educational event, and there may be no drug or device promotional association with the event. Industry representatives must work through the CME office or the office of the academic department chair to make arrangements for sponsorships of events.
   a. The grants other industry support may be used by departments at their discretion for speaker fees and other costs related to the educational event, including meals as the CME office or department see fit. However, the CME office and departments are not to become conduits for funds to support meals at educational events.
   b. The grant or other industry support will be appropriately recognized and acknowledged by the CME office and departments during the educational event.

5. Evidence-based medicine (EBM) education and training for students and residents will include didactic presentations and interactive training that address issues of conflict of interest, professionalism, and ethics as they relate to pharmaceutical and device promotion to physicians, medical personnel, and patients. The current challenge of motivating students to engage in EBM must be addressed through focus on the practical relevance of EBM in the clinical setting. Details of the education programs for students and residents will be developed by established curricular procedures.

6. There will be no change in the current policy that permits pharmaceutical and device industry representatives to visit the UT-UMC, provided they register and conduct themselves in accordance with University of Toledo Medical Center policy number 20-44, Pharmaceutical Representatives.

7. There will be no change in the current policy regarding the provision of drug samples. They will continue to be governed by the University Medical Center Policy Ambulatory Policy VI. 6-03, Guidelines for Receiving, Dispensing, and Disposal of Drug Samples.

8. Industry support of symposia, conferences and other events designed for post-graduate physicians, nurses, physician assistants and other health professionals in Northwest Ohio and beyond, which are sponsored by the UT Office of Continuing Medical Education or the Office of Continuing Nursing Education, are encouraged. Sponsor support will be officially acknowledged. Booths, tables and displays to provide product information will continue to be permitted. While gifts of value will not be permitted, product information, reprints, and token reminders such as pens or pads may be made available at these display areas. It is intended that this mechanism will continue to offer opportunities for pharmaceutical and
medical device representatives and other vendors to present and provide information about their products.

The CME and CNE offices will monitor adherence to the spirit and content of this policy at these events.

9. The University of Toledo College of Medicine, in collaboration with the College of Pharmacy, will develop a two-hour education class on relations between industry and UT students and residents, to be offered twice yearly. When this is developed, all current pharmaceutical and medical device representatives will be required to take this course within 6 months of the first offering of this class. Subsequently, new representatives will be required to take the course within 6 months of their first registering as an industry representative with the UT-UMC Pharmacy or starting any activity at the UT-UMC.

10. All College of Medicine medical students, residents and faculty are expected to adhere to the content and spirit of this policy.

11. This policy will be reviewed at 6 and 12 months after inception to assure that unintended consequences can be corrected.

Policies Superseded by This Policy:
None

Revision/Review Date:

Note: The printed copy of this policy may not be the most current version; therefore, please refer to the policy website (http://policies.meduoio.edu) and verify with the responsible agent that the most current policy has been posted.

Final Approval By: [Signature]