Conflict of Interest Policy for the University of Connecticut School of Medicine:

Interaction between Students and Faculty at the University of Connecticut School of Medicine and the Pharmaceutical, Commercial, Nutriceutical and Biomedical Industry

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Conflict of Interest Policy for the University of Connecticut School of Medicine: Interaction between Students and Faculty at the University of Connecticut School of Medicine and the Pharmaceutical, Commercial, Nutriceutical and Biomedical Industry

Purpose of Policy
The purpose of this policy is to define the parameters of appropriate interactions between students and faculty in the undergraduate medical education environment at the University of Connecticut School of Medicine with representatives of the pharmaceutical, nutriceutical, biomedical, and any commercial industry (including publisher, board review entity, etc.). Undergraduate medical education at UConn SOM is conducted in a variety of environments. Across this diverse spectrum of environments there are many opportunities for interactions between students and industry/commercial representatives. While many aspects of such may be positive, others may create a conflict of interest or the perception of a conflict of interest and potentially compromise the educational mission of the School of Medicine. It is crucial that the educational environment fosters the professional development of students in all its aspects.

The Liason Committee of Medical Education requires in standard ER-9 that medical education programs must have affiliation agreements in place that define the responsibilities of each party related to the educational program for medical students. The UConn SOM, through its affiliation agreements recognizes the important role that both Employed Clinical Faculty and Voluntary Physicians play in the teaching, training and supervision of medical students. Through the distribution of this policy to all parties involved in the educational process, the UConn SOM is providing guidelines and principles expected in all educational settings and requires adherence to this policy as well as all other policies involving students.

Policy Statement
It is the policy of the UConn SOM that any interaction between any members involved with the undergraduate program and representatives of the pharmaceutical/biomedical/commercial industry which are or could be perceived as conflicts of interest must be disclosed and appropriately managed. Specifically, such interactions should support the core principles of professionalism as defined by the AAMC, namely, autonomy, objectivity, and altruism.

Scope of Policy
The policy is inclusive of the following interactions

I. Gifts and Meals
II. Consulting Relationships
III. Industry Sponsored Speakers
IV. Disclosure
V. Pharmaceutical Samples
VI. Purchasing and Formularies
VII. Industry Sales Representatives
VIII. Attendance at Industry-Sponsored Lectures & Meetings
IX. Industry Support for Scholarships & Funds for Trainees
X. Disclosure Requirement in the School of Medicine Curriculum

1 Herein fore included in the terms “conflict of interest” or “COI”.
XI. Noncompliance

I. Gifts and Meals
   A. Students and SOM faculty may not accept any gift or compensation from industry in any site in which UME occurs, including UConn SOM affiliated sites. Gifts and compensation are defined as anything of value that is provided to an individual, significant other, or a family member for which nothing of approximate value has been provided in return. Examples of prohibited gifts are as follows include the following:
      1. Money, gift certificates, securities
      2. Support of travel or accommodations
      3. Free or discounted services
      4. Meals
      5. Free subscription to a commercial course
   Exceptions to this policy include unrestricted educational grants. However, these can only be provided to SOM administrative offices for educational uses that promote the institutional mission.
   B. Students and SOM faculty may not accept any gift or compensation for attendance at a presentation/talk by industry or commercial representative
   C. Students and SOM faculty must actively avoid the influence of industry in clinical care decisions (e.g. choice of drugs or other therapies).
   D. Students and faculty should also refer to the State Code of Ethics for further guidance.
   The following link is available to access this document:
   http://www.audit.uconn.edu/doc/codeofethics.pdf

II. Consulting Relationships
   Faculty must comply with the University of Connecticut Health Center policy and procedures for faculty consulting that may be found at: http://consulting.uconn.edu/policies.html http://www.policies.uchc.edu/policie...pdf
   Students in the School of Medicine who are requested to provide a service or enter a contract should consult this policy for guidance and contact the Office of Student Affairs for further direction.

III. Industry Sponsored Speakers
   A. Industry may provide unrestricted educational support for educational sessions and events. However, in doing so industry is prohibited from influencing the choice of speaker or the education content. Participants should be made aware of industry sponsorship. The preferred mechanism of providing such support within the School of Medicine is through an unrestricted grant to a Department, Center, or Program Director.
   B. Faculty may not accept honoraria from industry to speak at SOM functions.
   C. Students may not book rooms for commercial entities. There can be no meetings or events on site to promote a Board Review course, IT product, or other commercial entity.

IV. Disclosure
   A. Medical students and faculty may not publish under their own names articles that are written in whole or material part by Industry employees.
   B. If students and/or faculty have a financial interest that results in a scholarly publication, that interest must be disclosed in accordance with the International Committee of Medical Journal Editors (http://www.icmje.org).
   C. Faculty must ensure that their supervision of students is not encumbered by any
actual conflict, appearance of, or potential conflict of interest. In the event of a perceived conflict of interest, faculty must appropriately disclose to students and seek input from the educational administration of the SOM to manage the COI.

D. For disclosure requirements related to educational activities, see the ACCME Standards for Commercial Support (www.accme.org).

V. Pharmaceutical Samples
A. Sample medications cannot be distributed at UCONN School of Medicine. Samples may be distributed at affiliate sites and clinician offices at the discretion of the attending faculty. This decision must include disclosure to any student present, including both B and C below.
B. Students and faculty should be aware that distribution of samples potentially encourages patients to use products for which there are often less costly and equally effective alternatives.
C. Free samples may not be sold or used by students or teaching faculty for themselves or family.

VI. Purchasing and Formularies
Any faculty member or student responsible for or participating in making decisions regarding the purchase of equipment or medications must not have any financial interest with any company that might profit from the transaction. Indirect ownership through mutual funds is permitted.

VII. Industry Sales Representatives
Industry representatives may not have access to patient areas, and are only allowed in non-patient areas by appointment. These appointments should generally be restricted to in-service training or ongoing support of equipment or devices already purchased, including the evaluation of a new purchase. Medical students are not permitted to meet with sales representatives unless such encounters are supervised by faculty for teaching purposes.

VIII. Attendance at Industry-Sponsored Lectures & Meetings
A. Programs must be aware of the Accreditation Council for Continuing Medical Education (ACCME) Standards for Commercial Support. These Standards are a useful resource for all forms of Industry interaction; those on campus and off, including events sponsored by the institution and others. The Standards may be found at www.accme.org.
B. All education events sponsored by UConn SOM programs must be compliant with ACCME Standards for Commercial Support whether or not CME credit is awarded.
   1. Educational grants, particularly unrestricted grants, that are compliant with the ACCME Standards may be received from Industry by the program. ACCME guidelines include the following requirements:
      a. Financial support by Industry must be disclosed by the meeting sponsor.
      b. The meeting or lecture content must be dictated by the speaker and not the Industrial sponsor.
      c. The information presented must be a fair and balanced assessment of therapeutic options and promote objective scientific and educational activities and discourse.
      d. The selection of speakers or educational content by UConn SOM resident/fellow or teaching faculty must not be a condition of the industry sponsor’s financial or material support.
C. Food provided to students/residents/fellows may not be directly funded by Industry or any commercial entity. Industry is permitted to provide unrestricted educational funds.
to a Department, Center, Program Director, or designee on behalf of the program that may be used for refreshments at educational sessions. The contributing Industry(ies) can be credited for contributing an unrestricted educational grant for the session.

D. This provision does not apply to meetings of professional societies that may receive partial Industry support for professional meetings governed by ACCME Standards.

On-Campus:
Students may not book rooms for commercial entities (see III above).

Off-Campus:
Students are encouraged to pay particularly heightened attention to the content and organization of such meetings and lectures and to assess the following issues when determining the academic value of any conference, lecture, or meeting:
   a. Disclosure of support and COI’s for all speakers
   b. Oversight of the content
   c. Bias and balance
   d. Compensation, rewards and gifts for attendees

IX. Industry Support for Scholarships & Funds for Trainees
Any industry sponsored scholarship or trainee funding must be provided directly to the School of Medicine. Such support must be unrestricted and free of oversight by the contributor, and it must be accompanied by a Letter of Agreement that is consistent with ACCME Standards for Commercial Support. The evaluation and selection of recipients of support is the sole responsibility of the UCONN School of Medicine.

X. Disclosure Requirement in the School of Medicine Curriculum
Faculty must fully disclose any conflicts of interest related to their lectures and materials used in the educational setting. These disclosures must be registered with the Home Office of Medical Education and be fully visible in any audiovisual materials as well as the instructor’s syllabus. Where relevant such disclosures must be made at the start of educational sessions with the requirement of a disclosure slide as the first or second slide of any talk. The slide must specify for educational purposes what the perceived conflict might be.

All students must undergo training in Conflict of Interest with Industry. This training developed by the School of Medicine is included in the orientation schedule of incoming students and the Principles of Clinical Medicine course.

XI. Noncompliance
Where students are concerned, violation of this policy will be considered a breach of professionalism. Such violations should be reported to the Associate Dean for Student Affairs or the Senior Associate Dean for Education. Inadvertent violations provide an opportunity to educate the student and reinforce the importance of the policy. Repeated or deliberate violations must be referred to the Academic Advancement Committee for consideration of sanctions and as the school will be developing new processes for professionalism, any breach would follow that newly defined process that could funnel into the Academic Advancement Committee for repeated or egregious infractions.

Monitoring and potential discipline of faculty who abridge the policy are outlined in the University of Connecticut Health Center policy 2006-01 (updated in 8/2012), Individual Financial Conflicts of Interest in Research which can be found at http://www.policies.uchc.edu/policies/policy_2006_01.pdf.
The following resources were used to create this policy:

Community and Continuing Medical Education Disclosure Declaration – Conflict of Interest, [http://cme.uchc.edu/education/disclosure.html](http://cme.uchc.edu/education/disclosure.html)

Interaction between University of Connecticut School of Medicine Graduate Medical Residents/Fellows and the Pharmaceutical, Nutriceutical and Biomedical Industries (“Industry”) Policy, [http://gme.uchc.edu/pdfs/policybook/74.pdf](http://gme.uchc.edu/pdfs/policybook/74.pdf)

The University of Connecticut Health Center Policy Number 2000-01, Faculty Consulting Policy (Conflict of Commitment) University Policy, [http://www.policies.uchc.edu/policies/policy_2000_01.pdf](http://www.policies.uchc.edu/policies/policy_2000_01.pdf)

The University of Connecticut Health Center Policy Number 2009-3, Institutional Conflicts of Interest in Research, [http://www.policies.uchc.edu/policies/policy_2009_03.pdf](http://www.policies.uchc.edu/policies/policy_2009_03.pdf)


The Pew Charitable Trusts, 2008, The Prescription Project Toolkit series. Series includes: Drug and Medical Device Procurement; Ghostwriting and Speakers Bureaus; Pharmaceutical Samples; Gifts, Meals and Entertainment; Vendor Relations