



GME VENDOR INTERACTIONS WITH TRAINEES

Policy Title: GME Vendor Interactions with Trainees

Policy Number:

Applies to: ESFCOM Sponsored Residency and Fellowship Programs, Trainees

Date: 05/24/18

1.0 Policy Statement:

It is the Elson S. Floyd College of Medicine (ESFCOM) policy to ensure that graduate medical education activities at ESFCOM and Trainees at affiliated clinical sites are not compromised through vendor influence, either collectively or through interactions with individual Trainees.

2.0 Definitions

Conflict of Interest (COI): when reasonable observers could conclude that professional requirements of a physician's roles are or will be compromised due to the influence by a vendor through gifts or services. All COI must be disclosed by the speaker in any ESFCOM GME sponsored event.

Designated Institutional Official (DIO): The individual in a sponsoring institution who has the authority and responsibility for oversight and responsibility of all of the ACGME-accredited programs.

Gift: an item of value provided without explicit expectation of something in return. (cash or cash equivalents, outside meals at restaurants, promotional items, services such as transportation, invitations to participate in social events, entertainment or recreational opportunities, business courtesies such as food and beverages, "ghost-writing" of scholarly works on behalf of the Trainee)

Program Director: The designated person accountable for the Program; this person must be selected by the Designated Institutional Official and possess qualifications acceptable to the appropriate Residency Review Committee (RRC) of the ACGME.

Trainee: a physician in training at an ACGME accredited graduate medical education program, the term includes Interns, Residents, and Fellows or other trainee enrolled in an educational program whose education falls under the purview of the ESFCOM Office of Graduate Medical Education.

Vendor: any pharmaceutical, medical device, medical education, biotechnology company, or other industry that provides goods or services related to medicine or the practice of medicine including individuals representing such companies or industry.

3.0 Responsibilities

GMEC through the DIO; Associate Dean for GME; Assistant Regional DIOs; Program Directors

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4.0 Procedures

The relationship between Industry and medical care providers can be beneficial to all parties, while maintaining patient care in primacy. Trainees will ultimately leave the protection of the training environment and will interact with Industry as independent providers in the future. Therefore, it is the responsibility of sponsoring educational institutions and training programs to provide Trainees with tools to critically evaluate and assess promotional and informational activities by Industry, while providing them with the appropriate environment in which to develop their professional core values. The purpose of this policy is to foster and ensure an environment that achieves these goals.

Conflict of Interest Curriculum

All ESFCOM sponsored training programs must provide an educational program for all Trainees regarding appropriate interactions with commercial and pharmaceutical companies and the ethics of dealing with possible conflict of interest, and the rationale of each.

Consultation and Advising Relationships

Trainee consulting or advising relationships are prohibited.

Industry Funded Promotional Programs

Trainees are discouraged from attending industry-sponsored promotional events where the goal is to increase physician use of the promoted drug or device. Trainees may not directly accept industry reimbursement for travel or other remuneration.

Medical Device Representatives

Only with the permission of the Program Director, may vendors inform Trainees about new products and provide technical training on devices and equipment already purchased.

Pharmaceutical Sales Representative Access

Other than in training program authorized, scheduled, planned activities, Trainees are discouraged from having contact with pharmaceutical sales representatives.

Ghost writing and honorary authorship:

Industry-funded ghostwriting and honorary authorship is strictly prohibited.

Gifts to Trainees

ESFCOM Trainees may not accept gifts, regardless of value, for themselves or on behalf of ESFCOM or WSU, individually or as a group, from any vendor or manufacturer of a health care product or from the representative of any such vendor or manufacturer. In addition, acceptance of such gifts and services may be a violation of the Washington State Ethics in Public Service Act (RCW 42.52.150).

Industry Sponsored Programs

Trainees may not participate as paid presenters or speakers in industry sponsored

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programs such as lectures and panels without express written permission of the Program Director. Trainees participating in such activity must report for duty hour purposes the actual time spent in the activity, and must also disclose to the Program Director the amount of any compensation offered, including nonmonetary items. If approved in advance by the program director, the Trainee must submit an external moonlighting request to the GME Office.

Trainees are permitted to attend any offsite event that offers Continuing Medical Education (CME) or other credit. Scholarships provided from a vendor must be directed to a central academic fund within the academic department or the GME Office and should not designate an individual Trainee as recipient. The Program Director, DIO or designee, must choose the individual and must approve the conference and certify that it is of substantial value to the Trainee's education.

Program Directors are encouraged to include assessment of vendor interactions as part of the Trainee semi-annual review and require documentation of vendor interactions in the Trainee's portfolio. Programs should ensure that the policies described here are observed.

Program Directors must communicate this policy to their trainees as part of the program orientation and reinforce it through inclusion in program handbooks and other information sites for Trainee reference. Because Trainees participate in many different venues, it is possible that they will encounter conflicting policy statements on various aspects of vendor interactions and conflict of interest. Where a conflict exists between this policy and that of another organization or clinical affiliate, it is the overarching policy of ESFCOM that the stricter or more stringent policy will apply to a given situation within that organization.

Many ESFCOM affiliated clinical training sites support policies governing vendor practices and interactions. It is the responsibility of all ESFCOM sponsored training programs, faculty, and Trainees to also observe local policies.

5.0 Related Policies

WSU Ethics Conflict of Interest, and Technology Transfer. EP27
Conflict of Interest. CU.06.03
Compliance and Ethical Conduct. EC.00.05

6.0 Key Search Words

Vendor; Industry; Conflict of Interest
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7.0 Revision History

Original Approval	Policy number	Revision Date Approval
May 24, 2018		

Responsible Office: Designated Institutional Official; GME Office

Policy Contact: GME Office, GME Director, Institutional Coordinator

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Supersedes: N/A