

HACKENSACK MERIDIAN *HEALTH* *OCEAN MEDICAL CENTER* GRADUATE MEDICAL EDUCATION POLICIES AND PROCEDURES

Subject: INTERACTIONS WITH VENDORS	Policy Number: 10.A
Approved by GMEC: March 7, 2016	Approved by MEC: June 7, 2018

1. INTRODUCTION AND PURPOSE

This policy addresses resident/fellow behavior and relationships with vendors in educational contexts, which may include clinical training sites. The purpose of this policy is to ensure that Graduate Medical Education activities at Hackensack Meridian Health (HMH) are not compromised through vendor influence, collectively or through individual interactions. The goal of this policy is to further the professional accountability in trainees to their patients and colleagues.

2. SCOPE

This policy will apply to all of the postgraduate training programs at Hackensack Meridian Health (HMH) facilities.

3. APPLICABLE REGULATIONS AND GUIDELINES

ACGME Institutional Requirements IV.K. Effective Date: July 1, 2018
Administrative Policies and Procedures #: **PolicyStat ID: 3376799**
Pharmacy Policy # **PolicyStat ID: 3639127**

4. DEFINITION

Resident refers to all interns, residents and subspecialty residents (fellows) engaged in post graduate education at Ocean Medical Center. They are also identified by their year of postgraduate training (e.g. PGY 1).

5. PROCESS OVERVIEW

A. Policy

B. Responsibility/Requirements

6. RESPONSIBILITY/REQUIREMENTS

A. Policy

Throughout their professional life, physicians will interact with representatives of pharmaceutical companies and device manufacturers. It is the policy of HMH to model, teach and restrict behaviors related to such interactions so as to avoid any potential for conflict of interest or inappropriate influence in the therapeutic environment.

B. Responsibility/Requirements

- I. Acceptance of pharmaceutical samples for delivery to patients by residents or fellows is not allowed.
- II. HMH residents and fellows may not accept gifts, other than trivial value (e.g., pens), for themselves or on behalf of HMH, individually or as a group, from any vendor of a healthcare product.
- III. Vendors may provide modest meals in conjunction with resident conferences provided that the conference is **not** approved for CME and provided that the entire content of the educational program is developed and controlled by HMH residents and faculty.
- IV. Any presentation, educational program or information provided in any context by vendors must support and reflect medication use decisions of the Meridian Central Formulary in accordance with **PolicyStat ID: 3639127**. Such presentations require prior approval of the pharmacy site manager or are undertaken in the presence of member of the HMH faculty.
- IV. Educational activities involving CME accreditation, which may also be open to residents, may be supported only by unrestricted grants. The grantor may not specify content, topic, or speaker.
- VI. Residents and fellows may not participate as paid presenters or speakers in industry-sponsored programs such as lectures and panels without the express permission of the Program Director. Residents or fellows participating in such activity must report for duty hour purposes the actual time spent in this activity, and must disclose to the program director the amount of any compensation offered, including non-monetary items.
- VII. Programs should provide training to residents and fellows on vendor relations and conflicts of interest, including reference to this policy and other relevant institutional policies. Program leadership should be aware of and discuss with residents any interaction with representatives from vendors to ensure that any contacts are within the scope and spirit of this policy. Interactions that appear to place the resident in a position of obligation to or influence by, the vendor, should be explicitly discouraged.