

	POLICY: Industry Relationship Guidelines
Facility: Inova Fairfax Medical Campus (IFMC)	Key Words:
Applies To: IFMC	
Policy Manual: IFMC Administrative Policy & Procedure Manual Policy # 5-18-5	
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I. Purpose

This document outlines Inova Fairfax Hospital’s guidelines concerning relationships and interaction with industry and seeks to avoid real or perceived conflicts of interest.

An effective and principled partnership between academic medical centers and various health industries is critical in order to fully realize the benefits of biomedical research and insure continued advances in the prevention, diagnosis and treatment of disease.

For these reasons we have adopted guidelines to assure the public that we will uphold the highest standards of professionalism and to insure the public trust.

II. Applies to

These guidelines apply to all employed Inova Fairfax Medical Campus faculty, healthcare providers, residents and students in Inova sponsored programs.

III. Definition of Terms

<u>Industry</u>	refers to any person or company seeking to do or doing business with Inova Fairfax Hospital/Inova Fairfax Hospital for Children (IFH/IFHC) including any pharmaceutical, medical device, medical publishing or medical equipment companies
<u>Conflict of Interest (COI)</u>	exists whenever an individual or an institution has a primary allegiance that requires certain actions and, simultaneously, has a secondary interest that a) could abrogate the primary allegiance

	and b) is sufficiently tempting to raise a reasonable possibility that it might actually do so
<u>Gift</u>	means any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. It includes services as well as gifts of transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance or reimbursement after the expense has been incurred

IV. Policy

Gifts to Individuals

- Gifts from industry and/or representatives are prohibited. This encompasses gifts from equipment and service providers as well as pharmaceutical and device manufacturers.

Pharmaceutical Samples

- The distribution of medications should be centrally managed in a manner that ensures timely patient access to optimal therapeutics throughout IFH/IFHC.
- Samples are not allowed on the IFH/IFHC campus. As per The Joint Commission, samples are only allowed in outpatient settings.
- If central management is not thought to be feasible, or would interfere with patient access to optimal therapeutics, IFH/IFHC should carefully consider whether or not there are alternative ways to manage pharmaceutical sample distribution that do not carry the risks to professionalism with which current practices are associated.

Site Access by Pharmaceutical Representatives

- To protect patients, patient care areas, and work schedules, access by pharmaceutical representatives to individual physicians should be restricted to non-patient care areas and nonpublic areas and should take place only by appointment or invitation of the physician.
- Involvement of students and trainees in such individual meetings should occur only for educational purposes and only under the supervision of a faculty member.
- Pharmaceutical representatives may be invited to a patient care area when training or demonstrating a product

Site Access by Device Manufacturer Representatives

- Access by device manufacturer representatives to patient care areas is permitted only when the representatives are appropriately credentialed by Inova Fairfax Hospital and should take place only by appointment or invitation of the physician.
- Representatives should not be allowed to be present during any patient care interaction unless there has been prior disclosure to and consent by the patient, and then only to provide in-service training or assistance on devices and equipment.
- Student interaction with representatives should occur only for educational purposes under faculty supervision.

Continuing Medical Education

- Continuing Medical Education (CME) industry support and receipt of funds should be coordinated and overseen by the CME office.
- CME will institute audit mechanisms to ensure compliance with MSV Standards for Commercial Support of CME. CME requires financial disclosure and COI management for those involved in planning a CME activity.
- Faculty must disclose personal and professional relationships with industry in all CME sponsored activities.
- IFH/IFHC strongly discourages faculty, residents, and students from attending industry-supported medical education that is non-CME or that is not offered by hospitals, health systems, specialty societies, and medical schools. Exceptions to this must be approved by the appropriate Inova supervisor, CME office, or chairman.

Participation in Industry Sponsored Programs

- Participation in industry-sponsored speakers' bureaus is strongly discouraged, with the exception of settings in which investigators are presenting results of their industry-sponsored studies to peers and there is opportunity for critical exchange.
- Providers, faculty and staff who participate in industry-sponsored, FDA-regulated programs, should adhere to the following standards:
 - There should be full transparency and disclosure to the institution when participating in such programs; and
 - Payments received should only be at fair market value.
- Providers, staff, and trainees are strongly discouraged from attending industry events that are not CME accredited. Exceptions to this must be approved by the appropriate Inova supervisor, CME office, or chairman.

- Providers, staff, and trainees are strongly discouraged from engaging in the following activities:
 - Accepting payment for attendance at industry-sponsored meetings; and
 - Accepting personal gifts from industry at such events.

Industry-Sponsored Scholarships and Educational Funds

- All scholarships or other educational funds from industry must be given to a central coordinating office designated by administration.
- No quid pro quo is to be involved in any way; and
- The allocation and distribution of such funds to recipients must be the sole responsibility of the designated office/official based on institutional guidelines and with no involvement by the donor industry.

Food

- Industry-supplied food and meals can be provided in connection with off-site CME-accredited programming and in compliance with ACCME/MSV guidelines.
- Faculty and trainee participation in industry-sponsored off-site, non-CME sponsored functions (e.g., satellite symposia, meetings, dinner talks) is strongly discouraged.
- No food will be accepted on hospital property unless in conjunction with an approved educational program and supervised by the Department Director or faculty.

Professional Travel

- Faculty, trainees, and students are directly prohibited from accepting travel funds from industry, other than for legitimate reimbursement or contractual services and upon authorization by Department Chair or designee.

Vendor Sponsored Education

- Any vendor sponsored educational programs must be approved by the Department Chair or designee. The Department Chair's approval does not constitute an endorsement of the speaker or the opinions that may be expressed. It is understood that during such programs the speaker is not speaking on behalf of Inova Health System. CME cannot give credits to ANY vendor sponsored event-unless there is an Unrestricted Grant given for the talk.
- A needs assessment and learning objectives must be approved in writing in advance of any program.
- It is preferred that CEU's or CME's are offered with any educational programs.

Ghostwriting

- IFH/IFHC prohibits faculty, trainees, and students from allowing their professional presentations of any kind, oral or written, to be ghostwritten (i.e. written by someone who is not an author) by any party, industry or otherwise.

Purchasing

- Faculty and personnel with any financial interest in any particular manufacturer of pharmaceuticals, devices, or equipment, or any provider of services, are required to disclose such interests according to institutional policies and to recuse themselves from involvement in purchasing decisions relevant to the conflicting interests.
- To the extent an individual's expertise is necessary in evaluating any product, that individual's financial ties to any manufacturer of that or any related product must be disclosed to those charged with the responsibility for making the decision.

Physician-Patient Interaction with Regard to Potential Conflict of Interest

- Relationships that tie compensation to individual or institutional use of products or devices are prohibited.
- Relationships between Inova-employed healthcare providers and industry must be disclosed to patients when the provider has been involved in the research, development or marketing of the product.

Providers as Consultants to Industry

- Providers may qualify as consultants if they are engaged for an exchange of information about important treatments or developments, to review and comment on a product, to discuss independent research projects or their results and to explore the potential for research.
- Providers whose activity qualifies as consulting must comply with the related policies governing fair market value compensation for services performed and specified in advance, guidelines on potential conflicts of interest, publications and disclosure requirements.