

This month's topic is **Conflict of Interest**, and the implementation of the UTHSCSA policy **GUIDELINES FOR INTERACTIONS BETWEEN CLINICIANS AND INDUSTRY**, located at <http://www.uthscsa.edu/hop2000/word/7.7.3.doc> (and echoed as GME Policy 2.1.20 at <http://www.uthscsa.edu/gme/gmepolicies.asp>).

These FAQs (as well as the March set) are posted at on our GME site at http://www.uthscsa.edu/gme/gmefaq_000.asp and are copied below.

Question: Is it consistent with UTHSCSA Conflict of Interest Policy to allow a **vendor representative to enter patient care areas** (e.g., operating room) during the operative procedure to provide some direct advice or assistance with the clinical implementation of a device or procedure?

Answer: Yes. For procedures where industry personnel provide some direct advice or assistance with the clinical implementation of a device or procedure, it is appropriate for them to be present.

Question: Is it consistent with UTHSCSA Conflict of Interest Policy to request an unrestricted educational grant from industry to support the provision of **food** during regular institutional educational activities/meetings such as noontime meetings with residents?

Answer: Yes. Using funds provided to the institution as part of an unrestricted educational grant to offset the costs of food at an educational event is allowable. Unrestricted educational funds are unrestricted – meaning that they can be used in any way you see fit to enable the event and offsetting the cost of food at an educational event is appropriate. However, the provision of free food should not be the primary purpose of the grant. It would not be appropriate to ask Industry for a grant simply to provide a free lunch for residents or faculty.

Question: We have **journal club** at a faculty member's home once a month, and the food is provided by one of our pharmaceutical representatives. He doesn't advertise but does attend and provide educational materials. Is this permissible?

Answer: If the principle reason for the journal club is academic rather than social (in this case, literature review), and food is incidental rather than a focus of the gathering, it may be provided through unrestricted educational grant funds. The pharmaceutical representative should not make the food purchase, deliver the food, nor attend the event.

Question: We hold a **reception** for resident applicants (off campus) to introduce faculty/residents and discuss the residency program. Is it permissible to have a company representative provide refreshments?

Answer: The principle reason for the gathering is not academic, and thus should not be supported by industry funds nor attended by company representatives.

Question: For our residency program's graduation event, in which the graduating residents are acknowledged and the Educator of the Year award is made, company representatives are considered guests, and they pay for themselves and any additional guests directly to the facility. Is this acceptable?

Answer: The principle reason for the gathering is not academic, and thus should not be supported by industry funds nor attended by company representatives.

Question: How should an **educational grant** be requested and routed thru UTHSC (which office)?

Answer: All unrestricted educational grant requests to industry need to be submitted through either OSP (Office of Sponsored Programs) or CME (Continuing Medical Education). If/when the approved grant funds are received by either OSP or CME, the office will then notify the department of the award and transfer funds to the department.

Question: The residents in our program are given **textbooks** each year by one of the companies that manufactures devices used in our specialty. Can this practice be continued?

Answer: No since these would be considered to be gifts.

Question: We have lots of **pens and post-it pads** with drug company logos on them – do they have to be discarded?

Answer: The institutional policy does not speak to this. It might be most appropriate to return these to the appropriate industry representative so that they may consider donating them to a good cause.