

Project Vida Health Center
Community Psychiatry Residency
Graduate Medical Education Policies and Procedures

Pharmaceutical/Vendors

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PURPOSE: To set forth guidelines for appropriate vendor access and solicitation within PVHC. It is the policy of the Graduate Medical Education Committee to establish guidelines for ethical interactions with commercial vendors/representatives. Residents will not be allowed to interact with commercial/industry representatives without permission of the Program Director. Any vendor or industry representative wishing to interact with the residency program first must contact the Program Director for permission.

Policy:

Resident - Interns, residents and subspecialty residents (fellows) enrolled in a PVBHC sponsored postgraduate training program.

Vendor - A company, its representative or the agent of a company that either produces or markets drugs, devices, nutritional products, or other products or services.

The following situation-specific rules apply:

1. **Pharmaceutical Samples:** the acceptance by a resident or faculty of free pharmaceutical samples for delivery to patients is not allowed. Acceptance of pharmaceutical samples for self-use is strictly prohibited for all residents and faculty.
2. **Vendor gifts:** "Gifts" refers to items of value given without explicit expectation of something in return. Gifts may also include outside meals at restaurants, promotional items, services such as transportation, invitations to participate in social events, promotional items, and business courtesies, and meals and beverages. Residents and faculty may not accept gifts, regardless of value, for themselves or on behalf of the program, 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. This includes food supplied at educational conferences as well as meals provided off-site.
3. **Vendor Sponsorship of Educational Activities:** Vendor sponsorship of GME educational activities should take place under unrestricted grants and gifts only. An unrestricted grant or gift is one that given to the program in which the donor(s) have specifically identified their intent to support certain activities (such as education for residents). In instances where the grant is for GME educational use, the donor may not specify content, topic, or speaker. However, the grant may specify whether or not the purchase of food for a conference is allowed.
4. **Vendor Training:** Vendors may appropriately orient, train, and advise residents and faculty on the proper use or calibration of a product that has already been acquired by PVBHC. In such cases, the

vendor is present as a consultant and must solely advise on the specific device and should not be allowed to market other products. Supervising faculty physicians must ensure that vendor involvement in any clinical activities is disclosed to patients verbally and in writing.

- Vendors must be identified as such so that they are not mistaken for clinicians.
- In situations where the training is to take place at a site distant to PVHC, the vendor may not contribute to a specific resident's travel, housing, or per diem expenses incurred as part of this training.
- The vendor may contribute to an unrestricted grant that could be used by the program to reimburse residents for travel costs and per diem according to PVHC policy. Vendor contribution to individuals is limited to waiver of any tuition or fees, and instruction manuals specifically related to the operation of the equipment.

5. Participation in Industry-Sponsored Programs: Residents and faculty may not participate as paid presenters or speakers in industry sponsored programs such as lectures and panels without express written permission of the program director. Residents 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.

6. Program Monitoring of Resident-Vendor Representative Interactions

A. 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.

B. Program should provide training to residents on vendor relations and conflicts of interest, including reference to this policy and other relevant institutional policies.

C. Program director must communicate this policy to trainees as part of program orientation and reinforce it through inclusion in program handbooks and other information sites for resident reference.