

CHRISTIANA CARE HEALTH SERVICES

POLICY:	Vendor Interactions
DEPARTMENT:	Academic Affairs - iLEAD
DATE OF ORIGIN:	October 26, 2011
LAST REVISION DATE:	November 11, 2015
REGULATORY REFERENCE:	ACGME ¹

POLICY:

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 Christiana Care Health Services, Inc. and affiliated training are not compromised through vendor influence, collectively or through individual interactions.

DEFINITIONS:

“Vendor” refers to a supplier of capital items, supplies or services. Examples include, but are not limited to: pharmaceutical sales representatives, medical device sales representatives, insurance salespersons, and financial advisors.

“Gifts” refers to items of value given with or without explicit expectation of something in return. Gifts may include meals and beverages, outside meals at restaurants, promotional items, services such as transportation, invitations to participate in private social events, and business courtesies.

“In Educational Contexts” refers to interactions between vendors and resident/fellows based upon the resident/fellow’s role as a Christiana Care employee and/or participation in his/her graduate medical education program.

PROCEDURE:

Pharmaceutical Samples

Acceptance of pharmaceutical samples for self-use is strictly prohibited for all Residents and Fellows. Acceptance of pharmaceutical samples for delivery to patients by Residents or Fellows is not allowed except through approved institutional mechanisms.

Vendor Gifts

Residents/Fellows must recognize that gifts to healthcare providers from industry create conditions that carry the risk of subtly biasing – or being perceived to bias – professional judgment in the care of patients. To preserve the trust that is fundamental to the patient- provider relationship and public confidence in the profession, Residents/Fellows should:

¹ ACGME, Principles to Guide the Relationship between Graduate Medical Education, Industry, and Other Funding Sources for Programs and Sponsoring Institutions Accredited by the ACGME (October 2011)

1. Decline cash gifts in any amount from an entity that has a direct interest in the resident/fellow's treatment recommendations.
2. Decline any gifts for which reciprocity is expected or implied.
3. Accept in-kind gift for the provider's practice only when the gift:
 - a. Will directly benefit patients; and,
 - b. Is of minimal value.

Vendor Sponsorship of Educational Activities On-Site

Vendor sponsorship of on-site GME educational activities should take place under unrestricted grants and gifts only. An unrestricted grant or gift is one that is given to a department or 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. It is left to the discretion of the Program Director or his/her designee to accept sponsorship of meals and catering at educational events.

For on-site educational activities, the following conditions must be met:

1. Vendors shall not solicit Christiana Care residents or fellows on Christiana Care's campus or at any clinical teaching site.
2. Vendors may not distribute marketing literature or set up booths in or around educational venues on campus except during an educational event approved by the Program Director or Academic Affairs leadership (e.g., lectures, conferences, departmental Grand Rounds).
3. No gifts, free samples, books or promotional materials with the manufacturer, drug, or device name imprinted shall be distributed or made available at educational events.
4. The sponsorship may be acknowledged verbally at the start of the event, in a sign at the event, through a website acknowledgement, or in a written program.

Vendor Sponsorship of Educational Activities Off-Site

Residents and Fellows may attend off-site vendor-sponsored educational activities, including conferences, dinner lectures, and other programs. When it is not clear, it is up to the ultimate discretion of the Program Director to determine if a specific activity is appropriate. Vendor-provided funds for residents and fellows to attend off-site conferences and other educational events must be directed to a central fund within the academic department or residency program and must not designate an individual resident or fellow as recipient. Residents/Fellows may attend vendor-sponsored social events connected to educational conferences or programs (such as a meal, reception, and/or entertainment opportunity) but generally should only attend if the event is open to all conference attendees.

Vendor Training on Equipment

At the discretion of the Program Director, vendors may sponsor resident and fellow training on equipment. In such cases, the vendor is present as a consultant and must solely provide instruction on the specific device and should not be allowed to market other products.

For off-site training, the vendor may not pay directly for a specific resident's travel, housing, or per diem expenses incurred as part of this training, but may contribute to an unrestricted grant that could be used by the program to reimburse residents for tuition, fees, materials, travel costs and per diem according to Christiana Care's travel policy.

Participation in Industry-Sponsored Programs

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.

Program Monitoring of Resident-Vendor Representative Interactions

Program leadership should be aware of and discuss with residents any interaction with representatives from vendors so 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. 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.

SIGNATURES/APPROVALS:

A handwritten signature in cursive script, reading "Dr. Vaughn V. Wright", is written over a horizontal line.

Reviewed 02/15/2019