

Healthcare Vendor Relations Policy School of Veterinary Medicine Guidelines

These guidelines are designed to clarify the implementation procedures for ensuring School of Veterinary Medicine compliance with the University of California Healthcare Vendor Relations Policy, <http://www.ucop.edu/ucophome/coordrev/policy/PP031208Policy.pdf>

A Healthcare Vendor is defined as a company or its representative or the agent of a company that either produces or markets drugs, devices, nutritional products, or other medical products or services. Examples of a healthcare vendor include pharmaceutical companies, medical supply companies, pet food companies, etc.

A. Gifts and Compensation Provided by Healthcare Vendors

1. Healthcare vendors may make unrestricted gifts to the University. Those funds may be used to purchase food for meetings or conferences. However, vendors may not directly provide food or any other gifts to University faculty, staff or students.
2. It is acceptable for healthcare vendors to pay the University a specified sum to set up a booth at a University event. Small items may be provided by vendors to University faculty, staff or students who visit a booth, or who attend a presentation made by the vendor, if the give-away items are left in a central location, and made available to all participants.
3. Healthcare vendors may not pay travel expenses for faculty, staff or students to attend courses or other events sponsored by the vendor. Vendors may, however, make unrestricted gifts to the University, and those gifts may be used to cover travel expenses.
4. Supplies donated by healthcare vendors may not be used on an on-going basis for patient care purposes. Supplies donated may be provided free of charge to patients for evaluation purposes for first time use only, no prescription refills. It is not permissible for the VMTH to stock donated items for use in patient care on an on-going basis.
5. Student clubs arranging meetings with healthcare vendors must adhere to the Healthcare Vendor Relations Policy, including implementation guidelines included in this document. Vendors may not provide gifts to students, or provide food for an event. The vendor may, however, make a donation to the School of Veterinary Medicine, to be deposited into a University account. Two accounts will be established—one for unrestricted gifts, and one for gifts that are to be limited to funding educational activities of the students. Donations from all vendors will be deposited into one of these accounts, which will be managed by the SVM Office of Student Programs. These accounts may be used to charge the costs of food for various vendor presentations, and any costs associated with the use of University facilities. SCAVMA will identify the amounts charged to these accounts, and SVM Student Programs will manage the accounts based on that direction. Up to \$15,000 per year may be used to fund TG events. An acknowledgement of the donations from all vendors, such as a banner with

the names or logos of all donors, may be displayed at vendor events. In addition, a speaker may bring a banner, or some display showing the organization he or she represents.

6. Gifts of healthcare products and pet food may be made to the teaching programs operating out of the teaching laboratories and the subsidized Community Surgery clinical teaching program currently operating out of Gourley Hall for use on animals because all of the patients seen are either not owned, or are animals to which services are provided free or at a deep discount because their owners qualify as low income clients. Gifts of healthcare products are not permitted in the VMTH, except as noted in item 4 above.
7. Events such as those providing heartworm tests, micro-chips or other products for students' pets or for sale to pets with the proceeds going to students are not in compliance with policy and will no longer be allowed.
8. Exclusions from the definition of a gift are items provided at a discount, items provided for free as part of a research project, and prizes or awards from a bona fide competition.

B. Interaction between Healthcare Vendors and faculty, staff and students

1. All healthcare vendors who present to the Veterinary Medical Teaching Hospital (VMTH) for the purpose of making a sales call or presentation to the Pharmacy or Central Service Unit, any clinical Service area or a faculty member must have previously made an appointment with the individual Unit, Service or faculty member.
2. Upon arrival at the VMTH the healthcare vendor representative(s) must sign the Healthcare Vendor Log located at the Large Animal or Small Animal Client Services reception area. A Client Service staff member will then contact the appropriate faculty or staff member to notify them that the vendor representative(s) has arrived for the scheduled meeting. A Client Service staff member will issue the vendor representative(s) a temporary badge and escort him or her to the appropriate area. Under no circumstances will a vendor be allowed to visit/meet with a Service area or clinician if a prior appointment has not been scheduled.
3. All healthcare vendors must sign out and return their temporary badge when their visit has been completed. Vendors may not enter patient care areas.
4. Healthcare vendors making presentations to students or student organizations are in compliance with University policy if the vendor does not provide food or gifts to students, and the presentation is made at the invitation of University personnel. All requests by healthcare vendors to make presentations to student groups and clubs are to be directed through SCAVMA and must be approved by Office of Student Programs administrators. The number of healthcare vendor presentations is limited to eight per quarter on campus. SCAVMA will identify which eight healthcare vendor presentations are to be scheduled for the respective quarter, and will forward a written or electronic request to SVM Student Programs. Student Programs will then forward the approved request to Academic Programs to schedule the room.
5. This policy applies to both on-campus and off-campus activities.

C. Continuing Education

Policies currently in place have been developed based on the Accrediting Council for Continuing Medical Education (ACCME) Standards for Commercial Support (Appendix A; http://www.accme.org/dir_docs/doc_upload/68b2902a-fb73-44d1-8725-80a1504e520c_uploaddocument.pdf), and meet the requirements of the Healthcare Vendor Relations Policy. Below are the key provisions of the ACCME Standards, including interpretations pertinent to veterinary CE programs involving the School of Veterinary Medicine.

1. The following decisions are to be made free of control of a commercial interest:
 - Identification of CE needs
 - Determination of educational objectives
 - Selection & presentation of content
 - Selection of all persons and organizations that will be in a position of control of the content
 - Selection of educational method
 - Evaluation of the activity
2. The CE provider (including program leaders) cannot be required by a commercial interest to accept advice or services concerning instructors, authors, or participants or other educational matters, including content, from a commercial interest as a condition of contributing funds or services.
3. The SVM will not accept “sponsorships” from commercial industry or other educational partners for continuing education programs; however, the SVM can accept **educational grants** that explicitly provide no “quid pro quo” relative to the topics or speakers:
 - a. The terms, conditions and purposes of support from commercial sources will be documented in writing;
 - b. Educational grants to support events, including meals or special presentations on specific products, can be accepted but must be clearly separated from the continuing education program in order to maintain independence of CE programs from commercial interests;
 - c. Social events or meals will not compete with or take precedence over the continuing education activity;
 - d. Honoraria and expenses will be paid by the SVM and are not to be sourced directly from a commercial or non-commercial educational partner; and,
 - e. No payment, other than honoraria and reimbursement of out-of-pocket expenses, will be made to the director of the activity, planning committee, program leaders, speakers, authors or others University personnel involved in planning, organizing and conducting the CE program.
4. To serve as a Program Leader, the faculty or staff member must declare any relevant financial relationships with associated commercial interests within the previous 12 months.
5. Product-promotion material or product-specific advertisement must be kept separate from continuing education activities:

- a. No product-specific information is allowed in the syllabus or CE handouts
- b. No. product-specific information is allowed in the room with the CE program

6. Disclosures

- a) To be provided to learners prior to the learning activity:
 - 1. All speakers and involved faculty are required to complete and sign a conflict-of-interest statement on which they can declare one of the following: *(1) no conflicts, (2) conflicts listed or (3) decline to declare any conflicts*. These statements will be made available to all participants so that they can determine if any comments made by speakers and involved faculty may have been influenced by the conflict.
 - 2. A written conflict-of-interest statement from the producing organization (historically the Center for Continuing Professional Education) similar to that required of speakers.
- b) A written and signed declaration by the speaker committing them to identify any extra label use of drugs or medical devices described in his or her presentation
 - 1. A written release from the author must be on file for any written materials distributed as part of the program recognizing the author's ownership of his or her intellectual property and allowing the University to use the property limited to the specific program involved.

D. Purchasing Procedures

- 1. Purchasing decisions are made through the UCD campus purchasing unit, with multiple bids for major purchases, or a detailed justification for sole providers, as required by campus policy.
- 2. Pharmaceutical purchases are directed by the Chief Pharmacist, based on pricing and efficacy, with direction from the Product Evaluation or Pharmacy Committee, which includes two clinicians from the VMTH.
- 3. The VMTH may not receive any healthcare products, including pet food, free or at a discounted price that is lower than the pricing available to other commercial customers.

E. Pet Food Sales

- 1. Free or discounted pet food may not be provided to healthcare individuals—including health professional students—unless that same discount is available to the public without regard to status as health care individual. Policy does not allow the practice of offering free pet food to Veterinary School students after the students pay a \$50 fee to the UCD SCAVMA Chapter.
- 2. Health care employees may not receive discounted pet food unless that same discount is offered to the public without regard to status as a health care individual. Therefore the policy does not permit companies to offer pet food to the School of Veterinary Medicine employees at a deep discount.
- 3. Pet food may not be provided free to the VMTH Nutritional Support Services, except for items that are part of a research project. Donated food may be used in the Gourley Clinical Teaching Center because it is essentially a free clinic for un-owned patients and

occasionally for patients with low-income owners. This policy would permit support from the healthcare vendors to the VMTH in the form of funding instead of pet food.

F. It is permissible under the Healthcare Vendors Relations Policy for vendors to employ student representatives.