

The Policy and Guidelines Relationship of the Pharmaceutical and Related Biomedical Industries to Undergraduate and Graduate Medical Education at NYU School of Medicine

Revised/Effective:	10/23/2008
Reviewed:	10/17/2008
Supersedes:	n/a
Originally Adopted:	10/23/2008
Approved by:	Graduate Medical Education Committee
Web Address:	http://www.med.nyu.edu/housestaff/GME_Policies/index.html
Applies to:	All residents and fellows training in any program

PURPOSE OF POLICY:

This policy establishes guidelines for the interaction of New York University School of Medicine (NYUSOM) medical students and housestaff (“housestaff” or “trainee” in this document refers to all residents and fellows in both ACGME accredited or non-accredited programs at NYUSOM). The policy includes but is not limited to interactions at all NYUSOM facilities and affiliates, including Tisch Hospital, Rusk Institute of Rehabilitative Medicine, Hospital for Joint Diseases, Clinical Cancer Center, the School of Medicine, Bellevue Hospital, the Manhattan VA Hospital, other offsite Article 28 facilities and other sites under the auspices of NYUSOM.

It is the goal and policy of the School of Medicine (SOM) that its students and housestaff be trained in the highest standards of intellectual objectivity and clinical ethics. To promote these ends and to minimize commercial bias, the SOM establishes a policy to separate medical students and housestaff from solicitation, marketing, promotion or any other influential tactic by industry – pharmaceutical, device manufacturer, medical information technology developer or distributor, or other similar organization.

Appropriate interactions of physicians and industry can result in the exchange of information which promotes medical research and patient care. However, substantial recent evidence indicates that aspects of this relationship can alter the judgment and decision-making of physicians in ways that do not serve the best interests of our patients. Conflicts of interest arising from financial ties between physicians, their staff and industry also have the potential to influence a physician’s attitudes and practice.

The purpose of this policy is to provide a guide for medical students, housestaff, and their teachers and supervisors in their interactions with industry in order to provide an ethical environment that is consistent with sound clinical decision-making, patient safety, and patient privacy.

STATEMENT OF POLICY:

Interactions with pharmaceuticals and related biomedical industries should be conducted so as to avoid conflicts of interest or the appearance of a conflict. The scope of this policy includes, but is not limited to the following interactions with industry:

1. Interactions with medical students and housestaff
2. Gifts, meals and compensation, including off site interactions
3. CME activities
4. Provision of educational funds and scholarships to housestaff and medical students.
5. Pharmaceutical samples
6. Disclosure of relationships with industry, including regarding scholarly publications.
7. Curriculum for undergraduate medical student education and the training of housestaff regarding potential conflicts of interest in industry interactions.
8. Marketing of new pharmaceutical products, medical devices, and research equipment and supplies
9. Development of new medical devices and training for newly purchased devices

Items 1-7 will be specifically delineated below.

1. Interactions with medical students and housestaff:

Pharmaceutical and related biomedical industry representatives are prohibited from interacting directly with medical students or housestaff at any time on the grounds of the SOM or in any of its teaching hospitals. Furthermore, the SOM should not be used in any way as a vehicle for contacting medical students and house staff or marketing to them.

No element of the medical school curriculum or housestaff training program shall serve as a forum for distribution of gifts, or other promotional or educational items, or for encounters with pharmaceutical or biomedical industry representatives

Medical students and housestaff shall not be invited to industry-sponsored events by those involved in supervising, teaching, and/or evaluating them. This prohibition is not intended to preclude student or housestaff attendance at national meetings of professional societies or NYU Continuing Medical Education (CME) programs that may be funded with unrestricted educational grants from industry.

2. Gifts, Meals and Compensation to Medical Students and Housestaff, including off-site interactions:

All gifts or monetary compensation (zero dollar limit), free meals on or off-campus, alcoholic beverages, books, travel, tickets to sporting events, payment for time for travel to or time at meetings (except as indicated below), payment for participation in online CME from pharmaceutical, medical device companies, other biomedical industries and

their sales representatives are prohibited. Medical students and housestaff shall not be asked to accept gifts or compensation by those involved in supervising, teaching, and/or evaluating them. All faculty and medical center staff will follow the guidelines enumerated in the existing medical center policy on gifts or benefits from vendors, patients and others. (<http://www.med.nyu.edu/compliance/assets/GiftPolicy.pdf>)

3. CME Activities

Industry-sponsored events, including CME, shall not be required, nor substitute for, any portion of the formal undergraduate curriculum.

All CME activities at NYU Langone Medical Center adhere to ACCME Essential Areas and Policies, including the Standards of Commercial Support regarding industry support for continuing medical education. The specific policies are delineated at https://www.med.nyu.edu/cmecourses/assets/cme/commercial_support_policy.doc

4. Provision of Educational Funds and Scholarships to Medical Students and Housestaff:

Support of students and trainees by industry in the form of scholarships for training, reimbursement of travel expenses for educational meetings, and/or other non-research funding in support of scholarship or training must be free of actual or perceived conflict of interest and be in the form of an “unrestricted educational grant”. The following standards apply:

- A. For scholarships in training, the trainee must be selected by the NYUSOM program designated to receive the scholarship grant. There must be no quid pro quo for either the selected trainee or the program.
- B. Funds must be directed to the department/program/program designee and not to the individual trainee or student.
- C. For educational meetings or programs, the Dean, Program Director, or designee must agree to the educational merit of the program and specifically approve the financial support. The trainee/student must not be under a quid pro quo obligation to the industry.
- D. Industry-sponsored merit awards will be evaluated individually by the Associate Dean for Graduate Medical Education or Designee.

5. Pharmaceutical Samples

The provision of pharmaceutical samples to or by medical students or housestaff is prohibited.

6. Disclosure of Relationships with Industry, including regarding scholarly publications

- A. Medical students and housestaff are prohibited from publishing articles under their own names that are written in whole or material part by industry employees.
- B. In scholarly publications, medical students and housestaff must disclose their related financial interests in accordance with the International Committee of Medical Journal Editors (<http://www.icmje.org/>).
- C. Faculty with supervisory responsibilities for students or housestaff should ensure that the faculty's conflict or potential conflict of interest does not affect or appear to affect his or her supervision of the student, resident, trainee, or staff member. All faculty must report potential conflicts of interest annually as part of the existing medical center policy on conflict of interest (http://www.med.nyu.edu/compliance/assets/COI_Policy_and_Disclosure_June_2007.pdf). All faculty should disclose any conflicts of interest to medical students or housestaff as they relate to the curriculum or to patient care and management decisions.

7. Training of Students, Trainees, Staff, and Faculty Regarding Potential Conflicts of Interest in Industry Interactions:

The Undergraduate Curriculum shall contain a formal program aimed at providing medical students, at a minimum, these four elements:

- A. Recognition of the individual medical student and the individual medical practitioner's responsibility to avoid promotional activities of the Pharmaceutical Industry because of their distorting effect.
- B. Understanding of concepts and techniques for distinguishing between what is valid medical evidence and what is, in reality, product promotion.
- C. Instruction in how to identify and access the most reliable sources of medical and pharmaceutical information.
- D. Recognition that there is ample evidence that pharmaceutical industry promotional activities distort prescribing practices, resulting in problematic repercussions from the level of the individual physician-patient relationship to the health care system as a whole.

The GME Curriculum Committee will assist all training programs in developing specific curricula to insure that all housestaff receive adequate training regarding interactions with industry.

IMPLEMENTATION OF POLICY

- 1. A mechanism for student or housestaff reporting of any inappropriate contact with, or exposure to, pharmaceutical industry representatives or their materials shall be instituted. There shall be formal written assurances entered into the NYU SOM Student Handbook and relevant GME policies that there will be no negative repercussions for a student or housestaff reporting an inappropriate contact or event.
 - a. Students may make this report to the Dean for Undergraduate Medical Education (or other appropriate officer of the School of Medicine), and a mechanism shall be established for such reporting, with formal procedures

made explicit for the investigation of each report and correction of any infractions discovered.

- b. Housestaff should report violations of the policy or concerns about the policy to the Associate Dean for Graduate Medical Education, or designee.
2. Both this policy and the “NYU SOM/Medical Center/Hospitals Center Policy on Gifts” will be included in the NYU SOM Student handbook and explicitly explained during First Year and Clerkship Orientations.
3. This policy will be included as part of all GMEC policies which are distributed to house staff and training programs and will be updated as necessary on the GMEC Policy webpage.
4. Upon formal approval by the Undergraduate Medical Education Curriculum Committee, the Graduate Medical Education Committee, and the Dean of NYU SOM this Policy will go into effect. The specific mechanisms for reporting and dissemination described above shall be defined and put into effect at the earliest opportunity and at such time this policy should be amended to reflect these specifics. All vendors will be notified about the specifics of this policy by the administration of the School of Medicine and the NYU Langone Medical Center.