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Interactions with Industry Policy

Office of Accountability:	Dean’s Office
Office of Administrative Responsibility:	Vice Dean Faculty Affairs
Approver:	Faculty Council
Scope:	Compliance with this University policy extends to all faculty, staff, students and trainees of the Faculty of the Medicine and Dentistry whether onsite (University of Alberta and affiliated teaching hospitals or facilities) or offsite. This applies to both tenure track and clinical academic colleague faculty as well as to learners.

OVERVIEW

The primary objectives of professional and ethical interactions between the Faculty of Medicine and Dentistry (FOMD) and Industry should be the advancement of the health of patients through education, research, and training; and those interactions must maintain the patient’s and the public’s trust

The Faculty of Medicine & Dentistry has a long history of mutually beneficial relationships with industry. As examples, faculty members interact with industry on research grants and collaborations, technology transfer opportunities, consulting relationships, industry supported medical education events, and on delivery of clinical trials. Interactions may have a potential conflict of interest, but by itself, this is not a reason to avoid industry interactions. However it is important that these interactions are ethical and demonstrate the management of actual, potential or perceived conflicts of interest. Having a potential conflict of interest is not in itself a problem; failure to declare and appropriately manage potential conflicts is a problem. It will be noted that some policies are derived from College of Physician and Surgeons of Alberta (CPSA) Standard 38 or Canadian Medical Association (CMA) “Guidelines For Physicians In Interactions With Industry” and are so noted. In order to have a consistent policy for all, these same standards would apply to all members.

PURPOSE

The purpose of this policy is to ensure that the actions and behaviours of the members (faculty, staff, trainees and students) of the FOMD are free from commercial influence or appropriately managed in the presence of a potential conflict, based upon the best scientific evidence available. This will also provide guidance to our learners about professional and ethical behavior specific to interactions with industry. The policy does not replace the University’s Conflict of Interest and Commitment and Institutional Conflict Policy but supplements it.

POLICY

1. Gifts

Through gifts or research or educational grants, industry may support the educational, research, and patient care missions of the FOMD. Gifts or grants are given to the FOMD or organizational unit (see definitions).

Gifts to individuals

Members do not accept any personal gifts(including in the form of food) of any monetary or other value from industry. Members need to be aware of potential influence or bias that exists or may be perceived by others, in accepting personal gifts of any monetary or other value from industry. While gifts, by definition are bestowed voluntarily and without compensation, there may expectations on the part of the giver that need to be recognized. Members should be aware that acceptance of gifts has been shown to influence clinical decision making and fosters a relationship between members and the gift giver. Members must keep in mind the standards of the CPSA: 38.12 A physician must not accept any personal gift of any monetary or other value from industry; 38.4. A physician must always maintain professional autonomy and independence in any relationship with industry.

2. Industry samples

Samples provided to patients are free or if on a cost-recovery basis, the cost of which must be demonstrable to the patients

(CPSA Standard 38:11) When considering the use of clinical evaluation packages such as samples of medications or devices a member:

- (a) recognizes the influence on the member's prescribing choices,
- (b) uses appropriate clinical evidence to determine the choice of medication or device,
- (c) documents the type and amount of medication or device in the patient record, and
- (d) does not receive any form of material gain based on the choice of the product.

3. Site access by industry representatives

Access by industry representatives to individual physicians is restricted to non-patient areas, where an acceptable level of privacy can be achieved for a professional dialogue and occurs with the prior consent of the physician. The exception would be where Industry assistance is needed for patient care reasons and access in AHS facilities would be as per AHS policy.

Meetings between industry and students and trainees only occur for educational, not marketing, purposes and under supervision of a faculty member.

Access to AHS patient care areas or AHS patient care interactions by industry representatives should be permitted only when properly approved by Alberta Health Services (AHS) as per the policy "Vendor Guide to Doing Business with Alberta Health Services".

4. Continuing Medical Education (CME)

FOMD affirms the following from the CMA guidelines:

The primary purpose of CME activities is to address the educational needs of physicians and other health care providers in order to improve the health care of patients.

The ultimate decision on the organization, content and choice of CME activities for members are made by the member organizers.

All funds from a commercial source are in the form of an educational grant payable to the organizational unit sponsoring the CME activity.

Industry representatives are not members of CME content planning committees.

Note that RCPSC Maintenance of Certification Section 1 accredited programs meet the above criteria.

A member does not conduct a seminar or similar event directly or indirectly for industry that promotes a product for the purpose of enhancing the sale of that product (CPSA standard 38:7b),

Any educational or public presentation delivered by a member of the FOMD must include a full Conflict of Interest Declaration (CPSA 38:7a). See FoMD approved conflict slide <http://www.med.ualberta.ca/-/media/medicine/CPL/Accreditation/Conflict-Interest.pdf>

5. Participation in industry-sponsored programs

A member attending a continuing professional development event does not accept payment or reimbursement for expenses from industry unless they are in the employ of the industry or are directly involved in the presentation of the professional development activity. (CPSA standard 38:10),

A presenter who prepares and presents a substantive educational session in an area where they are a recognized expert or authority may accept reasonable honoraria and reimbursement for travel, lodging and meal expenses. (CMA Guideline Item #33)

6. Industry sponsored scholarships and other educational funds

Industry sponsored scholarships or other educational funds are given to an organizational unit. The evaluation and selection of scholarship recipients is the responsibility of the organizational unit with no involvement by the industry donor.

7. Food

Food as a gift is not accepted by members directly from industry on-site or off-site.

Financial gifts or grants to the organizational unit may be used in part to provide food; however, the decision to use funds to provide food is made at the sole discretion of the organizational unit.

8. Professional travel and advisory boards

Members do not accept travel funds from industry other than for legitimate payment for contractual services.

For advisory boards and other paid services: the exact deliverables of the arrangement should be clearly set out and put in writing in the form of a contractual agreement. For advisory boards, the purpose of the arrangement should be exclusively for the member to impart specialized medical knowledge that could not otherwise be acquired by the hiring company, and should not include any promotional or educational activities on the part of the company itself. Members who participate in advisory boards or provide other paid services should declare this as a potential conflict of interest when giving presentations. (CMA guideline item #41)

9. Ghostwriting

Professional presentations (oral or written) are not ghostwritten by any party, industry or otherwise.

10. Purchasing

Purchasing decisions adhere to the University of Alberta Conflict of Interest and Commitment and Institutional Conflict and/or the AHS policy "Vendor Guide to Doing Business with Alberta Health Services".

11. Content violation of educational events

If members attend a FoMD educational event that they believe should, but does not meet FOMD ethical standards, it should be referred to the head or director of the appropriate administrative or academic unit. If the involved individual is the administrative head of an academic or administrative unit, the matter should be referred to the person to whom that individual reports.

For the first instance of an inadvertent failure to comply with this policy, the involved individual(s) will be reminded of their obligation to comply with the policy. In the case of repeated or deliberate failure to comply with this policy, the matter will be reviewed in accordance with FoMD and University policies on staff conduct or professional misconduct.

12. Research compensation

It is acceptable for members to be compensated for the time involved in enrolling patients or participating in approved research studies. This remuneration should not constitute enticement, but is meant to replace potential lost income of the investigator as a result of the enrollment process. If there is no potential loss of income with enrollment, remuneration would not be expected. Research subjects must be informed if the members will receive a fee for enrolling them in a study as per Research Ethics Board requirements.

13. Acknowledgement of industry support

With any gift or grant, organizational units publicly acknowledge the support of specific companies as long as the acknowledgement is not tied to a particular product. When a company supports a particular lecture or educational event in accordance with this policy, the support is disclosed and acknowledged in connection with the event.

DEFINITIONS

Any definitions listed in the following table apply to this document only with no implied or intended institution-wide use. [▲Top](#)

Gift	Something that is given voluntarily and without compensation
Grant (Educational or Research)	Money usually applied for and given for an educational or research purpose with agreed upon terms for use.
Industry	is defined as a commercial entity involved in the production, marketing, reselling, or distributing of health care goods or services consumed by, or used on, patients. Industry includes, but is not limited to pharmaceuticals, devices, equipment, and direct health/sciences related industry.
Member	Any faculty, staff, student and trainee that has an appointment from or is employed by the Faculty of the Medicine and Dentistry
Organizational unit	Any of: center, institute, division, department, faculty, AHS or hospital organizational unit, or nonprofit organization such as a specialty society

RELATED LINKS

Recommendations taken from Association of American Medical Colleges, Industry Funding of Medical Education: Report of an AAMC Task Force. June 2008.
https://services.aamc.org/Publications/showfile.cfm?file=version114.pdf&prd_id=232&prv_id=281&pdf_id=114

CMA Policy, Guidelines for Physicians in Interactions with Industry, 2007. <http://policybase.cma.ca/dbtw-wpd/Policypdf/PD08-01.pdf>

Standards of Practice of the College of Physicians & Surgeons of Alberta. Relationships with Industry Standard 38

The following AHS policies can be accessed on the Alberta Health Services website [Home | Alberta Health Services](#) under the section "About AHS".

- AHS Conflict of Interest Bylaw
- AHS Code of Conduct
- Vendor Guide to Doing Business with Alberta Health Services

University of Alberta Conflict Policy--Conflict of Interest and Commitment and Institutional Conflict
<https://policiesonline.ualberta.ca/PoliciesProcedures/Pages/DispPol.aspx?PID=105>

FOMD conflict declaration slide <http://www.med.ualberta.ca/-/media/medicine/CPL/Accreditation/Conflict-Interest.pdf>

Canada's Research Based Pharmaceutical Companies (Rx&D) Code of Ethical Practices
<http://www.canadapharma.org/en/commitment-to-ethics/with-healthcare-professionals/code-of-ethical-practices>