

Policy 10.1.11 Guidelines for Interactions Between Clinicians and Researchers With Industry	Revised: November 2015 Responsible Party: Vice President for Research
---	--

decision making is not compromised by financial or other personal relationships with industry. The guidelines are intended to meet this goal by setting standards for the interactions of Health Science Center clinicians and researchers with representatives of industry, primarily the pharmaceutical clinical device, laboratory equipment, and supplies sectors. The guidelines apply to all Health Science Center clinicians and researchers at both faculty and training levels.

Industry plays a vital role in drug discovery, technology development, and improving the public health. The Health Science Center is eager to promote a mutually beneficial relationship with industry, one that facilitates discovery and evidence-based use of medications and devices and is characterized by the highest professional standards of ethics and integrity. These guidelines specifically seek to preserve and fortify the autonomy of our faculty and trainees, ensure that we incorporate the most objective information in the care of our patients, and the performance of research, reduce the potential for real or perceived bias in our programs of clinical care, research and education, and ensure compliance with the law. The complexities of relationships with industry preclude the identification of all specific circumstances in wh

and

research, the appearance of such conflicts, and statutory violations.

Clinical Practice
Sites

Health Science Center clinicians carry out their clinical and academic activities in multiple venues. The interpretation of the guidelines may be

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
Section 10.1	Ethics, Standards of Conduct and Relationships with External Entities	Revised:	November 2015
Policy 10.1.11	Guidelines for Interactions Between Clinicians and Researchers With Industry	Responsible Party:	Vice President for Research

specific by site. All guidelines apply fully and precisely as stated when the clinician is present in the facilities of the Health Science Center, including leased space and facilities operated by UT Medicine. When faculty are present in the facilities of a Health Science Center affiliate (e.g. University Health System, South Texas Veterans Health Care System, Christus Santa Rosa Health Care), they should abide by the guidelines of either the Health Science Center or the affiliated organization, whichever is more strict with respect to the particular

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
Section 10.1	Ethics, Standards of Conduct and Relationships with External Entities	Revised:	November 2015
Policy 10.1.11	Guidelines for Interactions Between Clinicians and Researchers With Industry	Responsible Party:	Vice President for Research

RESEARCHER(S): Means any faculty member and all others, including trainees at all levels, who are engaged in any area of basic, translational, clinical, epidemiologic, health services, or community-based research.

Policy

Specific Prohibited or Regulated Activities

1. Provision of compensation or gifts from industry to Health Science Center clinicians or researchers
 - a. Health Science Center clinicians or researchers may not accept any form of personal gift from industry or its representatives;

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
Section 10.1	Ethics, Standards of Conduct and Relationships with External Entities	Revised:	November 2015
Policy 10.1.11	Guidelines for Interactions Between Clinicians and Researchers With Industry	Responsible Party:	Vice President for Research

- d. Health Science Center clinicians or researchers may not accept compensation for listening to a sales pitch (e.g., detailing) by an industry representative;
- e. Health Science Center clinicians or researchers may not participate in or receive compensation for papers or speeches that were ghostwritten by individuals employed or retained by industry;
- f. Health Science Center clinicians or researchers who are simply attending a CPE or other instructional activity and are not speaking or otherwise actively participating or presenting at the meeting, should not accept compensation from companies for either attending or defraying costs related to attending the meeting;
- g. Health Science Center clinicians must consciously and actively divorce clinical care decisions (including referrals and diagnostic or therapeutic management) from any perceived or actual benefits accrued or expected from any company (including but not limited to personal gifts, research funding, scholarships for CPE attendance, consulting agreements, and the like);
- h. Health Science Center clinicians or researchers who are involved in institutional decision making concerning the approval or purchase of medications, devices, or equipment, or the negotiation of other contractual relationships with industry, must not have any financial or personal interest (e.g., equity ownership, compensated positions on advisory boards, a paid consultancy or other forms of compensated relationship) in companies or their employees that might benefit from the institutional decision. This provision is not intended to preclude the indirect ownership, through mutual funds or other investment vehicles, of equities in publicly traded companies by Health Science Center faculty;
- i. Health Science Center clinicians may not receive any form of

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
Section 10.1	Ethics, Standards of Conduct and Relationships with External Entities	Revised:	November 2015
Policy 10.1.11	Guidelines for Interactions Between Clinicians and Researchers With Industry	Responsible Party:	Vice President for Research

- c. The school, department, division, or program has determined that the conference or training experience has educational merit;
 - d. The recipient of the funds is not subject to any implicit or explicit quid pro quo (i.e., “no strings are attached”).
3. Provision of free drug, device, and other product samples to clinicians
- a. Health Science Center clinicians may accept free drug, device, or other product samples from industry only for distribution to patients;
 - b. Health Science Center clinicians should use discretion in the distribution of non-formulary drugs to patients, balancing the potential benefits (particularly for indigent patients) against the possible encouragement of the use of costlier medications;
 - c. Free drug, device, or other product samples must not be sold;
 - d. Free drug, device, or other product samples should not be used by Health Science Center clinicians or researchers for themselves or family members;
 - e. Free device samples intended for student skills practice sessions (e.g., suturing kits) should not be provided directl BT /

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
Section 10.1	Ethics, Standards of Conduct and Relationships with External Entities	Revised:	November 2015
Policy 10.1.11	Guidelines for Interactions Between Clinicians and Researchers With Industry	Responsible Party:	Vice President for Research

-
- f. Product promotion material and product-specific advertisements of any type are prohibited in or during CPE activities. The juxtaposition of editorial and advertising material on the same products or subjects must be avoided. Live (staffed exhibits, presentation) or enduring (printed or electronic advertisements) promotional activities must be kept separate from CPE;
 - g. A commercial interest is not used as the agent providing a CPE activity to learners, e.g., distribution of self-study CPE activities or arranging for electronic access to CPE activities;
 - h. The content or format of a CPE activity or its related materials must promote improvements of quality in health care and not a specific proprietary business purpose of a commercial interest;
 - i. Attendees in the audience are not compensated or otherwise materially rewarded for attendance (e.g., through payment of travel expenses, lodging, honoraria, or personal expenses);
 - j. No gifts of any type are distributed to attendees or participants before, during, or after the meeting or lecture;
 - k. Funds to pay for the specific educational activity are provided to the school, department, division, or program and not to an individual clinician;
 - l. The CPE Office of the appropriate Health Science Center School maintains oversight of the event to assure implementation of the established standards of the appropriate accrediting organization.
5. Guidelines for delivering industry-sponsored lectures or participating in legitimate conferences and meetings of clinicians or researchers in locations other than Health Science Center facilities

Clinical meetings and scientific conferences sponsored by professional societies frequently derive a portion of their support from industry. Such sponsorship may give rise to inappropriate industry influence on the content of the conference or its attendees.

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10 Section 10.1	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
----------------------------	--	------------	--------------

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 10	Ethics, Standards of Conduct, and Relationships with External Entities	Effective:	January 2008
Section 10.1	Ethics, Standards of Conduct and Relationships with External Entities	Revised:	November 2015
Policy 10.1.11	Guidelines for Interactions Between Clinicians and Researchers With Industry	Responsible Party:	Vice President for Research

