

Policy Title	Resident Vendor Interaction
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POLICY	
PURPOSE	The purpose of this policy is to establish guidelines for resident interactions and relationships with vendors in educational contexts, including at all clinical training sites. The policy is developed to meet the institutional requirements promulgated by the ACGME so that residency training programs are not compromised through vendor influence.
SCOPE	<p>The policy applies to all MHS-sponsored GME residency training programs, both accredited and non accredited. The term "resident" refers to all medical graduate trainees (interns, residents, fellows) in all postgraduate GME training programs sponsored by MHS.</p> <p><i>Note:</i> In addition to being subject to specific policies and procedures required by all applicable accrediting bodies, GME Residents are also subject to policies and procedures applicable to MHS employees generally and enjoy those benefits of employment applicable to MHS employees of comparable classification.</p>
ACRONYMS	<p>ACCME — Accreditation Council for Continuing Medical Education ACGME — Accreditation Council for Graduate Medical Education AMA — American Medical Association CAO — Chief Academic Officer CMO (H) — Chief Medical Officer of individual hospitals in MHS CMO (S) — Chief Medical Officer of MHS CPME — Council on Podiatric Medicine DIO — Designated Institutional Official GMEC — Graduate Medical Education Committee MHS — Memorial Healthcare System OAA — Office of Academic Affairs PD — Program Director RRC — Resident Review Committee</p>
DEFINITIONS	<p>Gift — An item of value given without explicit expectation of something in return.</p> <p>Vendor — A vendor is any person acting as an agent of an entity, the entity for which a person is acting as an agent, and any person acting on his/her own behalf who visits MHS premises, contacts MHS, and/or corresponds with MHS for the purposes of marketing, selling, or promoting utilization and the exchange of goods and/or services to MHS medical staff members or MHS employees. This includes, but is not limited to, pharmaceutical, supply, equipment, and other sales representatives, regardless of whether they presently hold contracts with MHS.</p>
PROCEDURES	<p>Residents participating in MHS training programs must minimize contact with vendors so as to avoid conflicts of interest. In accordance with the guidelines established by the AMA's Gifts to Physicians from Industry code of ethics, acceptance of gifts from vendors is prohibited.</p> <ol style="list-style-type: none"> MHS residents may not accept gifts, regardless of value, for themselves or on behalf of MHS, individually or as a group, from any vendor or manufacturer of a healthcare product or from the representative of any such vendor or

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	<p>manufacturer.</p> <ol style="list-style-type: none"> 2. Residents shall not accept gifts or compensation for prescribing or changing a patient’s prescription. 3. Residents may not make patient care decisions that are influenced by the possibility of personal financial gain. 4. In the event that a resident is contacted directly by a vendor, the resident will contact the program director to report the interaction. It will be the responsibility of the program director to document and determine the appropriate course of action. 5. Vendor support of educational activities involving residents will be considered on a case by case basis by the GMEC. No residency program will have the authority to accept vendor support independent of the GMEC. 6. Vendor support may be permitted on the condition that the funds are provided to the institution and not directly to the trainee. Vendor sponsorship of GME educational activities should take place under unrestricted grants. Financial support by industry vendors must be fully disclosed by the sponsor during the educational activity. All GME educational activities that also have associated continuing medical education credits must meet all ACCME guidelines and criteria. 7. Vendors may orient, train, and advise residents on the proper use or calibration of a product that has already been acquired for use by MHS. In such cases, the vendor will be appropriately identified as such so that the vendor is not mistaken for a clinician. The vendor will act as a consultant of the product and must solely advise on the specific device. He/she is not permitted to market any other products. 8. Residents must follow all MHS compliance and vendor policies which are applicable to all employees of MHS, including the MHS Business Ethics and Conflicts of Interest Policy.
REFERENCES	<p>ACGME Institutional Requirements, effective July, 2018 ACGME Common Program Requirement, effective July 2020 ACGME Program Specific Requirements – most recent as per RRC specialty</p> <p>AMA’s Gifts to Physicians from Industry code of ethics MHS Business Ethics and Conflicts of Interest Policy MHS Gifts / Gratuities</p>
ORIGINAL ISSUE DATE	July 21, 2017
REVIEW/REVISION DATES	June 2020
POLICY OWNER	Office of Academic Affairs

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	<p>If any of the statements contained in this policy conflict with any verbal statements or agreements made by any representatives of MHS, then the statements contained in this policy shall control the outcome of any such conflict.</p> <p>Memorial reserves the right to modify this policy in whole or in part, at any time, at the discretion of the Healthcare System or as required by applicable law, regulation, or governing/accrediting body.</p> <p>Employees who have questions regarding information contained in this policy should contact the Office of Academic Affairs.</p> <p>This policy is intended to supplement standard MHS Human Resources (“HR”) policies. To the extent that this policy conflicts with any MHS HR policy, the standard HR policy shall govern and control.</p>
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