College of Veterinary Medicine

WASHINGTON STATE UNIVERSITY

Healthcare Vendor Relations Policy
College of Veterinary Medicine Guidelines

Date: 05/19/2021, updated 12/29/2021, 6/01/2023*
Status: Final

This policy addresses the potential for inappropriate influence by commercial interests on the educational content of programs hosted by or held within the College of Veterinary Medicine for students and the public. The policy should be viewed as in addition to, and does not supersede, any Washington State University (WSU) policies or procedures on conflict of interest. The CVM recognizes that identification and/or disclosure of a potential conflict of interest does not necessarily mitigate the potential for inappropriate influence. Disclosure does, however, create transparency for any possible conflict of interest and allows the learner to be fully informed of those relationships.

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 are pharmaceutical companies, medical supply companies, and pet food companies.

This policy applies to both on-campus and off-campus activities.

1. Gifts and Compensation Provided by Healthcare Vendors

a. Healthcare vendors may make unrestricted monetary donations to the university. Vendors may not directly provide food or any other gifts to individual university employees or students. Vendors may provide funds to purchase food for students for certain events with restrictions (see sections 1.h, 1.i, and 5).

b. Exclusions from the definition of a gift are items provided at a discount or free as part of a research project, and prizes or awards from *bona fide* competitions.

c. Healthcare vendors may be invited to speak at specific program events, however any unrestricted monetary donations made by the vendor may not be tied specifically to a particular speaking engagement.

d. It is acceptable for healthcare vendors to pay the university a specified sum to set up a booth at a university event. Items of nominal value such as pens and notepads (see RCW

42.52.140) 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 giveaway items are made available to participants in a manner whereby all participants have an equal opportunity to receive the item.

e. Raffles cannot be authorized or permitted by the college (a raffle is an event where tickets are sold, and prizes are awarded based on those tickets).

f. 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. Any donations/unrestricted gifts made by the vendor may not be tied specifically to travel expenses to events sponsored by the vendor. Vendors may compensate faculty members for travel and effort associated with evaluation of vendor products or services via a research or consulting agreement (note that an agreement can be as simple as an email). Faculty members are required to adhere to the rules within the Faculty Manual regarding Ethics in Public Service.

g. Healthcare vendors may donate, or provide at a discount, their product to a unit of the WSU CVM if the administrative head of the unit approves the donation. Acceptance of donation or discounts does not constitute exclusive use or product endorsement.

h. Student clubs arranging events or meetings with healthcare vendors must adhere to this policy. Vendors may not provide gifts to individual students. Vendors may provide funds directly to a club to cover all or part of the cost of food for an event, subject to the following restrictions:

    i. The purpose of the event must be educational in nature. Vendors may not provide food for events to market their own products.
    ii. Vendors may provide up to a maximum of a $12.50 food allowance per student attending the event. Vendors may not purchase food directly. Funds must be deposited in the club's RSO account; funds may not be paid to an individual student. Clubs are responsible for documenting attendance at the event.
    iii. Vendors may provide funds for the purchase of food for a maximum of two educational events per semester and a maximum of 75 attendees per event.
    iv. Provision of funds toward the purchase of food for an event shall not provide exclusive access for a vendor. Clubs hosting events may receive funds from more than one vendor.
    v. An acknowledgement of support from vendor(s), such as a banner with the name(s) or logo(s) of the vendor(s), may be displayed at club events.

i. Speaking opportunities will be opened to healthcare vendors to provide them a forum for interacting with CVM students. Vendors may not provide food for events that are primarily promotional in nature. Vendors may provide food for educational events that do not include marketing materials, subject to the limit of $12.50 per attendee and a total of two events per semester, <u>including</u> events hosted by student clubs. A vendor representative or speaker may bring a banner or display showing the organization they represent.

j. Events providing products or services solely for students' pets will not be allowed. Likewise, healthcare vendor products or services may not be sold with proceeds going to student clubs except for pet food sales managed by SAVMA described in section 4.

2. Continuing Education

Policies currently in place have been developed based on the Accrediting Council for Continuing Medical Education (ACCME) Standards for Commercial Support (https://www.accme.org/accreditationrules/standards-for-commercial-support) and meet the requirements of this policy. Below are the key provisions of the ACCME Standards, including interpretations pertinent to veterinary CE and public education programs involving the CVM.

a. The following decisions are to be made by the CVM faculty:
   - Identification of CE needs
   - Determination of educational objectives
   - Selection and 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

b. 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.

c. The CVM will not accept "sponsorships" from commercial industry or other educational partners for continuing education programs; however, the CVM can accept ***educational grants/donations*** that explicitly provide no "quid pro quo" relative to the topics or speakers:
   i. The terms, conditions, and purposes of support from commercial sources will be documented in writing;
   ii. Educational grants/donations to support events, including meals or special presentations on specific products, can be accepted but must be clearly separated from the continuing education program to maintain independence of CE programs from commercial interests;
   iii. Social events or meals will not compete with or take precedence over the continuing education activity;
   iv. Honoraria and expenses will be paid by the CVM and are not to be sourced directly from a commercial or non-commercial educational partner; and,
   v. 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 other university personnel involved in planning, organizing and conducting the CE program.

d. 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.

e. Product-promotion material or product-specific advertisement must be kept separate from continuing education activities:
    i. No product-specific promotional information is allowed in the syllabus or CE handouts.
    ii. No product-specific promotional information is allowed in the room with the CE program.

f. Disclosures
    i. 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 CVM's Continuing Veterinary Medical Education office like that required of speakers.
    ii. 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 their intellectual property and allowing the university to use the property limited to the specific program involved.

3. Vendor Activities in the Veterinary Teaching Hospital

a. Pharmaceutical purchases are directed by the Chief Pharmacist, based on pricing and efficacy, with direction from the clinical faculty.

b. All healthcare vendors who present to the VTH 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.

4. Pet Food Donations and Sales

a. The Student American Veterinary Medical Association (SAVMA) may purchase pet foods from companies at a discount and resell on site to veterinary students or CVM employees as a fundraiser. This is acceptable if all companies are given the opportunity to participate. SAVMA is responsible for managing inventory and distribution.
b. SAVMA may also, as a fund raiser, facilitate on-site distribution of pet food sold to students or CVM employees in exchange for compensation. The terms and amount of such compensation must be approved in advance by the CVM. All companies must be provided a similar opportunity. SAVMA is responsible for managing receiving, storage, and delivery of all products.

c. Pet food may be donated or sold at a discount to the VTH under the direction of the clinical faculty. All companies are provided the same opportunity to participate, and there will be no expectation from the companies that these donations will lead to recognition or recommendations to clients.

5. It is permissible under this policy for vendors to employ student representatives. Student representatives are expected to comply with this policy.

a. Student representatives may facilitate sales of discounted products from their company if all aspects of the sales and deliveries are conducted off-site and without the use of state resources, and if the discount is not limited to WSU CVM. That is, the discounted products must also be available to members of the veterinary profession generally or other colleges of veterinary medicine.

b. Student representatives may use the CVM email distribution lists for students and employees ONE time per semester to solicit participation in their respective program. All subsequent communications and transactions should be conducted without use of state resources.

c. Student representatives may organize educational events with provision of food for student attendees, subject to the limit of $12.50 per attendee, 75 attendees per event, and a total of two events per semester, including events hosted by student clubs. Student representatives may also organize events which are primarily promotional in nature, in conjunction with educational events or separately, but no food may be provided at such events.

*6/1/2023: increased food cost limit from $10 to $12.50.