

POLICY ON VENDOR INTERACTIONS

PURPOSE:

This policy addresses Accreditation Council for Graduate Medical Education (ACGME) *Institutional Requirements IV.L. Vendors*:

The Sponsoring Institution must maintain a policy that addresses interactions between vendor representatives/corporations and residents/fellows and each of its ACGME- accredited programs. (Core)

DEFINITIONS:

See the *NSU Graduate Medical Education Glossary of Terms* dated April 1, 2021; the *ACGME Glossary of Terms* dated April 15, 2020; as well as the *Common Acronyms/Abbreviations Used in Graduate Medical Education* last updated April 4, 2019.

BACKGROUND:

On occasion, vendors, contractors, patients or others may offer gifts or gratuities to employees of NSU. All such offerings represent a potential for conflicts of interest, or the appearance of such, on part of the employee and NSU. Such gifts and gratuities are not part of NSU's operational environment. As such, the acceptance of such gifts and or gratuities would constitute a risk to the integrity of NSU and its employees.

In addition, pharmaceutical and medical device companies may use non-monetary gifts, financial compensation, personal visits, educational events, and other strategies in an attempt to influence prescribing or other medical practices.

POLICY:

All GME personnel, including program directors and trainees, must abide by the:

- NSU Conflict of Interest - Declaration & Disclosure Policy in the NSU Employee Policy Manual - found at: nova.edu/portal/hr/policies/conflict-of-interest.html (must log in to NSU employee portal to access)
- NSU Financial Conflict of Interest with Respect to Sponsored Projects in the NSU Employee Policy Manual - found at: nova.edu/portal/hr/policies/financial-conflict-of-interest-sponsored-programs.html (must log in to NSU employee portal to access)

Additionally, all GME personnel, including program directors and trainees, must abide by the NSU-COM Policy on Conflicts of Interest and Healthcare Industry Policy found in the NSU-COM Faculty Handbook and included with this document.

PROCEDURE:

- A. All residency programs will develop specific educational methods (lectures, modules, etc.) to address and instruct trainees on the ethical obligations that govern physician-vendor relationships.
- B. All NSU employees (including trainee physicians) must know and abide by the NSU Conflict of Interest policies.
- C. All trainee physicians and residency programs will be aware of and follow the vendor interaction policies in any facility where they rotate. Trainees will also be aware of and follow vendor interaction policies at any outside facilities in which they rotate.

Initial Approval by GMEC on July 7, 2017

Second Approval by GMEC on June 26, 2018

Reviewed and Approved by GMEC on April 8, 2021