



**USF Health - Morsani College of Medicine
GME POLICY & PROCEDURE**

Title: Vendors and/or Industry Relations Policy	GME-314
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Scope: Applies to all University of South Florida Morsani College of Medicine ("USF MCOM") residents and fellows ("Residents") in Accreditation Council for Graduate Medical Education ("ACGME") accredited and non-accredited/non-standard programs as appointed through the House Officer Contract issued by the USF MCOM Graduate Medical Education Office ("GME Office").

Background: Relationships with outside entities are vital to USF MCOM's mission to advance health through research, education, clinical practice, and community partnerships.

The USF MCOM Graduate Medical Education program recognizes that, inherent to this relationship, there is the possibility of conflict of interest or apparent conflict of interest in interactions with corporations, representatives of corporations, or other individuals supported by corporations. At the same time, USF MCOM recognizes that several medically related industries provide legitimate and appropriate support for educational activities.

Policy: The USF MCOM Graduate Medical Education program follows the [USF Systems policy USF 9.019](#), concerning vendor interactions and adheres to the guidelines as referenced below.

[USF 9.019](#) identifies potential, real or perceived outside interests that may be viewed as a conflict and appropriately manages such conflicts in interactions with the Pharmaceutical, Medical Service, and Biotechnical Industries. This overarching policy provides guidance regarding conflicts of interest and is intended to supplement, but not replace, state and federal laws governing conflicts of interest for nonprofit and charitable organizations.

The University recognizes that its affiliated hospitals have their own specific policies regarding corporations and vendors, and the University will actively support and enforce these policies. Where a conflict exists between this policy and that of another organization, it is the overarching policy of USF MCOM that the stricter or more stringent policy will apply to a given situation within that organization.

The following areas are addressed and further defined in the attached:

- Gifts and Individual Financial Relationships with Industry
- Meals
- Consulting Relationships

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- Industry Funded Speaking Relationships
- Disclosure
- Pharmaceutical Samples and Devices
- Purchasing and Formularies
- Restrictions on Industry Representatives
- Purchasing and Formularies
- Education
- Relations with Industry Representatives in Publications
- Medical School Curriculum
- Enforcement and Penalties
- Annual Review and Revision

Procedure

Responsible Party

GME Responsibility

Program Director

GME Community

Action

Ensures compliance with the attached regulations as defined for USF Health Community Members, which includes Residents.

Program leadership should be aware of and discuss with Residents any interaction with representatives from vendors to ensure that any contacts are within the scope and spirit of this policy. Interactions that appear to place the resident in a position of obligation to, or influence by, the vendor should be explicitly discouraged. Programs should provide training to residents on vendor relations and conflicts of interest, including reference to this policy and other relevant institutional and affiliate policies. The Program Director must communicate this policy to trainees as part of program orientation, and reinforce it through inclusion in program handbooks and other information sites for Resident reference.

When in doubt about right or appropriate action, contact your supervisor, Department Chair or Division Director, as applicable, call the USF Helpline at (813) 974-2222 or visit the USF Health Professional Integrity Office website. Promptly report any possible violations of law or improper activity to a supervisor or call the Helpline at (813) 974-2222.

APPROVED:



Senior Associate Dean, Graduate Medical Education/DIO

Date of Origin	Effective	Revision/GMEC Approval:	Originally Policy #
08/2008	08/2008	03/2012; 12/2019	N/A