Children's National

INSTITUTIONAL GRADUATE MEDICAL EDUCATION POLICY

SUBJECT: Conflicts of Interest and Vendor Interactions with Trainees	**DATE EFFECTIVE:** May 8, 2024
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I. PURPOSE:

Children's National Hospital (CH) Graduate Medical Education (GME) adheres to the principle that the involvement of faculty, administrators, division chiefs, trainees, and students in the exchange of ideas and knowledge with outside organizations may help advance the science and delivery of medicine. CH is committed to the development of drugs, biologics, and devices for the benefit of patients. Discovery, safety, efficacy evaluations, and appropriate clinical use of products require collaboration among academic institutions, government, and industry. The objective of CH GME is to recognize the ideological differences between academia and industry, and to facilitate interactions with industry in a transparent manner that minimizes real and perceived conflicts of interest.

This CH GME Policy on Conflicts of Interest (Policy) does not replace or supersede CH Policies on Conflicts of Interest (C-14) or Vendor Management (CH:FI:18). The purpose of this Policy is to provide guidance to CH GME faculty, administrators, division chiefs, trainees, and medical students regarding the acceptable parameters of provider/industry interactions as they relate to clinical care and interaction with industry, and to establish CH GME procedures for evaluating and managing clinical conflicts of interest. For purposes of this Policy, the term "Industry" shall include biomedical, pharmaceutical, medical device and other companies that make products or provide services used for the provision of health care.

This institutional policy ensures interactions between vendor representatives/corporations and any Trainee at Children's National Hospital (CH) occur in a manner that maintains a safe and private environment for our patients, families, and staff while allowing for a mutually beneficial relationship with our vendors and potential suppliers.

II. POLICY SCOPE:

All Accreditation Council for Graduate Medical Education (ACGME) accredited and non-ACGME residency and fellowship programs sponsored by CH.

III. DEFINITIONS:

Trainee
Trainee refers to interns, residents and fellows participating in ACGME-accredited and non-ACGME training programs sponsored by CH.

Training Program
Training program or program refers to an ACGME-accredited or non-ACGME internship, residency or fellowship training program sponsored by CH.

Vendor
Any person or entity or representative thereof that has or is seeking to enter into a business relationship with CH to provide any equipment, supply, facility, item, or service for payment, including but not limited to medical or office supplies, furniture, medical devices, pharmaceutical products, clinical services, consulting, and maintenance services.

IV. GUIDING PRINCIPLES

CH GME endorses the principles published by the AAMC regarding the interactions between academic medical institutions and industry as set forth below:

- The interactions should serve to enhance the public health.
- The interactions should be transparent.
- All the interactions between academic medical centers and industry must reflect high standards of medical professionalism that reach beyond applicable laws and regulations.
- The interactions should be reciprocal, with knowledgeable parties on both sides of the interactions.
- The interactions should support and enable the free exchange of information in appropriate settings in a manner adherent to applicable law and consistent with the standards of medical professionalism. Interactions should also be consistent with additional standards that may be established to assure that exchanges of information are evidence-based and free of bias to the maximum possible extent.
- The interactions must serve both academic medicine and the legitimate missions of industry. Compensation structures and arrangements should be consistent with the foregoing principles.

V. POLICY:

A. Vendor Solicitation

i. All vendor solicitations of donations or gifts should be coordinated through the Children's National Hospital Foundation in order to ensure consistency with CH's strategic direction and philanthropic goals and compliance with applicable state and federal laws. See Vendor Management Policy CH:FI:18
ii. All Trainees should interact with vendors in a manner that is legally and ethically compliant, avoids or minimizes conflicts of interest, and promotes fair and open dealings.

B. Vendor Gifts & Educational Programs

i. Children's National faculty, staff, students, and trainees should not accept more than modest meals or social activities in connection with industry-sponsored educational programs. Funding cannot be accepted to support social activities that do not have an educational component. Industry funding may not be accepted to support the costs of internal department meetings, retreats, or social events.

C. Vendor & Industry Representative Access

CH GME faculty, division chiefs, and administrators may meet with Industry representatives on campus, provided the meeting adheres to aforementioned CH Policies and each of the following requirements is satisfied:

i. While on CH premises, vendors must wear the Children's Vendor Identification Badge.
ii. Meetings that are promotional in nature shall occur in a faculty office or conference room and not in a clinical area.
iii. Vendors and sales representatives may not have access to patient care areas except by special arrangement in advance.
iv. Industry representatives are not permitted to meet with students or trainees unless there is a faculty member present.
v. A supervising faculty member or departmental/divisional representative will accompany or otherwise monitor vendors who have been given access to department or patient care areas.

D. HIPAA Agreements

In situations where vendors have been approved for access to patient areas, the vendors must read the Children's Hospital Non-Employee HIPAA Training material and sign a Confidentiality Agreement in advance of access.

E. Samples

Medication and medical equipment samples may only be accepted by CH GME programs when all requirements of the aforementioned CH Policies have been met.

F. Personal Gifts

CH GME trainees and faculty shall not accept personal gifts or entertainment (including travel), regardless of value, from Industry. Unsolicited, non-branded, and general use gifts that have an educational value and are for the benefit of patient care or health education are not considered personal gifts and may be accepted on behalf of a CH GME Program if adherence to CH Policies

named above is strictly followed. Examples include books, anatomic models, illustrations, and clinical diagrams, provided they are not solely for a specific individual recipient's benefit. By contrast, a stethoscope given by an industry representative or vendor to a specific individual would be considered a personal gift and may not be accepted.

Referenced Children's National Hospital Policies:
Corporate Compliance: Conflicts of Interest Policy C-14
Materials Management: Vendor Management and Solicitation Policy CH:FI:18

Approved by:



DIO/Vice Chair, Medical Education

5/8/2024
Date

VI. REVIEW OR REVISION DATE

Approved by the GMEC: May 8, 2024