



MEMORANDUM

TO: Faculty, Keck School of Medicine of USC, Ostrow School of Dentistry of USC,
USC School of Pharmacy

FROM: Carmen A. Puliafito, M.D., M.B.A, Dean, Keck School of Medicine of USC *Carmen Puliafito*
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DATE: April 22, 2013

SUBJECT: Use of "diSClose" to make disclosures under USC's Relationships with Industry
policy

The Keck School of Medicine of USC, Ostrow School of Dentistry of USC , and USC School of Pharmacy support meaningful interactions and collaborations with pharmaceutical companies, biotechnology companies, device and medical equipment manufacturers and other healthcare suppliers ("Industry").

As you are aware, however, under no circumstances can we allow these collaborations to have or appear to have improper influence over our core missions of education, research and patient care. Since 2009, USC has required all healthcare professionals who have influence directly or indirectly over the prescribing, dispensing or purchasing of Industry products or services to disclose all consulting activity with Industry for university review and approval. It is therefore critical that all our healthcare professionals strictly adhere to USC's Relationships with Industry policy and promptly disclose all outside relationships with Industry before undertaking the activity so that the university can ensure that the relationship complies with the requirements of the policy.

In addition, On February 1, 2013, the Centers for Medicare & Medicaid Services published a final rule commonly known as the Physician Payment Sunshine Act. The Sunshine Act requires Industry to begin gathering records of payments to healthcare professionals effective August 1, 2013. CMS will make the information gathered available to the public on September 30, 2014.



In light of the Sunshine Act, and to assist USC providers in meeting their obligations under the Relationships with Industry policy, all new disclosures of consulting activity on behalf of Industry must be made using “diSClose” (<https://disclose.usc.edu>), an on-line system USC has developed to assist in the making and review of disclosures of outside activity. diSClose has been developed to make the disclosure process as efficient and simple as possible. diSClose is also the tool to be utilized if you are a researcher and have any research-related conflicts of interest. For guidance on how to use the system, please visit <http://ooc.usc.edu/diSClose-training-videos> to review a series of training videos.

Thank you for your cooperation in this important effort.