

USC's Relationship with Industry Policy Frequently Asked Questions

The University of Southern California supports meaningful interactions and collaborations with Industry. The Relationships with Industry Policy which was updated September 2009, provides guidance on how to properly engage in these interactions so as to keep them free from improper influence or even the appearance of improper influence. These FAQs have been developed to assist you in the application and compliance with the Relationships with Industry Policy.

Office of Compliance

1. Who is covered by this policy?

Any University employee or faculty member who has direct or indirect influence over prescribing, dispensing or the purchasing of products made by pharmaceutical companies, biotechnology companies, device and medical/dental equipment manufacturers and any other healthcare suppliers. Collectively we refer to these companies as "Industry". Examples of university employees covered by this policy include but are not limited to: doctors, dentists, pharmacists, physical therapists, occupational therapists, nurses, clinic staff, hospital staff, students, residents and fellows.

2. Are industry representatives allowed to visit the USC campuses?

Yes. They may visit if they have an appointment with a USC Healthcare Professional. Appointments with Industry may not take place in patient care areas (with some exceptions for device manufacturer representatives engaged in training or device refinement). All representatives must register with the USC centralized industry representative tracking system (RepTrax) and comply with applicable credentialing requirements. Prior to proceeding to an appointment, representatives must obtain a security identification pass at the Industry Representative Kiosks. These kiosks are located on the Health Science Campus at the University Hospital, Healthcare Consultation Center I Lobby and on the University Park Campus at the School of Dentistry's 1st floor west lobby reception.

3. Are industry representatives allowed to bring food to clinic/hospital staff or to appointments with USC Healthcare Professionals?

No. The direct provision of food is considered a gift and is not permitted.

4. Can we solicit funds from drug or device manufacturers to defray costs of departmental meetings/retreats?

No. These are considered administrative meetings and should be paid for from departmental funds.

5. Is it permissible to ask for Industry support of educational meetings/activities?

Yes. However, this support must be provided according to the requirements of Section D/ Education Grants. Examples of activities that are conducted to further education and which may be supported include grand rounds, journal club, morbidity and mortality conferences, etc. Whether or not CE is awarded, applicable standards of the ACCME must be complied with in the management of the educational meeting/activity.

6. An Industry representative has offered to underwrite the cost of travel, lodging and other expenses in connection with my attendance at an offsite meeting. May I accept this offer?

No. Subsidies from Industry may not be accepted directly or indirectly to pay for the costs of travel, lodging or other personal expenses when you are only attending a meeting.

7. What Consulting Arrangements are covered by the Relationships with Industry Policy?

Common types of consulting activities with Industry that are covered by this policy include: participation in advisory boards, providing training on new technology, providing advice on new products, industry sponsored speaking, etc.

8. What does the policy permit in terms of Industry Sponsored Speaking?

This type of speaking falls within the consulting section of the Relationships with Industry Policy and must comply with requirements found in Section A. It is important to understand if you have been asked to speak by Industry as *bona fide faculty* at an Industry-sponsored scientific conference or whether you have been asked to speak as part of a *Speaker's Bureau*. Participation in Speaker's Bureau activity is *strongly discouraged* as it is designed to promote one particular company's product or device and most often requires the use of the company's slides. In either case, it is most important that the USC Healthcare Professional disclose to the attendees orally/and or in writing, their financial support from Industry. At all times, a USC Healthcare Professional must be in control of their content and ensure that the information they present is based on the best scientific evidence available.

9. If I have been approached to perform consulting services for Industry, what are my obligations?

First: Advise the Industry company of the Relationships with Industry Policy and ask them to read through the policy. Consider carefully if the services that you are asked to provide

are in the best interest of the University, patients and your professional reputation.

Second: Ask that they put their request for services in the form of a written agreement. Requirements for consulting agreements can be found in Section A of the policy.

Third: When you receive a copy of the consulting agreement, read it to see if you think the agreement meets the requirements of the policy. Prior to initiating services under the agreement, submit the agreement to your Chair for review and approval.

10. What are my obligations regarding disclosure and recusal from purchasing decisions?

When you are participating in a committee that provides advice pertaining to purchasing (ex Pharmacy/Therapeutics Committee; Product Evaluation Committee) or when you are requesting the purchase of goods/equipment/services you must disclose any relevant past or current financial interests, management roles or consulting relationships.